State of Nebraska

Combined State Plan for Nebraska's Workforce System

July 1, 2016 to June 30, 2020

Workforce Innovation & Opportunity Act

Disclaimer: This draft version of the Combined State Plan for Nebraska's Workforce System is not to be considered final. All content herein is subject to change based on public comment and any subsequent Federal guidance.

How to Provide Comments

The Nebraska Department of Labor, Nebraska Department of Education, Nebraska Commission for the Blind and Visually Impaired, and Nebraska Department of Health and Human Services have released this Combined State Plan in compliance with the Workforce Innovation and Opportunity Act, and are seeking public comment for a thirty (30) day period.

This plan is accessible online at http://dol.nebraska.gov/. Comments for the plan may be made electronically or during a scheduled public hearing. Comments submitted electronically should be sent to ndol.wioa_policy@nebraska.gov.

A public hearing will be held on February 5, 2016 at 11:00 a.m. CST at the Nebraska State Office Building,14th and M Street, Lincoln, 6th Floor, Nebraska VR Conference Room. This hearing will be simultaneously made available at Nebraska VR locations across the state through interactive video conferencing technology. These locations include:

Columbus – 3100 23rd Street, Suite 5
Fremont – 827 North D Street
Grand Island – 203 E. Stolley Park Road, Suite B
Kearney – 315 W. 60th Street, Suite 400
Lincoln – 3901 N. 27th Street, Suite 6
Norfolk - 1212 Benjamin Ave.
North Platte - 200 South Silber, Bldg., 2,
Omaha - 1313 Farnam on the Mall
Omaha - 12011 Q Street
Scottsbluff – 505A Broadway, Suite 500

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Comments are due February 18, 2016.

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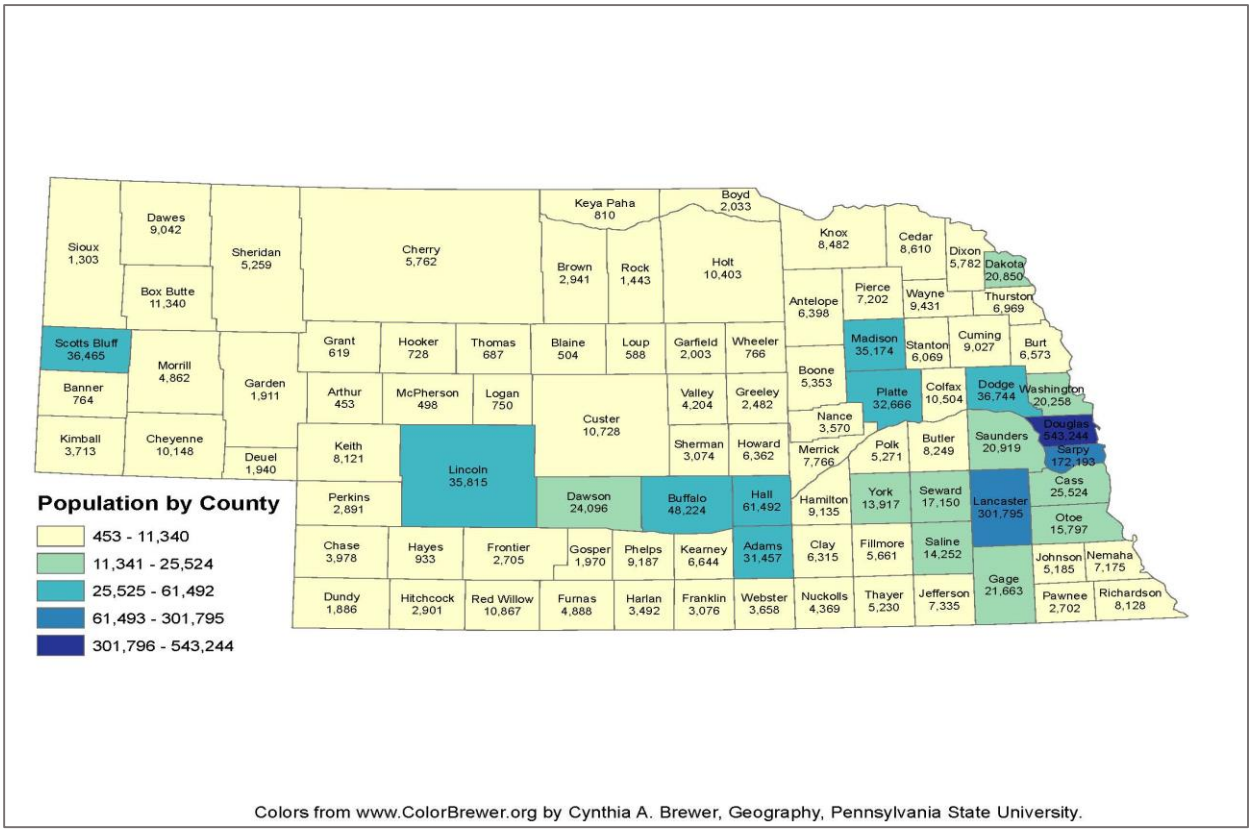
I. WIOA STATE PLAN TYPE

The State of Nebraska has elected to adopt a Combined State Plan for its Workforce System. The plan, which follows, represents the collective planning, resources and vision of the six core workforce development programs (i.e., the Adult, Dislocated, and Youth Programs; the Wagner-Peyser Act, Adult Education and Family Literacy Program and the Vocational Rehabilitation Program comprised of Nebraska Vocational Rehabilitation and the Nebraska Commission for the Blind and Visually Impaired). In addition to the Core Partners, the following programs are also participating in the combined plan: Jobs for Veterans State Grant, Unemployment Insurance, Senior Community Service Employment Program, Trade Assistance Act, Temporary Assistance for Needy Families, Career Technical Education, and Migrant Seasonal Farmworker Program. Each of these entities was an active participant during the planning which occurred over the course of the past year and are fully committed to participate in the implementation of Nebraska Combined State Plan.

II. STRATEGIC ELEMENTS

Situated in America's heartland, the State of Nebraska is comprised of 77,358 square miles which makes it the 16th largest state in terms of sheer geographic area. In 2014, Nebraska's population was estimated at 1,881,503 residents using 1-year estimates from the American Community Survey, which places Nebraska 37 out of 50 states. Nearly 40% of the state's population was

Illustration 1: Nebraska Population Density by County



Source: U.S. Census Bureau, Population Division, 2014.

concentrated in the metropolitan areas of Omaha, Lincoln and South Sioux City (*American Community Survey, 1-year estimates, 2014*).

Nebraska is a state that offers the very best in both rural and urban living, a range of industries and occupations providing employment opportunities, a cost of living index that ranked 9th in the nation during the 3rd quarter of 2015 (*Council for Community and Economic Research*), a workforce that is well-regarded for its strong work ethic, appealing tax incentives for new and existing businesses, and several unique regions and areas that contribute to the state's economic climate. Simultaneously, in this ever-changing 21st economy, Nebraska struggles like many states to provide all of its residents with meaningful and gainful employment opportunities.
Nebraska's workforce system is driven by several telling pieces of data, shared throughout the enclosed economic and workforce analysis, that reveal some troubling gaps and trends in Nebraska's economy and workforce. Most illustrative through these data are (1) the extremely high number of underemployed workers within the state who earn less than a living wage or must hold two or more jobs in order to earn a living wage; (2) the plight of disadvantaged workers such as low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who have aged out of the foster care system; English Language Learners; individuals with low levels of literacy; single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; and the long-term unemployed; and (3) the need for a pipeline of workers with the technical skills and work readiness skills desired by employers, including those in industries that will drive Nebraska's economy well into the future.

(a) Economic, Workforce, and Workforce Development Activities Analysis

(1) Economic and Workforce Analysis

(A) Economic Analysis

Gross Domestic Product, Personal Income, Inflation Data from the Bureau of Economic Analysis show that the current-dollar gross domestic product (GDP) for Nebraska in 2014 was $112.2 billion, up slightly from $109.4 billion in 2013. Over this time period, Nebraska real GDP grew 0.7% in 2014 while the 2013-2014 national change was 2.2%. Real GDP for the Lincoln Metropolitan Statistical Area (MSA) has increased steadily since a slight dip in 2008 and currently stands at just over $16 billion. GDP for the Omaha MSA has been increasing since 2010, and in 2014 the real GDP in Omaha was $52.7 billion. The Sioux City MSA has been fluctuating for over the past decade but had experienced an increase from $7.85 billion in 2013 to $7.86 billion in 2014 (*Bureau of Economic Analysis, 2015*).
Personal income in Nebraska has increased steadily since experiencing a slight dip in 2009. Total Personal Income (TPI) in Nebraska for 2014 was $89.5 million which ranked 36th in the United States. In 2014, Nebraska ranked 18th in per capita personal income (PCPI) at $47,557, which was 103% of the national average and represented an increase of 2.8% from 2013. In September 2015, the Consumer Price Index (CPI) for the Midwest urban region was 225.184 which was lower than the U.S. city average CPI (237.945) (*Bureau of Economic Analysis, 2015*).

(i-ii) Existing and Emerging Demand Industry Sectors

From 2010 to 2014, employment in the Trade, Transportation and Utilities industry (comprised of wholesale trade, retail trade, transportation and warehousing) in Nebraska steadily increased annually. Similarly, over the same period, the Educational and Health Services industry employment increased steadily. Employment in the Manufacturing industry, the Finance industry, and the Professional and Business Services industry also increased annually since 2010. From 2010 to 2014, the Leisure and Hospitality industry also experienced employment gains annually. Other industries in Nebraska have had employment fluctuations from 2010 to 2014. The Natural Resources and Mining and Construction industry employment decreased in 2011 from 2010, but increased every year since. Employment in the Information industry, which includes the broadcasting, telecommunications and data processing industries, peaked in 2012 but has declined each following year. Government and Other Services jobs declined in 2011 compared to 2010, but jobs in both industries increased annually from 2011 to 2014 (*NEworks, Data Download Center: Projections Data Files, 2015*).

Industry projections across all Nebraska industries show total growth of 9.54% through 2022. This includes annual growth of .92% and an employment change of 102,252 job openings (i.e., from 1,071,406 jobs in 2012 to an anticipated 1,173,658 jobs in 2022). (*Nebraska Department of Labor, Labor Market Information, Projections*, *2016*). The enclosed table details Nebraska's top 12 industries in terms of 2022 projected total employment. The industry with the most projected employment in 2022 is Health Care and Social Assistance with an anticipated 1156,933 jobs, a figure that represents 13.4% of all projected Nebraska jobs in 2022. Other high-employment industries, in terms of sheer numbers of jobs, include retail trade, educational services, and manufacturing.

Table 1: Industry Projections, 2012-2022

Industry	2012 Estimated Employment	2022 Projected Employment	Total 2012-2022 Employment Change	Annual Avg. Percent Change	Total Percent Change
Total, All Industries	1,071,406	1,173,658	102,252	0.92%	9.54%
Health Care and Social Assistance	132,514	156,933	24,419	1.71%	18.43%
Retail Trade	105,261	110,728	5,467	0.51%	5.19%
Educational Services	99,114	109,097	9,983	0.96%	10.07%
Manufacturing	94,773	101,315	6,542	0.67%	6.90%
Accommodation and Food Services	71,323	79,979	8,656	1.15%	12.14%
Finance and Insurance	61,801	66,880	5,079	0.79%	8.22%
Transportation and Warehousing	51,198	58,420	7,222	1.33%	14.11%
Construction	42,192	52,805	10,613	2.27%	25.15%
Professional, Scientific, and Technical Services	42,487	51,912	9,425	2.02%	22.18%

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Administrative and Support and Waste Management and Remediation Services	44,937	50,310	5,373	1.14%	11.96%
Agriculture, Forestry, Fishing and Hunting	50,183	44,723	-5,460	-1.15%	-10.88%
Wholesale Trade	41,236	43,004	1,768	0.42%	4.29%
Source: Nebraska Department of Labor, Labor Market Information, Projections					

High-Wage, High-Skill, High-Demand (H3)

In recent years, the Nebraska Departments of Labor and Education in partnership with the Nebraska Department of Economic Development have focused their respective efforts towards existing and emerging occupations which meet certain high-wage, high-skill and high-demand criteria. Known as H3 occupations, these occupations are considered high-wage when at least half of their wage measures are at or above the regional average for all occupations. Occupations that require some college, no degree or a higher level of educational attainment are high-skill, and these include occupations that require a high school diploma or equivalent plus long-term on-the-job training, an apprenticeship, or internship/residency. The number of annual openings, net change in employment, and growth rate determine whether an occupation is high-demand. While Nebraska's economy has historically been driven by agriculture, several industries within the state have emerged recently to also offer tremendous employment opportunities. Using an H3-driven approach, Nebraska is working to place unemployed workers in training programs leading to H3 jobs that pay above Nebraska $9.13 median wage.

Using data for the week ending December 28, 2015, the top H3 occupations in the state, ranked by the number of then-current openings, were Heavy and Tractor-Trailer Truck Drivers (45 openings); Emergency Medical Technicians and Paramedics (32); Registered Nurses (23); First-Line Supervisors of Production and Operating Workers (15); Bus and Truck Mechanics and Diesel Engine Specialists (11); Computer User Support Specialists (10); Automotive Service Technicians and Mechanics (8); Plumbers, Pipefitters, and Steamfitters (7); Licensed Practical and Licensed Vocational Nurses (6); and Electricians (6). (*H3 Website H3 Demand Report, December 28, 2015*).

As shown in the enclosed table that follows, the top H3 occupations in terms of the projected number of jobs includes Heavy and Tractor-Trailer Truck Drivers; Registered Nurses; General and Operations Managers; Carpenters; Accountants and Auditors; Elementary School Teachers, Except Special Education; Maintenance and Repair Workers, General; Secondary School Teachers, Except Special and Career/Technical Education; Licensed Practical and Licensed Vocational Nurses; and Plumbers, Pipefitters, and Steamfitters. These occupations are projected to experience growth ranging from 7.8% to 23.2%. As previously stated, each of these occupations meets the criteria of an H3 job and represent a diverse array of career options *(H3 Website, H3 Demand Report 2015)*. Subsequently, these professions offer an attractive wage and provide jobseekers with a range of rewarding career options within the state.

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Table 2: Employment Projections for H3 Occupations by 2022 Estimated Employment

SOC Code	Standard Occupation Classification (SOC) Title	2012 Estimated Employment	2022 Estimated Employment	Percent Change
53-3032	Heavy and Tractor-Trailer Truck Drivers	27,997	32,713	16.8%
29-1141	Registered Nurses	22,053	24,792	12.4%
11-1021	General and Operations Managers	11,091	12,425	12.0%
47-2031	Carpenters	9,783	12,057	23.2%
13-2011	Accountants and Auditors	9,848	11,171	13.4%
25-2021	Elementary School Teachers, Except Special Education	9,683	10,659	10.1%
49-9071	Maintenance and Repair Workers, General	8,375	9,029	7.8%
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	7,681	8,451	10.0%
29-2061	Licensed Practical and Licensed Vocational Nurses	6,287	7,678	22.1%
47-2152	Plumbers, Pipefitters, and Steamfitters	5,462	6,097	11.6%
Source: H3 Website, H3 Demand Report.				

In looking specifically at those H3 jobs projected to experience the most growth percentage-wise through 2022, the enclosed table details the top 10 fastest growing occupations. It should be noted that several of these occupations, while fast-growing, are expected to add relatively low numbers of jobs to the economy.

Table 3: Fastest Growing H3 Occupations by Percent Growth Through 2022

SOC Code	Standard Occupation Classification (SOC) Title	Percent Growth	2012 Estimated Employment	2022 Estimated Employment
31-2011	Occupational Therapy Assistants	45.1%	111	161
29-2091	Orthotists and Prosthetists	41.9%	93	132
47-2132	Insulation Workers, Mechanical	41.5%	106	150
31-2021	Physical Therapist Assistants	36.5%	668	912
51-4012	Computer Numerically Controlled Machine Tool Programmers, Metal and Plastic	35.2%	145	196
15-1122	Information Security Analysts	33.7%	493	659

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29-1071	Physician Assistants	33.1%	850	1,131
39-5094	Skincare Specialists	32.1%	380	502
15-2031	Operations Research Analysts	31.8%	239	315
29-1181	Audiologists	30.5%	128	167
Source: NEworks, Data Download Center: Projections Data Files, 2015.				

In looking specifically at those H3 occupations expected to experience the most annual openings as a result of new growth and replacement openings, Heavy and Tractor-Trailer Truck Drivers are expected to add an average of 920 jobs each year through 2022, followed by Registered Nurses which are anticipated to average 702 openings per year. These occupations are followed by Accountants and Auditors; Carpenters; General and Operations Managers; Elementary School Teachers, Except Special Education; Licensed Practical and Licensed Vocational Nurses; Secondary School Teachers, Except Special and Career/Technical Education; Maintenance and Repair Workers, General; and Industrial Machinery Mechanics. As H3-designated occupations, annual salaries within these occupations range from $35,235 for Carpenters to as much as $109,991 for General and Operations Managers (*NEworks, Data Download Center: Projections Data Files, 2015)*.

Table 4: Top H3 Occupations with Annual Openings, Annual Salary, and Current Hourly Entry Wage

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Average Annual Salary	Average Hourly Wage
53-3032	Heavy and Tractor-Trailer Truck Drivers	920	$43,201	$20.77
29-1141	Registered Nurses	702	$58,726	$28.24
13-2011	Accountants and Auditors	424	$67,183	$32.30
47-2031	Carpenters	347	$35,235	$16.94
11-1021	General and Operations Managers	341	$109,991	$52.88
25-2021	Elementary School Teachers, Except Special Education	311	$50,560	N/A
29-2061	Licensed Practical and Licensed Vocational Nurses	293	$39,553	$19.01
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	286	$51,919	N/A

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49-9071	Maintenance and Repair Workers, General	226	$36,828	$17.70
49-9041	Industrial Machinery Mechanics	195	$46,139	$22.18
Source: NEworks, Data Download Center: Projections Data Files, 2015.				

The H3 strategy being implemented by Nebraska is an extension of the findings from a report developed by Battelle in 2010 and updated in 2015. The report, which was jointly commissioned by the Nebraska Department of Labor and the Nebraska Department of Economic Development, sought to provide an assessment and an associated recommended strategy to promote economic development within Nebraska.

The 2010 study, entitled *A Competitive Advantage Assessment and Strategy for Nebraska,* led to the creation of Nebraska's Economic Industry Clusters. As defined by the Battelle study, Nebraska Economic Industry Clusters are "closely related industries that are logically connected" and contribute to a significant level of state economic activity and wealth. Economic Industry Clusters "may share a common market that they serve, while others are based more on shared 'know how' such as in the biosciences or information technology" related clusters (*Battelle, 2010*).

The 2010 Battelle Report identified 12 primary industry clusters within Nebraska that drive economic growth within the state. These include (1) Agricultural Machinery, (2) Agriculture and Food Processing, (3) Biosciences, (4) Business Management and Administrative Services, (5) Financial Services, (6) Health Services, (7) Hospitality and Tourism, (8) Precision Metals Manufacturing, (9) Renewable Energy, (10) Research, Development and Engineering Services, (11) Software and Computer Services, and (12) Transportation, Warehousing, and Transportation Logistics (*Battelle, 2010*).

The 2015 updated report, which is included in the appendix, reviewed the targeted industry clusters and the performance of the state from 2010 to 2014 using a variety of metrics to determine the state's preparedness for an innovation-driven economy that can remain competitive. These included such measures as academic performance in science and engineering, entrepreneurial activity, the availability of risk capital, research and development, including new patents and university technology transfer activity. These measures were then compared to several "benchmark" states that were identified in 2010 to show comparative progress over time relative to the identified metrics.

The 2015 updated report concluded that:

1) Nebraska's 12 primary industry clusters largely "held up well" during the 2010-2014 timeframe and should remain unchanged for the time being. The report mentions specifically that while certain clusters may have performed poorly over the time period, it would be "premature to suggest changes" to these clusters.

2) Performance in producing high-skilled talent (as measured by the attainment of science and engineering degrees) was "mixed." While Nebraska has improved in nearly every measure of education attainment, it still lags behind the national averages in most areas. It did, however, outperform several benchmark states in education measures.
3) Entrepreneurial activity within the state, as measured by the growth of new business establishments, job creation from new business establishments, and *Inc.* magazine's listing of the fastest growing US businesses, is lagging behind the nation as a whole and the benchmark states. Despite the lagging performance, the report did note that Nebraska has "improved somewhat compared to the benchmark states.
4) The availability of risk capital within the state remains relatively low when using such indicators as venture capital investments and Small Business Innovation Research grants awarded to entrepreneurs within the state. In fact, from 2009-2014, Nebraska ranked 41 out of 50 states in the dollar amount of venture capital invested and last among the nine benchmark states. Further, despite some improvement in the number of SBIR grants secured, Nebraska inventors continue to lag severely behind their peers nationally and in most of the benchmark states in successfully pursuing SBIR funding.
5) Research and development (R&D) expenditures within Nebraska, measured within the industry and academic sectors, performs well given the state's economy and growth rate. Specifically, the 2015 report noted that Nebraska is "well above the national level and one of the highest among the benchmark states."
6) Patent generation within the state continues to trail the amount of patent generation at the national level and within the benchmark states. The report did note that Nebraska has shown some improvement in this area since 2010 and the growth rate of new patents is "increasing faster than average."

The initial Battelle Report and its 2015 update, provide several key pieces of data that are critical to developing those sectors that promote wealth creation within the state. The enclosed location quotient map provides a visual representation of economic activity statewide within one such sector, the growing Software and Computer Services Industry. The map accounts for such factors as average employment within the industry cluster, total employment within the county, average employment within the cluster statewide and total employment statewide. A value of 1.00 means that the concentration in the county equals that of the state and a value greater than 1.00 means a higher concentration of the industry than in the state.

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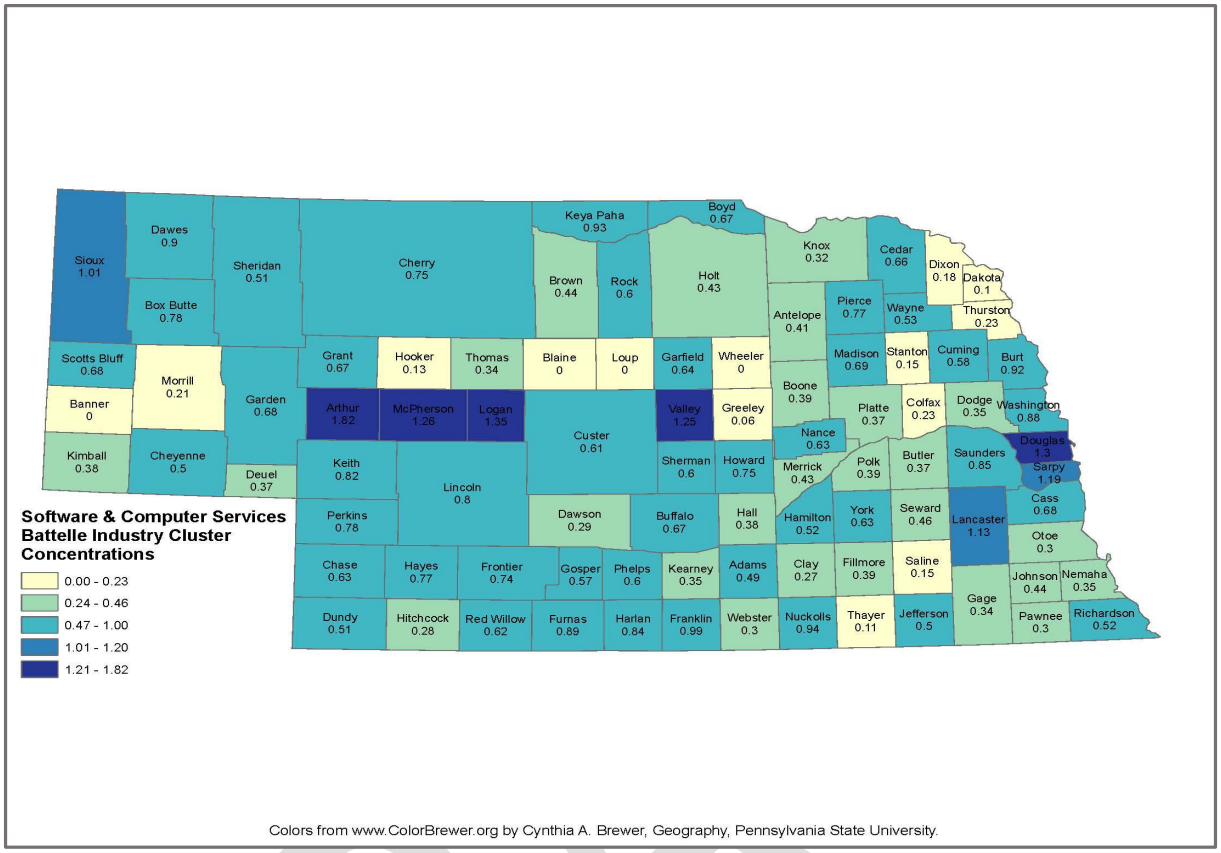
Illustration 2: Software & Computer Services Battelle Industry Cluster Concentration Map



Source and Methodology: Nebraska Department of Labor using Quarterly Census of Employment and Wages (QCEW) data for the first quarter of 2015, which was first filtered for only private establishments, then summed by county and 6 digit NAICS code, and average employment for the quarter was computed. The data were then summed into 3 digit NAICS codes and run through the Battelle to NAICS crosswalk to assign Battelle cluster codes to each 3 digit NAICS code.

The appendix includes location quotient concentration maps for each of the twelve industry clusters identified in the Battelle Report. It should be noted that these maps do not necessarily reflect overall economic activity from a statewide perspective, but instead provide a snapshot of relative industry sector activity within a county. A complete copy of the updated 2015 Battelle Report can also be found in the Appendix.

H-1B Visa Labor Condition Applications

In addition to the occupational and industry needs identified herein, Nebraska submitted 1,697 Labor Condition Applications for H-1B Visas in 2014, of which 1,502 were certified. These certifications represent 3,032 high-skill jobs in the state with an average salary of $74,362 (*Office of Foreign Labor Certification, 2014 Annual Report*). The enclosed table details the top occupations within Nebraska for which H-1B visa applications were submitted in 2014. The table also includes the number of applications certified as well as the average salary for those positions using national H-1B wage data (*Office of Foreign Labor Certification, 2014 Annual Report*).

Table 5: Top H-1B Occupations by Number of Applications in 2014

SOC Code	Standard Occupation Classification (SOC) Title	Number of H-1B Applications Certified	Average Wage Offer
15-1121	Computer Systems Analysts	854	$66,489
15-1131	Computer Programmers	432	$61,835
15-1132	Software Developers, Applications	391	$79,816
15-1199	Computer Occupations	305	$70,248
13-2011	Accountants and Auditors	211	$51,392
Source: Office of Foreign Labor Certification, 2014 Annual Report.			

While the occupations and industries detailed within the enclosed tables document growth and potential across the state as a whole, the unique economic and workforce dynamics of communities and economic regions designated by the Governor will also continue to inform strategies implemented at the regional and local levels. This includes sector strategies and career pathways as described later in this plan, as well as customized short-term training and rapid response protocols in order to support, maintain and promote the economic vitality of Nebraska's communities.

(iii.) Employer Employment Needs

As shown in the enclosed table, of Nebraska's top 10 H3 occupations with the most projected openings between 2012 and 2022, all but three of the occupations require education beyond high school. The remainder of these occupations require a high school diploma and some equivalent job experience or training. In keeping with the definition of an H3 occupation (i.e., at least half of their wage measures are at or above the regional average for all occupations), each of these jobs offer an attractive entry wage that ranges from $12.05 for Maintenance and Repair Workers, General to $27.29 for General and Operations Managers. Longer term, these occupations offer workers the potential for higher wages as shown in the enclosed table and as measured by the median wage within these occupations (*NEworks, Data Download Center: Projections Data Files, 2015; Nebraska Department of Labor, Labor Market Information, Occupational Employment Statistics)*.

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Table 6: 2012-2022 H3 Occupation Projections by Average Annual Openings Positions

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Average Entry Wage	Median Wage	Education
53-3032	Heavy and Tractor-Trailer Truck Drivers	920	$14.40	$20.65	Postsecondary non-degree award
29-1141	Registered Nurses	702	$21.50	$27.81	Associate's degree
13-2011	Accountants and Auditors	424	$20.17	$28.76	Bachelor's degree
47-2031	Carpenters	347	$12.11	$16.44	HS diploma or equivalent
11-1021	General and Operations Managers	341	$27.29	$45.07	Bachelor's degree
25-2021	Elementary School Teachers, Except Special Education	311	$39,735*	$50,562*	Bachelor's degree
29-2061	Licensed Practical and Licensed Vocational Nurses	293	$16.37	$18.70	Postsecondary non-degree award
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	286	$40,307*	$51,893*	Bachelor's degree
49-9071	Maintenance and Repair Workers, General	226	$12.05	$17.35	HS diploma or equivalent
49-9041	Industrial Machinery Mechanics	195	$15.55	$21.37	HS diploma or equivalent
Source: NEworks, Data Download Center: Projections Data Files, 2015; Nebraska Department of Labor, Labor Market Information, Occupational Employment Statistics.					

**Average entry and median annual salary information provided when wage data not available*

Occupations in the "Postsecondary Non-Degree Award" category includes those occupations that require less than two years of training for entry employment and encompasses a variety of occupations (see Table 7). Heavy and Tractor-Trailer Truck Drivers are projected to experience the highest number of annual openings through 2022 with an estimated 920 openings per year. (Truck driving usually requires one to five years of work experience in addition to short-term on-the-job training.) Licensed Practical and Licensed Vocational Nurses; Electricians; and Welders, Cutters, Solderers and Brazers are the next fastest growing occupations, respectively, in the Postsecondary Non-Degree Award category. Of the "Postsecondary Non-Degree Award" occupations listed, First-Line Supervisors of Production and Operating Workers and Electrical Power-Line Installers and Repairers have the highest entry hourly wage ($18.17 and $17.42, respectively) (*NEworks, Data Download Center: Projections Data Files, 2015; Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015)*.

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Table 7: 2012-2022 Occupational Projections Top 10 Most Annual Openings for Postsecondary Non-Degree Award Education Level with Entry Wages

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Hourly Entry Wage (3rd quarter 2015)	Median Wage
53-3032	Heavy and Tractor-Trailer Truck Drivers	920	$14.40	$20.65
29-2061	Licensed Practical and Licensed Vocational Nurses	293	$16.37	$18.70
47-2111	Electricians	155	$14.37	$20.56
51-4121	Welders, Cutters, Solderers, and Brazers	153	$13.15	$17.18
51-4041	Machinists	144	$12.93	$18.23
47-2152	Plumbers, Pipefitters, and Steamfitters	132	$15.93	$24.04
51-1011	First-Line Supervisors of Production and Operating Workers	94	$18.17	$26.33
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	85	$15.55	$22.20
49-9051	Electrical Power-Line Installers and Repairers	72	$17.42	$27.86
29-2071	Medical Records and Health Information Technicians	69	$13.24	$17.56

Source: NEworks, Data Download Center: Projections Data Files, 2015. Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015.

For those occupations that require an associate's degree, six of the top 10 projected occupations in Nebraska are in medical fields. As detailed in Table 8 below, Registered Nurses top the list with 702 average annual openings. Other medical occupations with large numbers of openings include Dental Hygienists, Medical and Clinical Laboratory Technicians, Radiologic Technologists, Physical Therapist Assistants, and Respiratory Therapists. Other occupations, such as Preschool Teachers, Except Special Education and Web Developers, are also included (*NEworks, Data Download Center: Projections Data Files, 2015. Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015)*.

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Table 8: 2012-2022 H3 Occupational Projections Top 10 Most Annual Openings for Associate's Degree with Entry Wages from the Occupational Employment Statistics Survey

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Hourly Entry Wage (3rd quarter 2015)	Median Wage
29-1141	Registered Nurses	702	$21.50	$27.81
29-2021	Dental Hygienists	68	$25.35	$31.90
29-2012	Medical and Clinical Laboratory Technicians	59	$12.92	$18.33
29-2034	Radiologic Technologists	52	$19.27	$24.26
15-1134	Web Developers	46	$15.86	$26.20
23-2011	Paralegals and Legal Assistants	46	$15.31	$19.86
31-2021	Physical Therapist Assistants	39	$18.08	$24.44
15-1152	Computer Network Support Specialists	32	$19.77	$28.53
29-1126	Respiratory Therapists	27	$21.07	$24.52
29-2032	Diagnostic Medical Sonographers	17	$25.82	$30.25

Source: NEworks, Data Download Center: Projections Data Files, 2015. Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015.

As documented in Table 9 below, of the top 10 most openings for bachelor's degrees, four entail computer-related occupations, three are education-related with the remaining three occupations comprised of Accountants and Auditors, General and Operations Managers, and Market Research Analysts and Marketing Specialists. The highest hourly entry wage for occupations was for General and Operations Managers ($27.29) and Software Developers, Applications ($25.55). Hourly entry wage was not available for education-related occupations but an annual entry and median salary are provided (*NEworks, Data Download Center: Projections Data Files, 2015. Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015)*.

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Table 9: 2012-2022 H3 Occupational Projections Top 10 Most Annual Openings for Bachelor's Degree with Entry Wages

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual Openings	Hourly Entry Wage (3rd quarter 2015)	Median Wage
13-2011	Accountants and Auditors	424	$20.17	$28.76
11-1021	General and Operations Managers	341	$27.29	$45.07
25-2021	Elementary School Teachers, Except Special Education	311	$39,735*	$50,562*
25-2031	Secondary School Teachers, Except Special and Career/Technical Education	286	$40,307*	$51,893*
15-1132	Software Developers, Applications	164	$25.55	$37.87
13-1161	Market Research Analysts and Marketing Specialists	154	$17.94	$27.94
15-1121	Computer Systems Analysts	139	$24.61	$35.10
15-1142	Network and Computer Systems Administrators	134	$23.04	$31.60
15-1131	Computer Programmers	121	$22.63	$36.31
25-2022	Middle School Teachers, Except Special and Career/Technical Education	113	$41,462*	$50,664*
Source: NEworks, Data Download Center: Projections Data Files, 2015. Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015.				

**Annual entry wages is provided when hourly wage data are not available*

In addition to these projected occupational needs, industry groups in the state have expressed concern over a shortage of skilled workers in certain trade occupations, such as welding. The Nebraska Department of Labor, Economic Development, Education and postsecondary education institutions continue to work to alleviate these shortages and high-wage, high-skills and high-demand occupations are a strong focus in the enclosed Combined State Plan for Nebraska's Workforce System. Strategies such as career pathways, sector strategies and other targeted approaches will be initiated as appropriate to meet the needs identified through labor and economic data and those expressed through employers in the state.

(B) Workforce Analysis

Population and Age According to 2013 American Community Survey three-year estimates, of those 62-69 years of age, a higher percentage of Nebraskans (54.1%) participated in the labor

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force when compared to the nation as a whole (43.6%). Older workers continue to be served through the core, intensive and training services offered at the American Job Centers, and fill employers' needs for experienced, knowledge-based workers. The state's *Senior Community Service Employment Program* and the USDOL Title V Program known in Nebraska as *Experience Works*, are resources for older workers who are also ensured nondiscrimination and equal opportunity by the *Equal Opportunity and Nondiscrimination* policy (*U.S. Census Bureau, Population Division, Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2014*).

The workforce system within Nebraska must account for the growing numbers of workers who are approaching retirement age. The enclosed table provides the number and percentage of workers in each industry who are ages 55 and older, as well as younger workers who represent a significant segment of Nebraska's present and future workforce. Of particular note is the high percentages of older workers within the Construction; Manufacturing, Professional, Scientific, and Technical Services; and Transportation and Warehousing industries where nearly one in every three workers are 55 years of age or older. These industries have long been essential drivers of economic growth and stability within Nebraska, and developing a talent pipeline to assume projected openings will not only help to support these industries but also to provide employment opportunities in industries offering an abundance of occupations that are high-wage, high-skill and high-demand.

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Table 10: Industry Employment by Age Group Second Quarter 2015

Industry Title	Total	Age 24 and Younger	Percent 25 and Younger	Age 55 and Older	Percent 55 and Older
All Industry	72,860	33,369	45.7%	5,774	7.9%
Accommodation and Food Services	52,908	9,951	18.8%	8,275	15.6%
Administrative and Support and Waste Management and Remediation Services	11,562	2,082	18.0%	3,055	26.4%
Agriculture, Forestry, Fishing and Hunting	17,295	6,558	37.9%	2,990	17.3%
Arts, Entertainment, and Recreation	46,195	6,684	14.5%	8,555	18.5%
Construction	89,113	5,780	6.5%	28,813	32.3%
Educational Services	54,429	4,516	8.3%	12,460	22.9%
Finance and Insurance	131,263	18,067	13.8%	30,795	23.5%
Health Care and Social Assistance	19,259	2,387	12.4%	4,139	21.5%
Information	11,136	663	6.0%	2,200	19.8%
Management of Companies and Enterprises	95,951	8,312	8.7%	22,586	23.5%
Manufacturing	4,879	103	2.1%	337	29.4%
Mining, Quarrying, and Oil and Gas Extraction	27,672	5,424	19.6%	5,704	22.1%
Other Services (except Public Administration)	45,057	5,070	11.3%	9,155	21.0%
Professional, Scientific, and Technical Services	49,105	6,938	14.1%	15,376	31.0%
Public Administration	12,909	1,359	10.5%	2,750	27.3%
Real Estate and Rental and Leasing	115,307	35,624	30.9%	24,053	20.1%
Retail Trade	26,432	2,062	7.8%	7,232	29.4%
Transportation and Warehousing	12,318	467	3.8%	2,604	29.5%
Utilities	44,270	4,373	9.9%	11,761	27.0%
Wholesale Trade	72,860	33,369	45.8%	5,774	7.9%
Source: NEworks, Data Download Center, 2015.					

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Disability Estimates from the 2011-2013 American Community Survey show that 5.2% of Nebraskans in the labor force have a disability. Of those who are unemployed in Nebraska, 11.5% have a disability while 88.5% have no disability. Nearly 5% of employed Nebraskans reported

having a disability, with the greatest percentage of those having a hearing difficulty (36.8%) (*U.S. Census Bureau, 2011-2013 3-Year American Community Survey*).

Further statistics show that the significant population of persons with disabilities in Nebraska are in need of workforce services in order to bridge the gap between themselves and their peers across the state.

- There are a total of 205,354 persons within Nebraska with a disability (*Annual Disability Statistics Compendium, 2014*), of which 88,700 are between the ages of 21 and 64 (*2012 Disability Status Report, disabilitystatistics.org*).
- Of those Nebraskans ages 18-64 with a disability, only 45.5% are employed, a rate that is significantly less than the 82.6% employment rate for Nebraskans, ages 18-64, without a disability (*Annual Disability Statistics Compendium, 2014).*
- A total of 16,900 persons with disabilities in Nebraska receive benefits (*2012 Disability Status Report, disabilitystatistics.org*), and
- In 2012 alone, Nebraska's total expenditure on SSDI benefits was $594,300,000 (*Annual Disability Statistics Compendium, 2014*).

Nebraska has many options for assisting disabled customers in finding work. NEworks, which offers job search and career exploration resources, has text sizing options and is designed to work with JAWS for visually impaired customers, and assistive technologies have been upgraded in the American Job Centers to assist disabled customers. American Job Center staff are aware of the resources in the Job Accommodation Network (JAN) and can provide employers information on options for accommodations in the Searchable Online Accommodation Resource (SOAR). The disabled may also include disabled veterans. The Jobs for Veterans State Grant (JVSG) outreach program staff are actively involved in employer contacts and individual counseling for veterans with significant barriers to employment (SBE). Nebraska Vocational Rehabilitation is a primary partner in the service delivery system offered at the local American Job Centers. Referrals as well as co-enrollment of participants in WIOA and Vocational Rehab programs is common practice in Nebraska.

Homeless According to the *2015 Annual Homeless Assessment Report to Congress*, there were approximately 2,744 homeless people in Nebraska in 2015. The unsheltered homeless rate in Nebraska was 4.5% in 2014, which was the 5th lowest such rate in the country behind only Delaware (3.9%), Rhode Island (3.2%), Massachusetts (2.8%), and Maine (2.5%) (*2015 Annual Homeless Assessment Report to Congress*). American Job Center staff are available to help homeless customers to find employment and are knowledgeable about additional community services such as shelters, food banks, and transitional services.

Race, Ethnicity, Immigration, and Language According to 2014 population estimates from the U.S. Census Bureau, there were nearly 38,000 people living in Nebraska who identify as two or

more races. Of those who identified with one race, the greatest number were White (1,682,074), followed by Black (92,289), Asian (41,216), American Indian and Alaska Native (41,216), and Native Hawaiian and Other Pacific Islander (2,235). In terms of ethnicity, there were 191,325 people identifying with the Hispanic or Latino ethnicity living in Nebraska in 2014, which accounts for 10.2% of Nebraska's total population. Nearly 24% of those who reported identifying with the Hispanic or Latino ethnicity were foreign born and became naturalized U.S. citizens (*U.S. Census Bureau, 2014 American Community Survey 1-Year Estimates).*

Of those who were foreign born and living in Nebraska, the race with the greatest percentage of naturalized citizenship was Black (47.1%), followed by Asian (44.5%), White (31.2%), Two or More Races (30.9%), American Indian and Alaska Native (3.1%) (*U.S. Census Bureau, Population Division, Annual Estimates of the Resident Population by Sex, Age, Race Alone or in Combination, and Hispanic Origin for the United States and States: April 1, 2010 to July 1, 2014*). Since 2010, the fastest growing minority group within the state has been the Asian population, which has increased from more than 33,322 in 2010 to nearly 41,216 in 2014, an increase of 23.5% (*Census Bureau, 2010 and 2014 Population Estimates*).

Given the influx of Hispanic, Asian and other foreign-born populations, there is a small but steady population with limited English proficiency, which can hinder the ability to seek, apply for and succeed in employment. Data from the American Community Survey, show that 2.6% of the state's population, ages 14 or older, does not speak English or speak English "very well" (*U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates*).

(i) Employment and Unemployment

Since January 2010, the total Nebraska civilian labor force (not seasonally-adjusted) peaked in July 2013 at 1,039,199 of which 993,176 were employed, for a 4.1% unemployment rate. The lowest level the total civilian labor force reached was in the first month of the sample, January 2010. The total civilian labor force had been over one million since September 2011, but in September 2015 dropped to 997,841 of which 971,682 were employed, equating to an unemployment rate of 2.6%. Preliminary data from October 2015 showed the civilian labor force increased to 1,010,068, of which 983,401 were employed, and the unemployment rate remained unchanged at 2.6%. Since January 2010, when the unemployment rate hit a recent high of 5.4%, the unemployment rate has dropped at a fairly steady rate and reached a low in April 2015 of 2.5% (*NEworks, Labor Force, Employment and Unemployment for Nebraska in Multiple Time Periods, 2015*).

Using data from 2013, claims show that 57.8% of individuals initially applying for unemployment insurance were male and 42.2% female. When aggregated by race, the greatest percentage of claimants were white (71.2%), followed by unknown/not provided (15%), and the third more predominant was the black population (10.8%), followed by American Indian or Alaska Native (1.8%), Asian (0.9%), and Native Hawaiian or Other Pacific Islander (0.2%) (*NEworks, Unemployment Insurance Claims Data, 2013*).

Nebraskans in the 25-34 age group (29.4%) had the greatest percentage of claimants by age followed by the 45-54 group (22%), 35-44 group (21%), 55-64 group (15.1%), 24 and younger group (8.5%), and lastly the 65 and over group (4.1%). The top 5 occupations in initial claims were

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Production (13,713), Construction and Extraction (11,941), Office and Administrative Support (11,180), Transportation and Material Moving (10,414), and Sales and Related (5,881). (*NEworks, Unemployment Insurance Claims Data, 2013*).

The education level of individuals filing claims revealed that 47.8% of claimants had a high school diploma. The second highest education category was some college education (22.5%) followed by less than a high school degree (16.2%). The education categories with the lowest percentage of initial claims were for bachelor's degree (7.4%), master's degree or higher (4.9%), and unknown/not provided (1.2%). Of Nebraska's unemployment insurance claimant population, a large percentage (64%) hold a high school diploma or less. These individuals could potentially benefit from Adult Basic Education or occupational skills training in order to obtain the skills needed by Nebraska employers (*NEworks, Data Download Center, Unemployment Insurance Claims Data: 2013 Unemployment Insurance Initial Claimant Characteristics, 2015*).

Underemployment: Nebraska has long enjoyed relatively low unemployment rates, and recorded the nation's second lowest such rate using November 2015 seasonally adjusted monthly rankings (Bureau of Labor Statistics, 2015). Despite the low number of unemployed Nebraskans, there is a significant number of workers within the state who work two or more jobs in order to make ends meet. Over the past three years, Nebraska has experienced a significant steady decrease of the number of jobseekers who are unemployed when they begin their job search. According to Nebraska's public labor exchange, the 4th Quarter ETA 9002A for PY12, PY13, and PY14, the percentage of those who are employed at the time of participation, (when they first seek services from Wagner-Peyser), has more than doubled. This indicates that roughly one third of those individuals seeking employment are probably underemployed or working multiple low-paying jobs.

Table 11: Number and Percentage of Employed Workers Who Initiate Employment Search

Program Year	Total Participants	Employed	Not Employed	Percentage
PY12	114,257	14,489	99,768	14.5%
PY13	95,776	22,462	73,314	30.6%
PY14	73,565	18,189	55,376	32.8%
Source: NEworks using Wagner-Peyser Participation data, 2016.				

Data from a June 2015 Metro Area Labor Availability Report developed jointly by the Nebraska Department of Labor and the Nebraska Department of Economic Development confirm the relatively high percentage of Nebraskans who are underemployed. The survey, which included the Omaha and Lincoln metropolitan areas, found that 14.1% of the survey's respondents held multiple jobs, or nearly one in every seven workers. Most telling in the data collected was the alarmingly high number of potential jobseekers (i.e., those who responded "yes" to one of the following questions "*Are you actively seeking a new job?*" "*Are you likely to change jobs in the next year if a suitable job is available?*" or "*Are you likely to reenter the workforce in the next year if a suitable job is available?*" In fact, the survey data found that there are 312,737 potential jobseekers within the Omaha and Lincoln areas, a figure that represents nearly one in every three Nebraska workers (*Metro Area Labor Availability Report, 2015*).

An abundance of employment opportunities that offer a competitive or living wage is a necessary component of a robust workforce system. A 2010 report released by Nebraska Appleseed found that a single parent with a preschooler residing in Omaha would need to make at least $16.39 per hour to simply make ends meet (*Self Sufficiency Standard for Nebraska 2010*). Using the Living Wage Calculator established by the Massachusetts Institute of Technology, the living wage for an Omaha family comprised of 2 adults and 3 children is $24.98. This is significantly higher than Nebraska's 2015 minimum wage of $8.00 per hour and higher than the median wage earned by all Nebraska workers ($15.95), suggesting a large percentage of families in Nebraska that do not make ends meet or that rely on multiple jobs to provide for basic necessities.

One issue facing underemployed and other disadvantaged workers seeking a higher wage is the "cliff effect," a term that describes the various levels at which a low-income person begins to lose benefits with increased income. The "cliff effect" was the focus of a 2010 report developed by Voices for Children in Nebraska. Using a family of three as the example, the report found that the family would need to make at least $20.62 per hour in order to meet basic needs which included food, child care, medical expenses, housing transportation and other expenses. Highlighted in the report were the various hourly wage levels at which the earner begins to lose work supports, based on full-time work. At $5.11 per hour, the worker will lose eligibility for adult Medicaid; at $11.44 per hour the worker loses eligibility for food stamps; at $16.29 per hour, access to child care subsidies are lost, and at $17.82 per hour, the worker is no longer eligible for health insurance for their children. The absorption of these costs oftentimes place a family in a worse position financially than they were prior to the increase in pay, creating a system that punishes rather than rewards hard work. Given the high percentage of underemployed workers within the state, the cliff effect is a strong concern for many of Nebraska's workforce partners as they work to move their underemployed customers into employment opportunities that lead to economic self-sufficiency.

(ii) Labor Market Trends

Nebraska is expected to expand its workforce by 9.93% from 2012 to 2022, with a projected increase of 100,340 wage and salary jobs. In the state as a whole, both Information (comprised of such industries as publishing, broadcasting, telecommunications, and data processing) and Natural Resources and Mining supersectors are expected to decline. Education and Health Services is expected to add 34,402 jobs from 2012 to 2022, the most of any supersector. Construction is expected to be the fastest growing with a 2.27% compound annual growth rate (CAGR). Of the industries projected to expand, Government is expected to experience the slowest growth, at 0.23% CAGR. The Services-Providing sector, which entails trade, transportation, retail, et al.), is projected to have a greater percent change in employment (10.77%) compared to the Goods-Producing sector (6.23%). Additionally, the Services-Providing sector is expected to experience faster growth (1.03% CAGR) compared to the Goods-Producing sector (0.61% CAGR). Services-Providing jobs are expected to make up 82% of total wage and salary jobs.

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As detailed in the enclosed Table 12, overall wages in Nebraska across all industries have increased since 2001. However, annual wage increases have generally been more modest since 2008 with the current median hourly wage only .96% greater than the median hourly wage in 2014. Nebraska occupational wages as reported by the Occupational Employment Statistics survey tend to be lower than the national rate for the same occupation. The average entry wage across all occupations is $9.70 per hour in the third quarter of 2015 while the average wage for an experienced worker is $25.35 per hour (*Nebraska Occupational Employment Statistics Employment and Wage Estimates*).

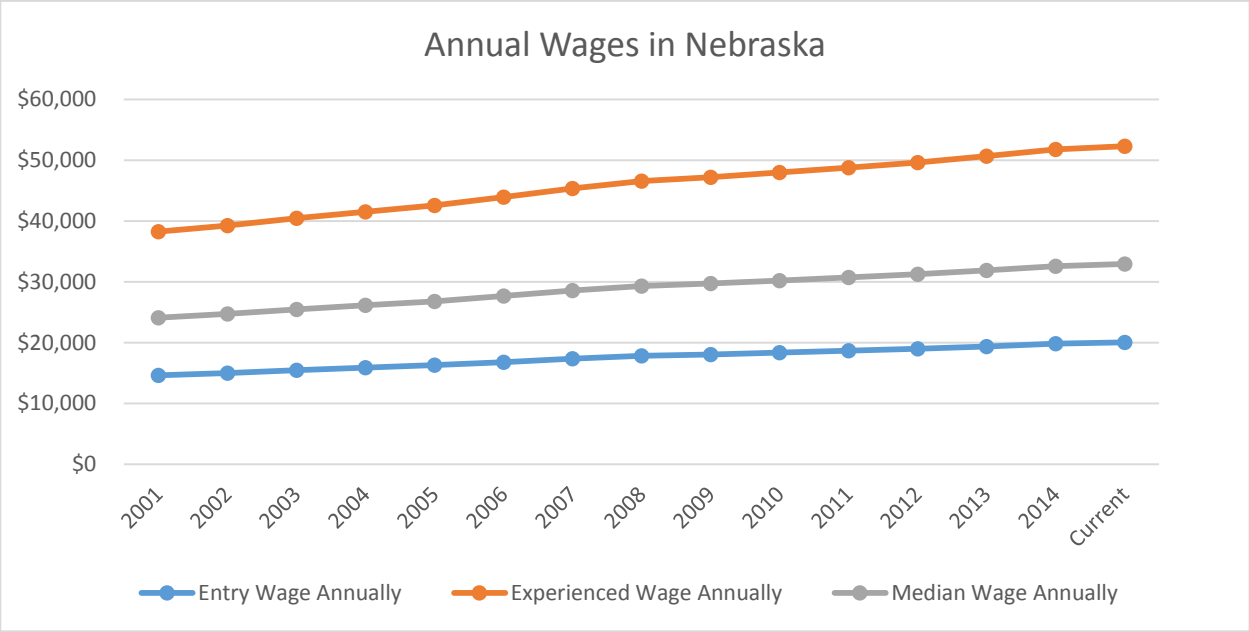
Table 12: Compensation Across All Industries, Nebraska

Year	Entry Wage Annually	Entry Wage Hourly	Experienced Wage Annually	Experienced Wage Hourly	Median Wage Annually	Median Wage Hourly	% Change Median Wage Hourly
Third Quarter 2015	$20,175	$9.70	$52,680	$25.35	$33,180	$15.95	1.59%
2014	$19,835	$9.55	$51,790	$24.90	$32,615	$15.70	2.28%
2013	$19,410	$9.35	$50,680	$24.35	$31,920	$15.35	1.99%
2012	$19,020	$9.15	$49,660	$23.85	$31,275	$15.05	1.69%
2011	$18,690	$9.00	$48,805	$23.45	$30,740	$14.80	1.72%
2010	$18,400	$8.85	$48,040	$23.10	$30,255	$14.55	1.75%
2009	$18,090	$8.70	$47,230	$22.70	$29,745	$14.30	1.42%
2008	$17,845	$8.60	$46,590	$22.40	$29,345	$14.10	2.55%
2007	$17,385	$8.35	$45,400	$21.85	$28,595	$13.75	3.38%
2006	$16,830	$8.10	$43,950	$21.15	$27,680	$13.30	3.10%
2005	$16,310	$7.85	$42,590	$20.45	$26,825	$12.90	2.38%
2004	$15,920	$7.65	$41,565	$20.00	$26,180	$12.60	2.86%
2003	$15,510	$7.45	$40,500	$19.45	$25,510	$12.25	2.94%
2002	$15,040	$7.25	$39,265	$18.90	$24,730	$11.90	2.59%
2001	$14,665	$7.05	$38,285	$18.40	$24,115	$11.60	-
Source: Nebraska Occupational Employment Statistics Employment and Wage Estimates.							

As detailed in the preceding table and depicted in the following charts, wages in Nebraska have increased steadily since 2001 when looking at both annual wages (see Chart 1) and hourly wages (see Chart 2). During this time period, annual entry wages have increased from $14,665 in 2001 to $20,045 currently, an increase of 36.68%. Annual wages for experienced workers have increased $38,285 to $52,340, an increase of 36.71% (*Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015*). In light of these data, it should be mentioned that the living wage for Nebraska, calculated using MIT's Living Wage calculator, is $24.13 for a family consisting of two adults (one who is working) and three

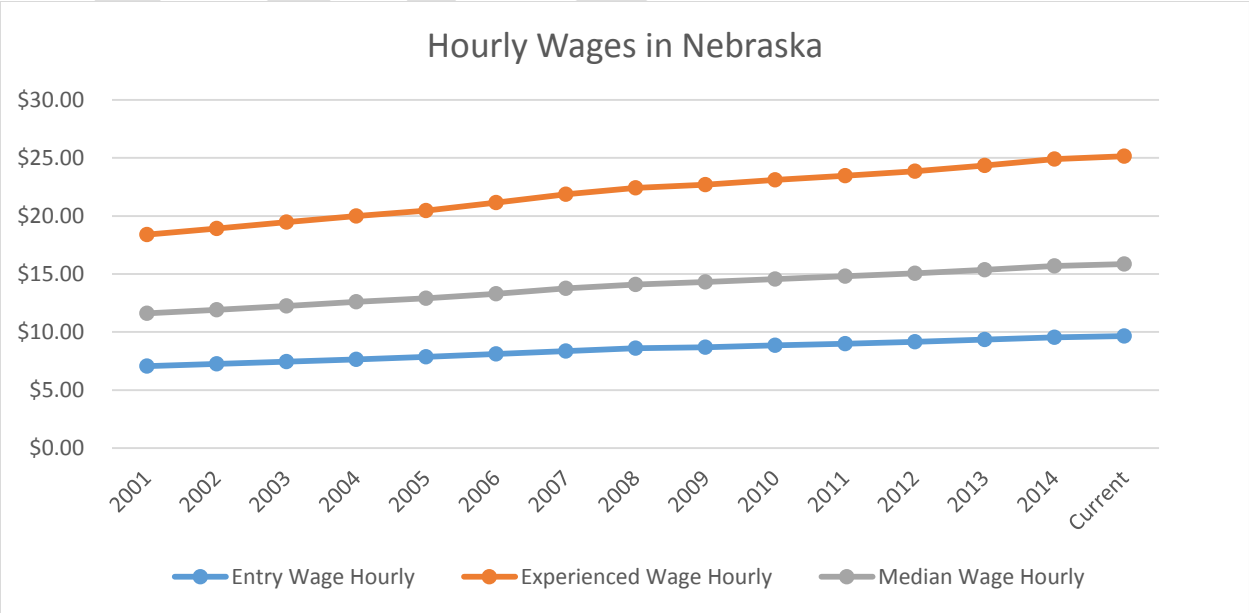
children (*Massachusetts Institute of Technology, 2015*). This benchmark of economic sustainability aligns with the average wage of $25.15 being earned by those Nebraska workers with experience. However, the $24.13 living wage established by MIT is higher than the median wage for all Nebraska workers of $15.85 and significantly higher than the $9.65 average wage for entry level workers within the state. These data further indicate a large percentage of Nebraska families who struggle to earn a living wage or who only earn a living wage through multiple low-paying jobs.

Chart 1: Annual Wages in Nebraska, Years 2001 - 2015



Source: Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015.

Chart 2: Hourly Wages in Nebraska, Years 2001 - 2015



Source: Nebraska Occupational Employment Statistics Employment and Wage Estimates, 2015.

(iii) Education and Skill Levels of the Workforce

By 2022, nearly 35% of the state's projected annual openings will require education beyond high school. For the period between 2012 and 2022, Nebraska's occupational employment is projected to increase by 9.54%. All of the educational attainment categories beyond high school are projected to experience a percent change that exceeds the statewide average, with a range from 12.18% for some college, no degree to 15.13% for master's degree. The highest number of annual openings for education levels beyond a high school diploma or equivalent will occur in occupations requiring a bachelor's degree with 5,652 openings followed by postsecondary non-degree award with 3,556 openings (*NEworks, Data Download Center: Projections Data Files, 2015*).

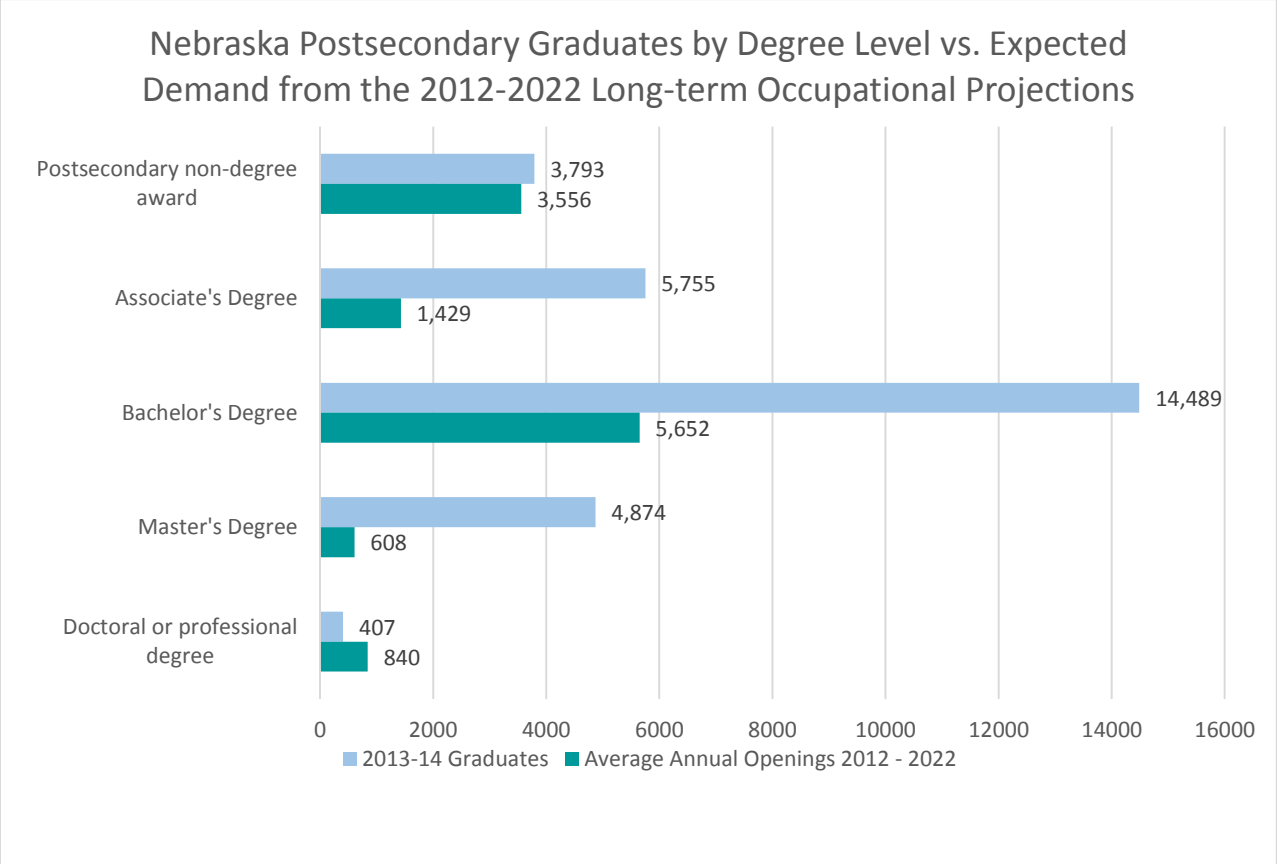
Table 13: Projected Employment by Education, 2012 – 2022

Education	2012 Estimated Employment	2022 Projected Employment	Growth Openings	Replacement Openings	Total Openings	Avg Annual Openings	Numeric Change	Percent Change
Doctoral or professional degree	26,019	29,230	3,211	5,184	8,395	840	3,211	12.34%
Master's degree	17,295	19,912	2,617	3,495	6,112	608	2,617	15.13%
Bachelor's degree	168,105	188,940	21,179	35,326	56,505	5,652	20,835	12.39%
Associate's degree	42,962	48,729	5,793	8,537	14,330	1,429	5,767	13.42%
Postsecondary non-degree award	106,029	121,063	15,083	20,497	35,580	3,556	15,034	14.18%
Some college, no degree	16,080	18,039	1,972	3,375	5,347	533	1,959	12.18%
High school diploma or equivalent	404,581	437,732	37,404	86,477	123,881	12,361	33,151	8.19%
Less than high school	290,335	310,013	23,895	88,642	112,537	11,254	19,678	6.78%
Source: NEworks, Data Download Center: Projections Data Files, 2015								

When the 2012-2022 occupational projections average annual openings were compared to the number of 2012-2013 graduates reported in the Integrated Postsecondary Educational Data System, the number of graduates completing degrees outpaced expected demand (see Chart 3). Yet, employers may have difficulty recruiting for specific occupations due to a mismatch of degree attainment and employer vacancies. A person with a bachelor's degree in philosophy may not have the educational background required to fill a mechanical engineering position.

Additionally, the labor market demand for graduates above the associate degree level is higher nationally and graduates may leave the state for employment opportunities requiring higher degrees (*Integrated Postsecondary Educational Data System, Nebraska institutions.)*

Chart 3: Postsecondary Graduates by Degree vs. Anticipated Occupational Demands



Source: Integrated Postsecondary Education Data System 2013-14 Completers file and Nebraska Department of Labor, Office of Labor Market Information 2012-2022 Long Term Occupational Projections.

Of special concern is the significant segment of Nebraska's population who lacks a basic education. According to 2010-2014 American Community Survey 5-year Estimates, there are 1,392,964 adults (age eighteen and older) in the state of Nebraska. Of this number, 9.8% or 136,510 persons have less than a high school diploma. Education remains a strong indicator of economic prosperity. Within Nebraska, nearly one in every four persons without a high school diploma (24.7%) live in poverty and the average median wage for a person with less than a high school diploma is $21,898 (*U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates*) – a figure that lags significantly behind the median wage across all industries within Nebraska $33,180 using Nebraska Occupational Employment Statistics Employment and Wage Estimates (2015). Nebraska's workforce system will maintain a strong focus on education and training so that workers within the state have the skills and knowledge necessary to earn a living wage.

As detailed in Table 14 (below), there is a particularly urgent need for Adult Basic Education and GED preparation among the state's growing number of Hispanics, as 46.8% lack a high school diploma. The greatest percentage of those without a high school education, among race groups, were Asian (24.9%), American Indian (24.2%), and Black (15.1%). Interestingly, the greatest percentage of those attaining a Bachelor's or Graduate or Professional degree was Asian (41.6%) when comparing race groups (*2014 American Community Survey 1-Year Estimates)*. Since individuals without a high school diploma or equivalent are at a distinct disadvantage in Nebraska's labor market, the need for services that focus on staying in school and high school diploma attainment is prevalent in all these subpopulations. Recruitment and enrollment of minority individuals in plan partners' programs is a constant priority and effort across the state.

Table 14: Educational attainment in Nebraska by Age, Race, Ethnicity, and Education Level

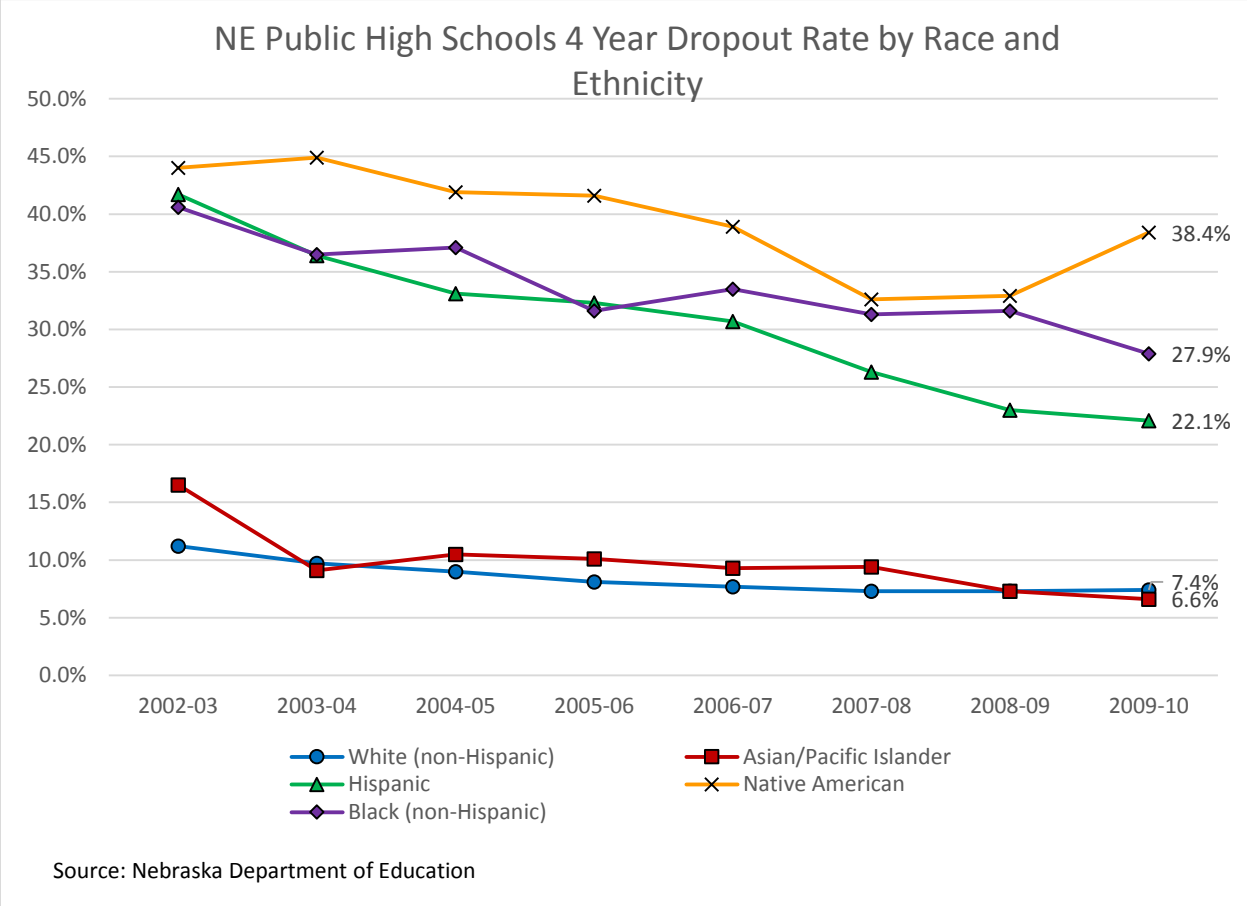
Age Over 25 Years	**Ethnicity**	**Race**				
Educational Attainment	Hispanic or Latino	White Alone*	Black or African American Alone	American Indian and Alaska Native Alone	Asian Alone	Two or More Races
Less than 9th grade	29.5%	3.6%	4.8%	12.8%	17.9%	4.8%
9th to 12th grade, no diploma	17.2%	4.8%	10.4%	11.4%	7.0%	9.2%
Regular high school diploma	18.6%	24.2%	20.5%	21.5%	12.4%	16.5%
GED or alternative credential	7.0%	3.4%	6.7%	7.2%	1.6%	6.0%
Some college, no degree	13.8%	23.4%	25.4%	23.7%	14.1%	24.3%
Associate's degree	3.5%	10.6%	8.0%	10.7%	5.4%	12.6%
Bachelor's degree	7.7%	20.8%	16.2%	6.6%	20.1%	16.7%
Graduate or professional	2.6%	9.2%	8.0%	6.1%	21.5%	9.9%
Source: U.S. Census Bureau, 2014 American Community Survey 1-Year Estimates, Sex by Educational Attainment for the Population 25 and Over.						

Note: The term "Alone" in the enclosed chart refers to those residents who identify themselves as belonging exclusively to a specific racial group.

The chart which follows includes the dropout rate within Nebraska public high schools measured by the percent of students in a freshman cohort who drop out of high school within four years. As shown, Native American students drop out at a rate of 38.4%, which is the highest dropout rate amongst all groups. Black students drop out at a rate of 27.9% and Hispanic students at a rate of 22.1%. These rates are alarmingly high, especially when compared to the 7.4% and 6.6% rates experienced by white and Asian/pacific islanders. Data show that not only is there a growing demand through 2022 for workers with education beyond high school, but also the

strong correlation between educational attainment and earnings. Efforts that target and support groups that experience high dropout rates are necessary to prepare these populations for gainful employment and to ensure strong workforce needed by employers.

Chart 4: Four Year Dropout Rate by Race and Ethnicity



Source: Nebraska Department of Education

According to U.S. Census estimates, in 2014 there were 85,805 or 4.9% of Nebraskans age 5 and over who speak English less than "very well." A majority (89.4%) of Nebraskans age 5 and over speak only English at home, but 10.6% (185,620) of Nebraskans speak a language other than English at home. Of those who do not speak English at home, 68.8% (127,832) Nebraskans age 5 and over speak Spanish or Spanish Creole at home. The U.S. Census estimates show that 46.4% of Nebraskans (86,127), age 5 and over, who do not speak English at home speak English less than "very well." This deficiency in English speaking points to a need for English as a Second Language education. This will enable limited English speakers more opportunities in the workplace (*U.S. Census Bureau, 2014 American Community Survey 1-Year Estimates*).

The U.S. Census estimate of those age 5 and over who do not speak English at home and speak English less than "very well" increased from 81,310 Nebraskans in 2013 to 86,127 in 2014 (*U.S. Census Bureau, 2014 American Community Survey 1-Year Estimates*). According to 2013 U.S. Census estimates there were seven languages/language groups that have more than 1,000 speakers in the state who speak English less than "very well." The estimated number of people

in 2013 that speak another language and speak English less than "very well": Spanish or Spanish Creole, 57,286; Vietnamese, 4,627; African languages, 2,657; Chinese, 2,611; Other Asian languages, 2,365; Arabic, 1,767; and French (including Patois, Cajun), 1,438. These seven languages/language groups account for 89.5% of all the state's population who speak English less than "very well" (*U.S. Census Bureau, 2013 American Community Survey 1-Year Estimates*).

English as a second language (ESL) instruction is offered in Adult Education programs throughout the state. Instruction ranges from serving persons with no literacy skills in their native language to those who possess advanced degrees in their native language; from survival skills to preparation for the GED test. The average enrollment of ESL learners makes up approximately 40-44% of the total adult's served in the Adult Education program in Nebraska.

In addition, individuals with limited-English proficiency receive the language assistance necessary to afford them meaningful access to workforce programs, services and information. Many Career Centers have bilingual staff members and access to language lines to assist limited English speaking customers. Nebraska contracts with LanguageLine Interpretation Service to eliminate language barriers that may prevent non-English speaking populations from applying for assistance and accessing services, as well as conducting career exploration. In addition, many employers have utilized Nebraska's Worker Training Grants to offer English/Spanish training for supervisors and staff in the workplace.

(iv) Skills Gaps

A major concern among employers in the state is the availability of qualified and skilled workers. A 2013 statewide survey conducted by the Nebraska Chamber of Commerce and Industry found that of the 1200 respondents, more than half, 52%, stated that they have experienced difficulties in hiring qualified employees over the previous 12-month period. These concerns were reinforced throughout a series of three focus groups that took place during 2015 to collect input for the enclosed plan. Most prevalent among these responses were the need for employees with work readiness skills and a strong willingness among employers to participate more fully in the workforce system.

A 2012 report by the National Skills Coalition found that 58% of the jobs within Nebraska in 2012 were medium-skill jobs and 28% were high-skill jobs ("*Middle Skills Jobs State by State," 2012*). Collectively, this represents 86% of Nebraska's workforce.

The National Skills Coalition defines medium-skill jobs as those jobs that require education beyond high school but not a four-year degree (e.g., associate degree, certificate/credential, or on-the-job experience). This includes such jobs as clerical, sales, construction, installation/repair, production and transportation/material moving and other jobs similar to those detailed in Table 5 ("2012-2022 Occupational Projections Top 10 Most Annual Openings for Postsecondary Non-Degree Award Education Level with Entry Wages"). The 2012 report also found that the demand for medium-skill jobs is expected to remain strong through 2022, when it is anticipated that 51% of all Nebraska jobs will entail occupations requiring medium skill, at minimum. Further, there is a present gap between the needs of employers and an available qualified workforce: despite 58%

of jobs 48% of the state's workforce possessed the requisite skills to qualify for these middle-skills job.

The study identified high-skill jobs as those jobs that require a postsecondary degree, to include professional/technical and managerial occupations and typically require a bachelor degree or advanced training. The 2012 National Skills Coalition report shows that by 2022 one in every five jobs, or 20%, will be in high-skill occupations.

In addition to job-specific and technical skills, employers within Nebraska have expressed a need for newly hired individuals to have work readiness skills. The Office of Labor Market Information surveyed businesses to determine the top O*NET skills needed by employers in the 2010 New Hires Survey. Required job skills were compared to the skills of newly hired employees. Within the top 10 skills, the top 6 matched on the new employee and required job skills rankings in order of importance. The next four skills matched but were ranked differently in priority.

(2) Workforce Development, Education and Training Activities Analysis

The State of Nebraska is proud to offer a business environment that provides resident jobseekers gainful, meaningful employment within industries that are essential to a thriving Nebraska economy. In this effort, Nebraska's workforce system relies upon the collaborative efforts of its partners including the American Job Centers and other public and private agencies situated throughout the state.

Collectively, these partners seek to ensure a comprehensive network of interrelated services addressing a wide spectrum of jobseeker and employer needs. Categorically, these entail seven major service areas, including *(1) Assessment, (2) Classroom Training, Work-Based Training and Instruction, (3) Education, (4) Industry Credentialing and Certification, (5) Supportive Services, (6) Employment Services* and *(7) Business Services*. These services are described below and detailed in the enclosed table.

1. **Assessments** are administered by the Nebraska's workforce investment partners according to the needs of their clients in order to gauge career interests, measure basic skills, identify specific job competencies, assess English and basic education literacy (i.e., ABE, ESL/GED), evaluate specific functional skills, and determine eligibility for public assistance. These tests collectively are designed to help the partnering programs understand the individualized needs of each worker in order to initiate targeted career interventions and supports. Developing a talent pipeline in high-demand industries is essential to serving the needs of the workforce system's two primary customers, workers and employers. A strong battery of targeted assessments ensures that jobseekers are provided appropriate services as part of an individualized, sustained workforce strategy.
2. **Classroom Training, Work-Based Training and Instruction** entail both short- and long-term options to ensure jobseekers are equipped with the work readiness skills and technical skills necessary to succeed within the demanding workplaces of the 21st Century. This includes occupational skills training, short-term on-the-job training, customized job training, job readiness training, actual work experience, incumbent

worker training, and disability skills training. Connecting its clients with an array of dynamic occupation-specific training and instructional options to meet ever changing industry requirements is an essential component of the state's workforce strategy. These ensure that jobseekers are prepared to meet industry demands and that companies have access to the skilled workforce needed to compete in the global economy.

3. **Education** is available throughout the workforce system to provide foundational education and subject matter knowledge. This includes academic and foundation skills, corrections education, GED or high school equivalency diploma, postsecondary preparation, career pathways foundations, work readiness skills, basic literacy, computer literacy, and English-as-a-Second Language instruction. The foundational knowledge imparted through workforce system's education services form a basis that is applicable across a range of industries and occupations. Workforce partners work with K-12, public and private postsecondary institutions and other education and training providers to connect jobseekers with education opportunities aligned to their specific needs.
4. **Industry Credential and Certification** encompasses the General Educational Development (GED) credential or high school equivalency credential as well as continuing education, occupational licensure, and industry certifications to provide industry-recognized credentials for entry and advancement within specific industries and occupations, particularly those high-wage, high-skill, high-demand industries and occupations that are essential to Nebraska's economy.
5. **Supportive Services** are designed to address barriers to employment. This includes the provision of such services as child care, transportation, relocation assistance, clothing, coaching, scribes, insurance coverage, utility and rent deposits, emergency financial assistance and other supports. Cognizant of the imposing barriers to employment facing disadvantaged populations within Nebraska, the workforce system offers a wide network of supports that mitigate these challenges in order to maximize workforce participation rates amongst these populations, which represent a widely untapped talent pool.
6. **Employment Services** include career planning and career counseling, labor exchange and placement services, job seeking support, job readiness training and workshops, networking and peer counseling, as well as assistance for the self-employed. These services are delivered at all stages of the employment process to new workers and the unemployed as well as incumbent workers to connect workers with potential employers and ease the transition into the workplace.
7. **Business Services** will address employers' needs through job fairs, hiring events and industry networks, compliance in meeting Americans with Disabilities Act, Section 503 and other workplace requirements, employer incentives, and worksite modifications to accommodate the needs of individuals with special workforce needs. These services are ultimately designed to support business growth and further meet industry workforce needs.

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Workforce Development Activities Delivered by Nebraska's Core Programs	Wagner-Peyser Act	WIOA Title I	Adult Basic Education & Adult Secondary Education	Vocational Rehabilitation	Commission for the Blind & Visually Impaired
Assessments	•	•	•	•	•
Career Interest	•	•	•	•	•
Basic Skills		•	•	•	•
Community- and Job-Based Evaluations				•	•
English-as-a-Second Language (ESL)			•		
Functional Skills				•	•
Classroom Training, Work-Based Training & Instruction	•	•	•	•	•
On-the-Job Training		•		•	•
Work Experience		•		•	•
Work-Based Training		•	•	•	•
Job Readiness Training	•	•	•	•	•
Incumbent Worker Training		•		•	•
Disability Skills Training				•	•
Customized Job Training		•	•	•	•
Education	•	•	•	•	•
Academic/Foundation Skills			•	•	•
Preparation for Postsecondary Education		•	•	•	•
Distance Education			•		
Career Pathways/Work Readiness Skills	•	•	•	•	•
Computer Literacy			•		•
English-as-a- Second Language		•	•	•	•
Industry Credential and Certification		•	•	•	•
General Educational Development (GED) Credential			•		
Post-Secondary Credentialing		•	•	•	•
Licensure				•	
Supportive Services		•		•	•
Transportation, child care, personal care assistance, relocation assistance, emergency financial assistance (e.g., rent deposits, utilities, care repairs), application fees, benefits planning, etc.					
Employment Services	•	•	•	•	•
Career Planning and Career Counseling	•	•	•	•	•
Labor Exchange and Placement Services	•	•		•	•
Job Seeking/Job Readiness Skills	•	•	•	•	•
Networking/Peer Counseling (Job Clubs)		•		•	•
Self-Employment				•	•
Business Services	•	•	•	•	•
Job Fairs/Hiring Events/Networks	•				
Regulatory Compliance (ADA, 503, Federal Contracting)	•			•	•
Employer Incentives	•			•	•
Worksite Modification				•	•

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Nebraska and its workforce partners have established and maintained a broad network of services as part of its strategy to create a strong workforce system. Embedded within this system, however, are several strengths and weaknesses identified as follows. These strengths and weaknesses have been accounted for through the vision, goals and specific outcomes guiding Nebraska's Combined State Plan.

Key Strengths include:

- ***NEworks, Nebraska's Management Information System,*** equipping the combined plan partners with a powerful technological tool that offers a wealth of workforce data as well as resources for both employers and current/prospective workers. Beyond its present use, this technology can serve to potentially improve coordination of program services, enhance communication between partners, and track relevant participant outcomes.
- A ***comprehensive range of high-quality workforce development services***. From initial assessment to job placement, the combined plan programs offer an array of high-quality, targeted services that are geared toward the needs of the state's employers and those seeking employment.
- ***Cost-efficiency in the delivery of services***. Despite geographic, financial, programmatic and other constraints, the plan partners have cost-efficiently delivered their services to jobseekers and workers throughout the state. The extent to which these entities have continually maximized the quality and reach of their services is a strength that is capitalized upon in the combined plan.
- ***Strong partnerships between plan partners*** as well as public and private partners. The strength of these partnerships is evident in their strong contributions to the design and execution of this plan, as described throughout this document, as well as the strength of the existing collaborations between partners.
- And **a strong *technology infrastructure*** that is capable of supporting the business growth and expansion targeted through the combined plan. A 2014 report by the Nebraska Information Technology Commission found that Broadband service, with download speeds of greater than 10Mbps, is available to 99.5% of the state's population (*Broadband in Nebraska, 2014*). Widespread access to broadband given the geographic challenges in an expansive state with several rural areas is a tremendous strength that will be leveraged throughout the implementation of the Combined Plan.

Collectively, these strengths form a tremendous foundation upon which Nebraska's state plan is designed and anticipated to flourish.

Key Weaknesses limit the partner programs' ability to better serve the needs of its workforce customers. These weaknesses include:

- ***Widespread dispersion of various populations within the state.*** The placement of Nebraskans who face barriers to employment (e.g., low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who have aged out of the foster care system; English Language Learners; individuals with low levels of literacy;

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single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; and the long-term unemployed) present unique challenges in communicating and coordinating services to areas where these populations reside. This includes remote rural areas, areas with capacity issues and those affected by other factors that complicate workforce service delivery.

- ***Limited industry sector involvement in the workforce system.*** There is a strong willingness among both industry and the public sector to work collaboratively in promoting workforce development within the state. Yet, more needs to be done in order to formalize and leverage the potential contributions of the industry sector.
- ***Need to strengthen communication between workforce partners***. Despite the availability of high quality programs and a willingness to collaborate, the partner programs sometimes struggle to communicate in a timely fashion in order to coordinate programming and avoid duplication of efforts. This is especially true at the front-line service-delivery level.
- ***Absence of a common intake form*** and intake procedures results in a duplication of efforts and is indicative of the previously mentioned lack of communication that currently exists between programs.
- ***Common terminology for key workforce development terms*** is yet another source of weakness that disrupts communication and understanding necessary for an effective, efficient statewide workforce strategy.

Each of the partnering workforce entities represented within this plan possess a modernized technological infrastructure, committed staff and a strong willingness to strengthen workforce development within the state. The capacity for increased communication between Nebraska's workforce development programs is extremely strong. Technologically, Nebraska has the tools necessary to foster increased communication including data sharing and a willingness amongst the programs' staffs to improve in this area of great need.

(b) Nebraska's Strategic Vision and Goals

(1) Vision

In the midst of a labor market that is rapidly changing and an economy that is becoming increasingly more global in scope, the great state of Nebraska and its workforce development partners face an array of imposing challenges to maintain a thriving economy. These challenges, which range from labor shortages in demand industries to ever-changing industry standards to employment barriers for underrepresented populations, must be met in order to create a business environment that sufficiently serves the needs of both jobseekers and employers alike. Nebraska's vision represents the collective expertise of the strong and committed network of workforce development partners to establish a workforce system within Nebraska that maximizes the collective resources available within the state workforce system, recognizes the unique characteristics and needs of the state's diverse geographic regions, provides (whenever and wherever available) competitive advantages to business, and positions Nebraska economically for global competitiveness.

Nebraska's vision for its workforce system maintains a dual-customer focus amongst the partner programs by (1) seamlessly administering services to jobseekers at all stages of the employment spectrum *and by* (2) furnishing employers with the skilled workforce they desperately need to grow and thrive in a global economy. This includes employment, re-employment and advanced employment for Nebraska workers.

Primary to this vision is strong communication between partnering programs as well as other workforce development entities throughout the state in order to streamline services and foster coordinated strategies in meeting the needs of the workforce system's two primary customers, employers and workers.

Central also to this vision is maintaining a strong understanding of employers' specific workforce needs and developing proactive strategies that respond to these needs with timely and targeted interventions. Given the rapid changes that frequently occur within the current global economy, Nebraska's workforce system must remain fully aware of the specific experience, education, and credentials, as well as skills and competencies required within the state's high-demand industry sectors. It must also strengthen career pathways into these industries through enhanced access, services, education and training options. The state's vision therefore relies upon strategies that respond to these needs of its employers, including sector-specific strategies.

Cognizant of ever-increasing capacity constraints across programs, Nebraska's vision for workforce development entails a collaborative effort where partnering programs leverage the collective resources of the state's workforce partners as a whole. This will allow for the sharing of resources more freely and realization of efficiencies in service delivery resulting in increased economic impact.

Meeting the imposing challenges facing Nebraska's workforce system is essential to ensuring that jobseekers and employers within Nebraska are provided with an environment that meets their unique workforce needs. Embedded within these challenges, however, are vast opportunities to enhance Nebraska's strong track record in providing both businesses and jobseekers alike with an environment that supports business growth and promotes gainful employment for all Nebraska residents.

(2) Goals

In support of Nebraska's vision for a unified, systematic approach to workforce development, four major goals have been identified to prepare an educated and skilled workforce that meets the workforce needs of employers through 2020. These four goals articulate a coordinated approach and seek to establish an economic climate that serves employers, workers and those communities where these stakeholders operate and work, respectively.

Developed with significant input from key stakeholder groups, these goals respond to the identified capacity gaps and weaknesses within Nebraska's workforce system as described; build upon the strengths of the partnering programs; meet present and anticipated challenges and labor needs; account for the unique workforce characteristics within Nebraska and its workforce

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regions, and establish a climate that serves the workforce system key stakeholders. Most notably this includes the preparation of an educated and skilled workforce and meeting the workforce needs of Nebraska's employers

> ***Goal 1:*** Nebraska *will* enhance coordination between plan partners and other key stakeholders at all stages of the workforce development spectrum to ensure jobseekers and businesses are provided coordinated and seamless services, reducing duplication of effort, better understanding the needs of employers and workers, and maximizing the resources available to the state's workforce partners.
> ***Goal 2:*** Nebraska *will* increase workforce participation across Nebraska by expanding access, support and service to assessment, education, training, employment services and other forms of assistance that prepare low-income individuals, English Language Learners, single parents, farmworkers, the unemployed and other disadvantaged populations for rewarding careers within the region.
> ***Goal 3:*** Nebraska *will* enhance employer engagement between secondary and post-secondary education and/or training programs to better meet employers' workforce needs through industry-driven strategies that ensure the availability of the skilled workforce to drive growth within the state's high-wage, high-skill and high-demand industries and occupations.
> ***Goal 4:*** Nebraska *will* promote self-sufficiency among Nebraska's disadvantaged populations by eliminating barriers to employment and providing coordinated services that lead to gainful employment.

The achievement of Nebraska's vision and goals will be anchored by implementing and bringing together Public Sector and Industry Sector Partnerships. Draft concepts on how these partnerships may work are illustrated in the following two diagrams.

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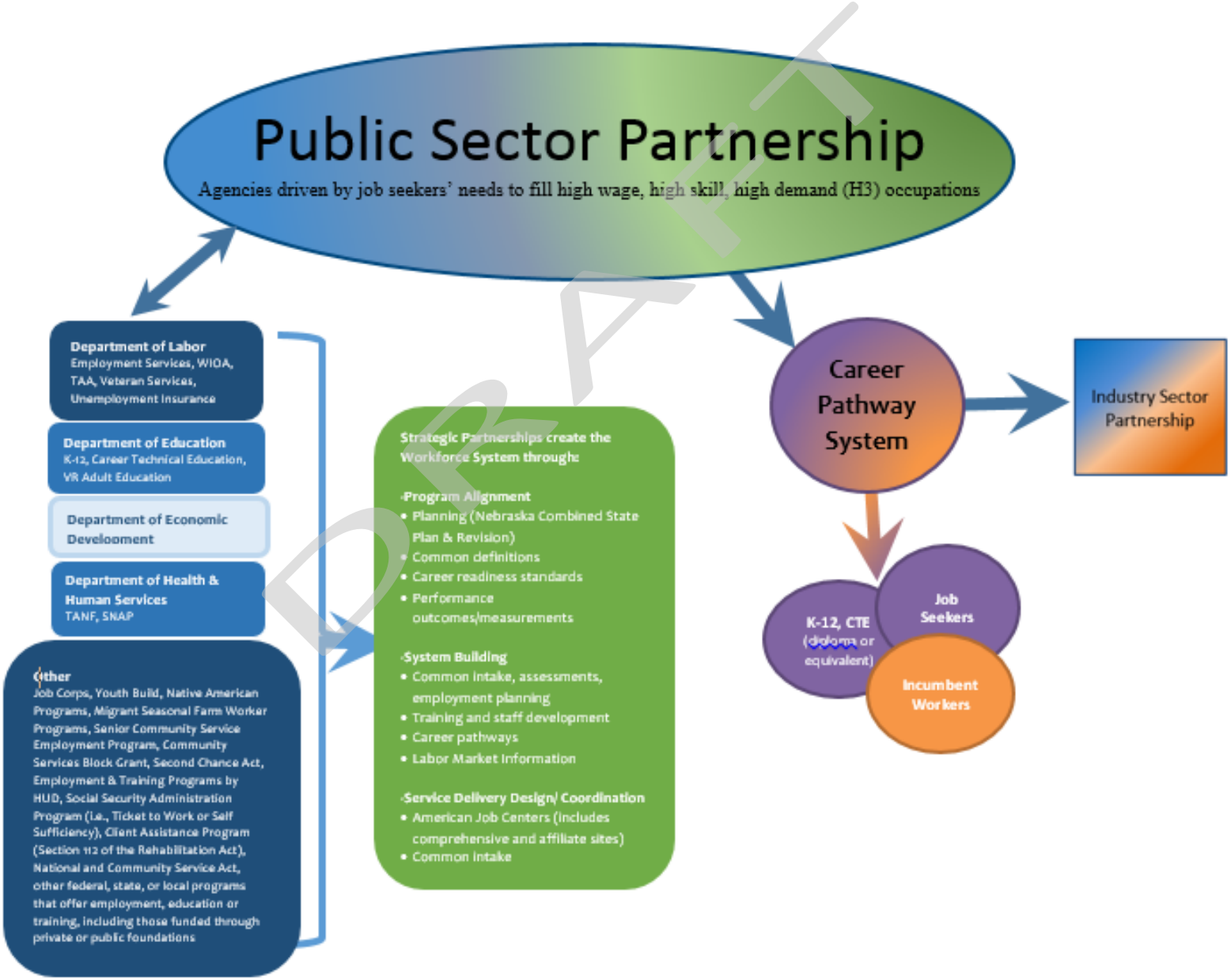
Public Sector Partnership
Agencies driven by job seekers' needs to fill high wage, high skill, high demand (H3) occupations
Department of Labor
Employment Services, WIOA, TAA, Veteran Services, Unemployment Insurance
Department of Education
K-12, Career Technical Education, VR Adult Education
Department of Economic Develoement
Department of Health & Human Services
TANF, SNAP
Other
Job Corps, Youth Build, Native American Programs, Migrant Seasonal Farm Worker Programs, Senior Community Service Employment Program, Community Services Block Grant, Second Chance Act, Employment & Training Programs by HUD, Social Security Administration Program (i.e., Ticket to Work or Self Sufficiency), Client Assistance Program (Section 112 of the Rehabilitation Act), National and Community Service Act, other federal, state, or local programs that offer employment, education or training, including those funded through private or public foundations
Strategic Partnerships create the Workforce System through:
-Program Alignment
• Planning (Nebraska Combined State Plan & Revision)
• Common definitions
• Career readiness standards
• Performance outcomes/measurements
-System Building
• Common intake, assessments, employment planning
• Training and staff development
• Career pathways
• Labor Market Information
-Service Delivery Design/ Coordination
• American Job Centers (includes comprehensive and affiliate sites)
• Common intake
Career Pathway System
Industry Sector Partnership
K-12, CTE (diploma or equivalent)
Job Seekers
Incumbent Workers

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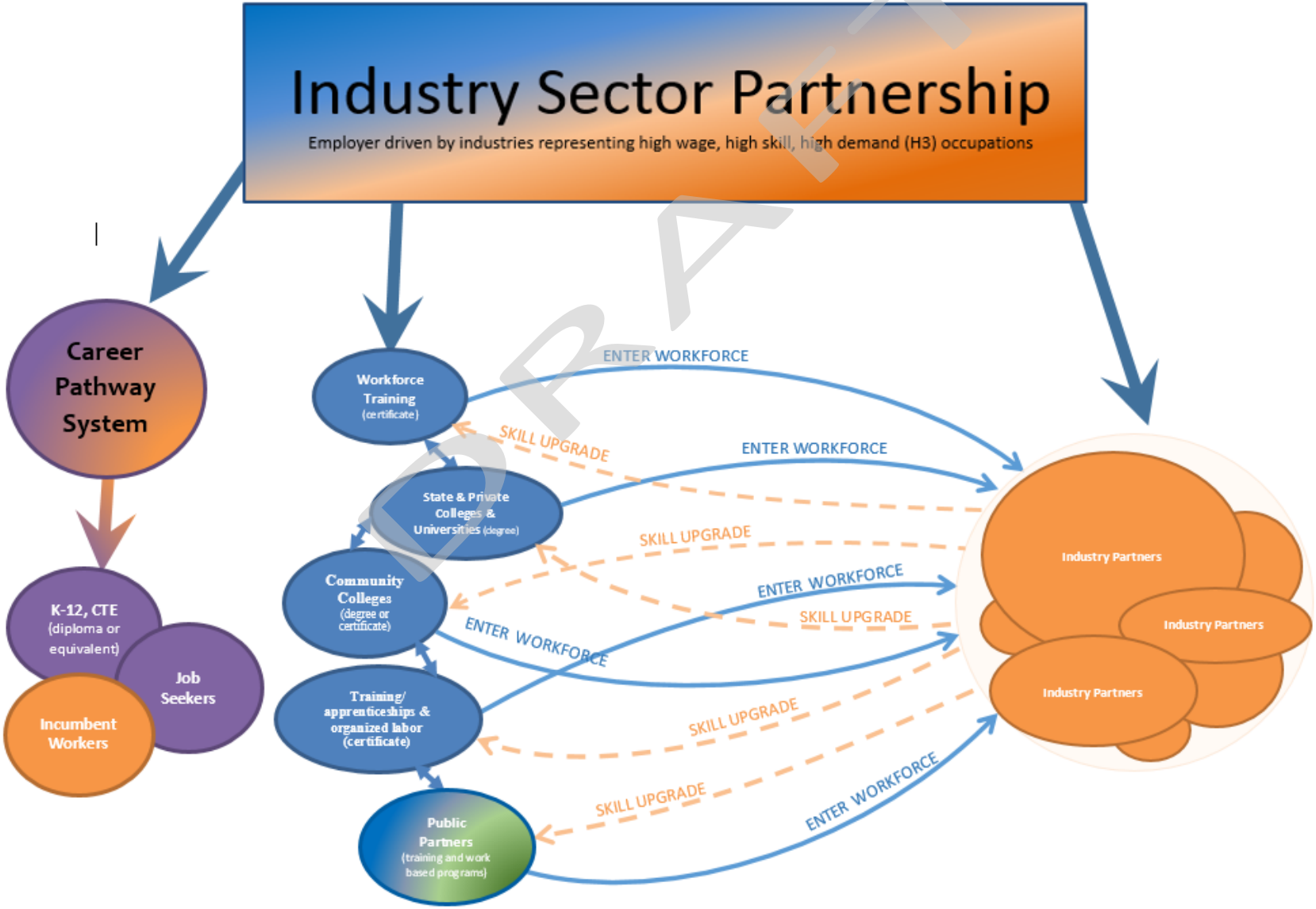
Industry Sector Partnership
Employer driven by industries representing high wage, high skill, high demand (H3) occupations
Career Pathway System
K-12, CTE (diploma or equivalent)
Job Seekers
Incumbent Workers
Workforce Training (certificate)
State & Private Colleges & Universities (degree)
Community Colleges (degree or certificate)
Training/ apprenticeships & organized labor (certificate)
Public Partners (training and work based programs)
ENTER WORKFORCE
SKILL UPGRADE
ENTER WORKFORCE
SKILL UPGRADE
ENTER WORKFORCE
SKILL UPGRADE
ENTER WORKFORCE
SKILL UPGRADE
ENTER WORKFORCE
Industry Partners
Industry Partners
Industry Partners

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The following sections of the Combined State Plan outline the specific strategies to be implemented in addressing the stated vision and goals, and also include a plan for assessing progress toward their attainment. Operational plans for each of the plan partners are included to show further alignment with the Combined Plan.

(3) Performance Goals

The Performance Goals for the 2016 and 2017 program years, as described in section 116(b)(2)(A) of WIOA, will be negotiated with the Secretary of Labor in conjunction with the Secretary of Education. A plan for assessing the progress made toward the measures to be established is described in the following section "Assessment."

(4) Assessment

Assessment of the partner programs' progress toward these goals will entail the collaborative efforts of the core programs and other plan partners in order to collect and analyze timely data and make, as necessary, strategic modifications in order to maintain progress toward its vision, goals and strategies as described.

In assessing progress, data will be identified, collected in appropriate frequencies, and analyzed by the core programs, combined plan partners, and relevant stakeholders including the Nebraska Workforce Development Board. Data to be collected will include employment rates, median earnings, credential attainment rates, measurable skills gains, H-1B visa application data, and other data to indicate progress and support the management of the workforce system. In reviewing the data, the partners will seek to identify in a prompt fashion any negative trends or gaps in the performance measures in order to initiate the necessary program refinements as part of a continuous improvement approach.

(c) State Strategy

(1) Strategies

Nebraska's combined plan partners have identified several interrelated strategies to achieve its strategic vision and goals. As described in the previous section, Nebraska's vision is a streamlined workforce system that meets the needs of both employers and workers. To support this vision, the state has developed a series of strategies to support each of the Plan's four goals.

Goal 1: Nebraska *will* enhance coordination between plan partners and other key stakeholders at all stages of the workforce development spectrum to ensure jobseekers and businesses are provided coordinated and seamless services, reducing duplication of effort, better understanding the needs of employers and workers, and maximizing the resources available to the state's workforce partners.

- *Strategy #1: Development of common intake procedures*. The plan partners will work closely to explore, develop, test and refine common intake procedures that integrate the intake process across the programs. The effort to establish a common intake will increase coordination between the plan partners to identify what information is

currently being collected and what should be shared. Privacy laws will be regularly analyzed and observed throughout this process to ensure the protection of human subjects and meet federal laws.

- *Strategy #2: Development and alignment of terminology across programs.* The establishment of common terminology across programs is not only essential to a common intake, but it is also necessary to foster greater coordination among the partner programs at all stages of the service-delivery spectrum.
- *Strategy #3: Coordination of funding streams.* Nebraska's Combined State Plan is designed to serve a broad range of jobseekers and employers. To effectively serve these workforce customers, Nebraska must strategically align and utilize all of its resources in order to effectively reach all customers with appropriate levels of service and support. A significant portion of this strategy will take place throughout the Memorandum of Understanding process.
- *Strategy #4: Technological integration*. The alignment of data systems will be necessary to foster data sharing in order to provide the real-time data necessary to initiate appropriate services, assess service delivery, complete WIOA common reporting requirements, and the subsequent program refinements necessary for continuous project improvement.
- *Strategy #5: Development of policies around common subject matter in order to define protocol and provide guidance across partner programs.* Given the enhanced level of coordination to occur, policies will be developed that specify clear courses of actions, set clear expectations, guide decision-making and support outcomes.
- *Strategy #6: Collaborative assessment of systems to ensure continuous improvement.* As part of a more coordinated approach to workforce development, the plan partners will meet regularly for planning purposes, information sharing, resource leveraging and continuous system improvement. Using data generated by the plan partners' individual data systems, the partners will assess progress, identify trends and gaps (negative or positive), and determine what, if any, additional strategies are necessary.
- *Strategy #7: Establishment of a Public Sector Partnership* involving each of the plan partners, to support the alignment of workforce policies, systems, and terminology within the state. Functioning as a working committee, the Public Sector Partnership will provide the shared governance, day-to-day coordination and leadership needed to guide enhanced workforce development partnerships among public sector programs.
- *Strategy #8: Coordination with local and regional areas* in order to further strengthen workforce alignment and coordination across the State. This will include outreach and coordination with the American Job Centers, eligible training providers and other local workforce programs to enhance service to employers and jobseekers, especially those who face barriers to employment, and/or individuals with low literacy and individuals with disabilities.

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Goal 2: Nebraska *will* increase workforce participation across Nebraska by expanding access, support and service to assessment, education, training, employment services and other forms of assistance that prepare low-income individuals, English Language Learners, single parents, farmworkers, the unemployed and other disadvantaged populations for rewarding careers within the region.

- *Strategy #1: Sector strategies will be developed and implemented.* Nebraska is working to develop a replicable framework for supporting the implementation of industry sector strategies within the state. Strategies will focus on industries that are essential to the economic vitality of the state's communities and regions, support and strengthen businesses within the state, and offer employment opportunities to residents (with priority on low-income individuals, English Language Learners, single parents, farmworkers, the unemployed and other disadvantaged populations).
- *Strategy #2: Promotion of "H3" jobs.* Nebraska will leverage its recently developed H3 website (H3.ne.gov) to provide information to students, unemployed, underemployed and new workers on high-wage, high-skill and high-demand jobs in Nebraska. This will include working closely with each of the plan partners and other potential workforce partners (from the private and public sectors) on the website's resources and utility as part of a local, regional and statewide workforce development strategy.
- *Strategy #3: Targeted distribution of available funding streams*. The state and its workforce systems partners manage several funding streams that are designed to support entry into the workforce through the provision of training, education and other services. Review and alignment of these resources will occur both on an agency and statewide level to identify funding gaps and reallocate resources, if necessary, to better address the needs of such populations as low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who have aged out of the foster care system; English Language Learners; individuals with low levels of literacy; single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; and the long-term unemployed.
- *Strategy #4: Development of Career Pathways.* Nebraska careers are organized into six career fields covering 16 career clusters. This model, which is co-sponsored by the Nebraska Departments of Education and Labor, Nebraska Vocational Rehabilitation, Partnerships for Innovation and the Nebraska Public Power District, provides a framework and associated resources for students, educators, parents, adults, employers and workforce development agencies to support career development. Ongoing development and integration of this tool across programs will occur to help ensure Nebraska's future workforce possesses the skills, training and knowledge sought by employers.
- *Strategy #5: Fostered alignment of education, credentialing and placement.* Nebraska's plan to increase workforce participation involves multiple strategies including sector strategies and career pathways. Alignment of these resources with

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other resources that support workforce entry will be addressed. This specifically includes new and emerging workforce needs, such as those presented by new and emerging industries, regional demand, population dynamics and other factors. Coordination will include ongoing identification of workforce needs and opportunities, alignment education and training options (and resources that promote their accessibility), and the defining of workforce requirements.

- *Strategy #6: Acquisition of new funding streams and the leveraging of new resources to enhance services available to those seeking first-time employment and reemployment and Nebraska's working poor.* Plan partners will seek grant and other funding opportunities available at the federal and local areas that address the needs of unemployed and future workers through enhanced training, education and access. This strategy will also entail the development of partnerships with nonprofit and workforce entities throughout the state to share resources and provide support to maximize their efforts.
- *Strategy #7: Working closely with each WIOA-designated region to assess and refine the delivery of services* in order to establish a service delivery model that is responsive to the needs of jobseekers and employers, is accessible given the unique challenges faced by residents within the area, is capable of fully leveraging the resources available at the local, state, and federal levels, and is coordinating with other public and private workforce entities to maximize impact.

Goal 3: Nebraska *will* enhance employer engagement between secondary and post-secondary education and/or training programs to better meet employers' workforce needs through industry-driven strategies that ensure the availability of the skilled workforce to drive growth within the state's high-wage, high-skill and high-demand industries and occupations.

- *Strategy #1: Develop Industry Sector Strategies for employers to collaborate with system partners.* The state needs to ensure that the limited resources available for education, training and career development are closely aligned with the industry sectors that are essential to the state's existing and emerging occupations. Partners in Nebraska's workforce system must enhance their ability to engage meaningfully with employers within the industry sectors by ensuring there are effective forums for employers to collaborate with each other and to work with the workforce system's partners. The state will forge private sector partnerships with employers through state and local human resources associations and industry-specific associations and groups.
- *Strategy #2: Data-driven decision making that targets* high-wage, high-skill and high-demand *jobs.* Using timely Labor Market Information, employment projections and information gathered directly from employers, the partner programs will devise strategies to ensure Nebraska businesses have the talent needed to thrive in a global economy. This may include new and customized training options, work-based learning opportunities, collaboration with state and local economic development

agencies to implement industry sector strategies, and other initiatives that respond to the needs presented in the data and expressed directly by employers.

- *Strategy #3: Promoting career readiness.* Skills gaps will be identified regularly during the execution of the four-year plan using the Nebraska Career Readiness Standards established by the Nebraska Department of Education with extensive input from businesses and industries. Addressing these skills will entail identification of the specific skill set, inventory of available education and training to address the skill, promotion of the skill (cross-referenced to the industries and fields where it is desired) through the H3 website and Nebraska's Career Education Model, and, if necessary, rapid development and deployment of trainings that address the skills need.
- *Strategy #4: Continuous improvement in workforce development strategies* in order to better meet the needs of the Nebraska businesses. A variety of data, including performance metrics data, H-1B visa data, and employer surveys will be analyzed to assess the overall effectiveness of Nebraska workforce system in meeting the workforce needs of Nebraska's employers. This process will be initiated to foster continuous improvement.
- *Strategy #5: Expansion of work-based learning opportunities*. The plan partners will promote apprenticieships , internships and other work-based learning opportunities as an essential component of a comprehensive approach to workforce development in the state. Work-based learning offers potential workers with the opportunity to immerse within a potential career field while also providing invaluable education and training in a particular field.
- *Strategy #6: Targeted outreach to disadvantaged populations* such as low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who have aged out of the foster care system; English Language Learners; individuals with low levels of literacy; single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; and the long-term unemployed. Strategies will be designed to provide employers with an expanded labor pool of talented workers and to provide appropriate education, training and support to those populations that would most benefit from employment in Nebraska high-wage, high-skill, high-demand industries.

Goal 4: Nebraska *will* promote self-sufficiency among Nebraska's disadvantaged populations by eliminating barriers to employment and providing coordinated services that lead to gainful employment

- *Strategy #1: Enhanced access to available services.* Work collaboratively with American Job Centers and other programs throughout the state to strategically serve the needs of low-income individuals and other populations facing barriers to employment within the state. This strategy will include continued development of online resources and identification and dissemination of best practices.

- *Strategy #2: Targeted acquisition of funding and other resources.* Plan partners will pursue funding opportunities through local, regional and federal sources in order to expand the workforce resources available to low-income, English Language Learners, individuals with disabilities, migrant farmworkers and other populations experiencing barriers. This will include opportunities that strengthen coordination between the partners. It will also include working closely with individual regions and programs to review and support applications targeting specific geographic regions.
- Strategy #3: *Continued development and dissemination of online resources*. This will entail efforts that promote access and the distribution of essential workforce-related information to individuals facing barriers to employment. This will include the development of online information and training American Job Centers staff and other partners within communities throughout Nebraska to utilize the information available online. Access of this information will be a priority. As appropriate, resources will be available in English, Spanish and other languages. Cognizant of the technology barriers facing the disadvantaged populations to be served by this Plan, information will also be made available in print format.
- *Strategy #4: Enhanced data sharing and analysis amongst the plan partners.* The plan partners will utilize a variety of data to better understand the specific challenges facing low-income and other disadvantaged populations within Nebraska's workforce system. This data will be reviewed regularly in order to develop interventions of appropriate nature and scope, assess these interventions for effectiveness in supporting the targeted populations, and to implement a continuous improvement approach.
- *Strategy #5: Promote knowledge transfers across partner programs to help facilitate referrals.* This will include training to plan partner staff on services across programs administered by system partners. Further supporting this strategy, will be the development of cross-training materials that can be used by partners during orientation for new hires, and the development of a protocol for referrals between partners.

Sector-Specific Strategies and Career Pathways

Two major activities to occur over the course of the four-year plan that intersect several of the goals are Sector-Specific Strategies and Career Pathways.

<u>Sector-specific strategies</u> are designed to respond to the needs of employers within in-demand industry sectors, establish a pipeline of skilled workers for targeted industries, increase employment opportunities for unemployed and underemployed workers, and to establish a data-driven approach to addressing talent shortages. Sector strategies entail (1) Program Alignment; (2) System Building; and (3) Service Delivery Design/Coordination.

1) *Program Alignment* will include developing common goals and terminology necessary to guide the development of Nebraska's Sector Strategy state model. This will include strategic workforce planning, the alignment of terminology and associated definitions used between workforce development programs toward a

common understanding, the establishment of career readiness standards, and the identification of performance outcomes and measurements.

2) *System Building* will develop and continually refine resources and tools that can be utilized by regions as they implement the Sector Strategy model. This includes the development of common intake forms and assessments, stakeholder training and staff development, gathering and review of labor market information, and the identification of career pathways.
3) *Service Delivery Design/Coordination* will involve collaborative work with Nebraska's job centers in order to consistently administer the common intake form and begin the talent pipeline process by identifying students, underemployed workers, unemployed workers and incumbent workers with the potential to enter the identified career cluster talent pipeline.

Sector-specific strategies have been identified by the partner programs as a promising strategy to further promoting economic and workforce development in the state. To this end, representatives from each of the programs and other stakeholder groups have attended training in sector strategy development and execution, and are committed to continue developing strategies that meet the specific needs of employers and potential workers in Nebraska's in-demand industries.

Another promising strategy to support Nebraska's vision for workforce development is the ongoing development of **career pathways**. In 2008, the Nebraska Department of Education/Career Technical Education adopted and began implementing the National Career Pathway Model developed by the Office of Vocational and Adult Education. The Nebraska Career Education Model organizes Nebraska careers into six career fields including (1) Business, Marketing & Management; (2) Agriculture, Food, and Natural Resources; (3) Communication and Information Systems; (4) Human Services and Education; (5) Health Sciences and (6) Skilled and Technical Sciences. The six career fields entail a multitude of professions and jobs.

To support this career education model, Nebraska has established Career Readiness Standards which describe varieties of expertise that educators at all levels should seek to develop in their students. The Nebraska Career Readiness Standards were derived from extensive input from business and industry representatives expressing the most critical skills needed for employees to be successful on the job. Career Readiness Standards are often referred to as work readiness skills or soft skills. These standards rest on important "practices and proficiencies" with long-standing importance in career education. The standards and related practices are not limited to formal career technical education programs nor to the middle school or high school level. Rather, these standards and practices should be reinforced repeatedly, with increasing complexity and relevance by students and jobseekers as they progress through their career pathway. The standards themselves do not dictate curriculum, pedagogy or delivery of

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content, and schools, colleges, and service providers implement the teaching and assessing of these standards in many different ways.

The Career Pathway Model has been adopted by schools and school districts throughout the state to facilitate career exploration and planning as well as to guide the alignment of curriculum and education offerings. The former Nebraska Workforce Investment Board adopted the Career Pathway Model in 2008 to align work readiness services and career exploration with Nebraska's one-stop delivery system. The plan partners will work collaboratively to promote the adoption of this model and the Career Readiness Standards within education programs, update industry and skills requirements, and continuously assess the impact of the Career Pathway Model.

(2) Program Alignment

Nebraska has identified several strategies to align the core programs, combined plan partners, and other workforce partners to achieve a fully integrated approach to workforce development within Nebraska. These approaches will include increased coordination, enhanced data sharing, resource leveraging, career pathways, sector strategies, shared governance, alignment of technology systems, policy development and other reforms that guide and support the alignment to occur through the plan.

Key action steps include:

- Enhanced Memorandum of Understanding Process between the State and Local Areas.
- Collaborative Planning Process on System Development including common intake, shared technology, common service delivery.
- Establish Industry Driven Sector Strategy at the local and regional levels.
- Establish Public Sector Partnerships including all workforce system stakeholders.

III. OPERATIONAL PLANNING ELEMENTS

(a) State Strategy Implementation

(1) State Board Functions

The Nebraska Workforce Development Board under Section 101(d) of WIOA is responsible for maintaining a dynamic, demand-driven workforce system focusing on high-wage, high-skill, high-demand industries within a regional development context. This includes the integration of services to employers and job seekers by a network of public and private partners. The Board also works to meet the changing long and short term needs of businesses and individuals with a coordinated, efficient, and less bureaucratic delivery system, and to provide all Nebraska residents with the knowledge, skills and resources for learning, earning and living in the state.

Specific functions performed by Nebraska's Workforce Development Board under 101(d) of WIOA include:

- Develop and implement State Plan
- Provide recommendations to help align the workforce system in the state
- Increase activity in developing career pathways
- Unify workforce investment activities with education and supportive services in the development of career pathways
- Improve outreach and access to programs

- Develop strategies for meeting the needs of employers and jobseekers through sector partnerships (with an emphasis on in-demand industries and occupations)
- Develop and implement the one-stop system, including continuous improvement of the one-stop system
- Provide assistance to local boards, one-stop operators and their partners
- Assist with planning, including training and supportive services to workers, jobseekers, and employers
- Identify regions in consultation with the local boards and CEOs, and provides consultation to the Governor in the designation of local areas
- Assist the Governor in the development and updating of comprehensive state performance accountability measures, including state-adjusted levels of performance, to assess the effectiveness of the four WIOA core programs under 101(d)(4)
- Develop policies to coordinate services
- Develop criteria and procedures for local board to use in assessing core programs
- Develop guidance tom local boards on infrastructure costs and defining what one-stop partners must do to contribute to the services delivered through the one-stop system
- Define the role and contributions of one-stop partners, including equitable and efficient cost allocation
- Develop strategies to improve technology for digital literacy, accelerating learning, accessibility, and professional development
- Review the Combined State Plan at the end of the first 2-year period of any 4-year plan to submit modifications relating to labor market information, economic conditions, or other factors affecting the plan
- Help in designing the evaluations of State Programs under section 116(e)

(2) Implementation of State Strategy

(A) Core Program Activities to Implement Nebraska's Strategy

Nebraska's core programs and its combined plan partners have identified several key activities that will further extend employment services to disadvantaged workers, expand training and education options, and strengthen the alignment of resources across Nebraska's workforce system. The goals and supporting strategies are restated below and include a description of the specific activities to be conducted by the partners to execute the activities.

<u>Goal 1: Enhanced Coordination</u>

1. *Development of common intake procedures.*
2. *Development and alignment of terminology across programs.*
3. *Coordination of funding streams.*
4. *Technological integration.*
5. *Development of policies around common subject matter in order to define protocol and provide guidance across partner programs*
6. *Collaborative assessment of systems to ensure continuous improvement.*

7. *Establishment of a Public Sector Partnership.*
8. *Coordination with local and regional areas.*

The core programs with its additional plan partners will: provide leadership for the plan through the establishment of a Public Sector Partnership and through membership on the Nebraska Workforce Development Board; provide leadership and coordination for the development of a common intake system to streamline service delivery across the workforce system; leverage agency personnel and other resources to ensure appropriate support and oversight; implement evaluation and continuous improvement efforts; analyze current funding streams to inform potential reallocation for more targeted distribution; support efforts to integrate technological systems; and develop policies and procedures around common subject matter.

Goal 2: Increased Workforce Participation

1. *Sector Strategies will be developed and implemented.*
2. *Promotion of "H3" jobs.*
3. *Targeted distribution of available funding streams*.
4. *Development of Career Pathways.*
5. *Fostered alignment of education, credentialing and placement.*
6. *Acquisition of new funding streams and the leveraging of new resources to enhance services available to those seeking first-time employment, reemployment, and Nebraska's working poor*
7. *Working closely with each WIOA-designated region to assess and refine the delivery of services*

Increasing workforce participation will require the participation of each of the partner programs. This will entail the development of strategies that create new job opportunities and strategies that support the entry and retention of individuals in the workplace, including those workers who face barriers to employment. Initially, assessments will be administered by the respective programs to identify individual needs which will then trigger the prescription of services and supports to address the identified need(s). The provision of these services will be strengthened as a result of the increased coordination targeted through Goal 1, and more specifically through the common intake process which will streamline the initiation of services across the programs. These services entail a continuum of supports from education and training to workforce modifications.

Career Pathways will help prepare individuals with the requisite training and knowledge for a variety of career fields, to ease the transition to the workplace. Sector strategies will involve strategic partnership targeting key industries and occupations in a local, regional or state context. Sector strategies will support business growth but also foster new employment opportunities.

Enhanced data sharing will provide regional partners (including the American Job Centers, educational institutions, and training providers) with useful data to guide the strategic development of services and educational/training options. The state will work with these entities to not only use the data in a strategic manner but also to share in the exchange of data to inform

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the allocation of resources within the state and the development of new statewide workforce initiatives.

Within this process, the programs will continually collect and analyze program data. The assessment of data will serve to identify areas of strength and weakness. The information produced from regular analysis will help to initiate programmatic improvements and foster continuous improvement in serving those outside of the workforce.

Goal 3: Enhanced employer engagement between secondary and post-secondary education and/or training programs to better meet employers' workforce needs

1. *Data-driven decision making that targets high-wage, high-skill, high-demand jobs.*
2. *Promoting career readiness.*
3. *Continuous improvement in workforce development strategies.*
4. *Expansion of work-based learning opportunities.*
5. *Targeted outreach to disadvantaged workers.*
6. *Develop forums for employers to collaborate with system partners.*

Each of the combined plan programs will be critical partners in the effort to strengthen the alignment between education and training available in the state and the needs of employers. The strength of this alignment will rest primarily on the collection, sharing and analysis of relevant data that confirm current and emerging high-wage, high-skill, high-demand occupations and the associated skills sets needed for these jobs. High-wage, high-skill, high-demand jobs are essential factors in Nebraska's workforce development effort as they not only provide strong employment opportunities to a potentially large number of Nebraskans, but they also promote economic activity necessary to a thriving economy. The partners will work closely to identify high-wage, high-skill, high-demand jobs and work their various agency channels (including partners, electronic and print materials, etc.) to promote these career fields and coordinate services that help transition potential workers into these fields through education and training, employer services, accommodations and workforce modifications for those with disabilities, and/or support services to workers facing barriers.

Assessment of these strategies and approaches will be ongoing using data generated through Labor Market Information, employer surveys, employment projections and unemployment wage data.

Goal 4: Promote self-sufficiency among low-income and other disadvantaged populations

1. *Enhanced access to available services.*
2. *Targeted acquisition of funding and other resources.*
3. *Continued development and dissemination of online resources*.
4. *Enhanced data sharing and analysis amongst the plan partners.*
5. *Promote knowledge transfers across partner programs to help facilitate referrals.*

Low-income and other disadvantaged populations represent a tremendous untapped resource in terms of workforce talent, and strategies will be coordinated through each of the combined

plan programs to connect these populations with gainful employment. Specifically, this will include strategies that target low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who have aged out of the foster care system; English Language Learners; individuals with low levels of literacy; single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; the long-term unemployed and other disadvantaged populations. Several of the strategies to be implemented through the state plan will dovetail and expand support for these populations in order to cultivate the skilled workforce sought by employers and to serve employment needs of Nebraska's disadvantaged workers.

Enhanced access will occur through the reallocation of resources based upon data analysis and/or the increased efficiencies to be realized as a result of the plan's implementation. Additional resources will also be leveraged, as appropriate, from local, state and federal sources to expand and extend workforce services for low-income and disadvantaged populations. NEworks and the Nebraska Career Connections sites will be updated regularly with current information and resources to eliminate barriers to training, education and employment.

Unemployment wage data will be reviewed regularly by the partners to determine the extent of need within the state and its communities. Ongoing assessment of the individual services will also be conducted regularly to continually assess and refine the delivery of services to low-income and other disadvantaged populations of workers.

(B) Alignment with Activities Outside the Plan

Cognizant of the important workforce contributions provided by private and public entities within the state, Nebraska's plan will be supported by several activities that align and leverage these resources. The most successful sector strategies and career pathways rely on the participation of employers, community-based agencies and other agencies in an effort to pool resources for a common workforce purpose.

Community colleges will continue to serve as an essential partner in the workforce system providing education and training, aligning to industry standards, reaching underrepresented populations and forging bridges that extend from K-12 education to employment. Economic development strategies are often initiated at the local level. The state will seek to support efforts locally through the provision of data. Local efforts may also include grant initiatives from private local sources or federal grant-making programs. As appropriate, the programs will seek to coordinate, support, and participate in initiatives that strategically promote workforce development in the state.

(C) Coordination, Alignment and Provision of Services to Individuals

Nebraska's workforce system features a variety of supports and services to help individuals enter and succeed in the workforce. These services extend from school-based education to targeted interventions that meet the needs of specific populations of workers. Coordination and alignment of these services have been an ongoing focus of the partner programs' work in recent years and will be further strengthened through the enclosed combined plan.

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The development of a common intake system will provide a tremendous boost to the programs' efforts in serving their clients. As is the case with many programs, available resources are limited and efforts that reduce duplication can help to maximize outreach and ultimately participant outcomes. The common intake system will not only serve to avoid duplication but it will also help the partners to coordinate services in a timely manner. Sector strategies and career pathways, by design, are geared to serve both potential workers and employers. Workers will benefit from gainful employment opportunities, with special emphasis on high potential jobs.

Services are also coordinated through several local agencies including American Job Centers, local VR offices and eligible training providers. These entities help to assess and deliver services. Sharing of data will be a major focus of the plan to better coordinate these services, allocate resources, devise strategies and support data-driven decision making at all stages of the workforce system.

In addition to these, Nebraska's NEworks' management information system and its Career Connections sites offer an array of information for individuals, including students, youth, adults, veterans, senior citizens, and others. These sites feature job postings, information on training and education options, career exploration, labor market and wage information, information on supportive services, and other information as well to help inform individuals about careers and facilitate their transition to the workplace.

(D) Coordination, Alignment and Provision of Services to Employers

Both the NEworks and Nebraska Career Connections sites contain resources specific to employers to further integrate them into a coordinated workforce system. NEworks provides employers with the ability to find potential job candidates according to skills, experience and qualifications. It also allows for the posting of job openings and also provides a menu of business incentives available to businesses within the state. The NEworks site also contains job market trend data, education and training programs, human resources information, equal employment opportunity information and a host of other resources. The Nebraska Career Connections site allows employers to build an online business profile; offer extended learning opportunities such as internships, job shadows, and facility tours; post job openings; align with career clusters, pathways, and occupations available in your company, and send messages about the company and affiliated opportunities to registered students and adults.

Employers will also serve as integral partners in the development of sector strategies, and in helping ease the transition to employment for workers. This may include working with Nebraska Vocational Rehabilitation and the Nebraska Commission for the Blind and Visually Impaired to provide specialized services and supports for qualified employees.

(E) Partner Engagement and Educational Institutions

Nebraska is served by six community colleges serving the central, mid-plains, northeast, southeast, western and metropolitan regions of the state. These institutions are tremendous partners in the workforce development efforts occurring within their respective regions. They provide high-quality and affordable education and training programs; articulate programming

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with 4-year colleges; maintain strong relationships with local business to align curriculum to industry standards; coordinate bridge and other programs to increase access; design educational experiences for students; leverage resources; and place students in gainful employment.

Community colleges will continue to be a strong workforce partner throughout the execution of this plan. In addition to those contributions previously cited, the community colleges will be a primary provider of education and training for the sector strategies. Also, as Nebraska's current data integration and enhancement efforts produce more useful data, Nebraska will work with its community colleges to share data that informs the development of new courses, curricular modifications and recruitment efforts.

(F) Partner Engagement with Other Education and Training Providers

Plan partners will initiate a variety of strategies to engage other education providers and eligible training providers within its plan for Nebraska's workforce system. This will specifically include working closely with these entities in implementing career pathways, particularly in H3 and other high-demand industries, and to support the implementation of sector strategies.

(G) Leveraging Resources to Increase Educational Access

A variety of resources are presently available to increase educational access within Nebraska. This includes the services provided through the American Job Centers, Nebraska's P-16 educational system, and through public and private agencies within the state. Several strategies will be implemented to improve coordination between the entities, provide support for their access-focused efforts, and promote education among low-income individuals and other populations who would most benefit from additional educational opportunities. This includes funding and case management provided through the American Job Centers and local VR offices. Pell grants are also available to support students who are low-income. Further, access to education (and targeted programs of study) may be a central component of a sector strategy and work will occur on the local level to identify, promote and distribute resources.

(H) Improving Access to Postsecondary Credentials

Each partnering agency will work closely with their specific clients to determine any educational requirements and to incorporate these into case management. With a special emphasis on H3 jobs (high-wage, high-skill, high-demand), Nebraska understands that improving access to postsecondary credentials is critical to both potential workers seeking long-term employment and to employers seeking trained workers. To this end, the partners will work with their respected partners throughout the state to promote the Career Readiness Standards, offer and promote education and training programs, and, as previously described, coordinate the provision of appropriate services within and across agencies to mitigate any barriers to education and training.

(I) Coordinating with Economic Development Strategies

The programs will work closely with the Nebraska Department of Economic Development, local chambers of commerce, and other economic development agencies to coordinate services and support economic development efforts. This will include the provision of unemployment wage

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data, student and skills data and other data sets to determine the availability of skilled workers, which is essential data in recruiting potential businesses and developing local economic development strategies. The effort to coordinate with economic development strategies will continue to entail education and training, using Nebraska's career pathways model. Additionally, as sector strategies are developed at the local area, coordination of these strategies with local economic development will be sought to foster an economic ecosystem around key industries.

(b) State Operating Systems and Policies

(1) State Operating Systems will Support Implementation of Strategies

(A) Operating Systems that Support Coordinated Implementation

The following sections outlines Nebraska current operating systems which will be available to support Nebraska's combined plan for workforce development. As shown, Nebraska has a solid infrastructure that is adequate to support the various reforms described herein and foster the strengthened coordination to occur between the partner programs. Additional systems and system modifications will occur as needed to address challenges and further the work of the partners.

- **NEworks State Data System** In 2010, Nebraska modernized its technology from four separate legacy systems that previously managed information and reported data to a single integrated system that supports Wagner-Peyser, Workforce Innovation and Opportunity Act, Trade Assistance Act, Jobs for Veterans Act, and Labor Market Information. NEworks' web-based technology is an integrated system that provides: direct services virtually to job seekers and employers; electronic case management for workforce staff; federal, state, and local reports; staff and community resources; social media capabilities to communicate with job seekers, program participants, and professionals, and the posting of Labor Market Workforce Information for the public. NEworks is used by all program and administrative staff, and it also provides a common registration for all program applicants, electronic case management of participants, communication capabilities with the job seeker and employer customers, and direct access to Labor Market Information. NEworks includes a self-service web-based labor exchange system available to job seekers and employers alike. NEworks is available 24 hours a day, seven days a week and allows for access and use without having the need to interface with Career Center staff. The utilization of NEworks by all partners included in this plan supports the Governor's vision to utilize technology to deliver services as well as to communicate, collaborate, and streamline services across program lines.
- **QE2** is a web-based case management and fiscal reporting system. The application was written in Ruby on Rails, an open source object oriented web framework, with a MySQL backend. End-user authentication utilizes the Nebraska Directory Services (NDS) framework. Development, hosting, and support is provided by Nebraska VR application developers and network administrators.
- **eForce** allows fully accessible client data tracking, entering and reporting.
- **The National Reporting System (NRS)** is an updated accountability system for the federally funded, State-administered adult education program. The Workforce Investment Act of 1998 (WIA) required a computerized student data system. The purpose

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of the NRS is to have an accountability system for adult education programs by identifying measures for national reporting and their definitions, establishing methodologies for data collection, developing standards for reporting to the U.S. Department of Education, and developing training materials and activities on NRS requirements and procedures. Nebraska's Adult Education data system, the Adult Information Management System (AIMS), is utilized to report required information and data required by the NRS. AIMS was created by the Nebraska Department of Education and is routinely updated to comply with the United States Department of Education guidance and reporting. In addition, enhancements are made to assist local programs in utilizing the data for local program evaluation, improvement, and management.

USES OF NRS DATA

Federal Level:

- To meet agency accountability requirements (GPRA)
- To demonstrate program effectiveness to Congress

State Level:

- To meet state and federal reporting requirements for funding
- As one factor in determining local funding
- To understand local programs and identify technical assistance (TA) needs

Local Level:

- For program improvement efforts
- For program management – to understand students and classes

- **Labor Market Information System** Nebraska's Labor Market Information System is integrated into the NEworks site and includes a robust menu for gathering and analyzing labor market and economic information. The site hosts a variety of tools for job seekers, employers, economic development professionals, and the general public. While the web is used to deliver the majority of data and Labor Market Information (LMI) staff also provide on-site workshops, training, conferences and presentations across the state on LMI. Nebraska's Core Products and Services Workforce Information Grant staff assist State and Local Workforce Development Board members in reviewing projections to ensure understanding of the data. This training provides information on trends, needs and issues on a local, regional and statewide basis. In addition, there is a regional analyst position that meets statewide with One-stop management and staffs about their LMI needs, and hosts training on how to use LMI in their local areas. This analyst meets with local Chambers of Commerce, economic development committees, and businesses to determine the needs of local businesses, and assist them in understanding the availability and use of labor market information.
- **H3 (High-Wage, High-Skill, High-Demand) site** utilizes "real time" job posting and job seeker information from NEworks as well as statistical projections to educate end users on labor market trends. This website was built to be "use friendly" for educators, workforce professionals, economic developers, parents, students, job seekers, and other interested parties. H3 data is useful to economic developers and community leaders who wish to fill in-demand occupations as well as educators, students and their parents, and job seekers who are planning career paths. The Nebraska Departments of Labor, Economic Development, and Education collaborated to provide information on

Nebraska's high-wage, high-skill and high-demand occupations. The H3 site was the result of a collaborative effort between the prior WIA 5-Year State Plan, 60 NDOL employment and training programs, Career Technical Education and the Department of Economic Development.

- **Eligible Training Provider List** Nebraska will provide a comprehensive listing of training providers, training programs, and demographic information. Through our NEworks technology, users can access information on education and training providers by city, course of study or by occupational title. Providers also use TrainingLink to submit their Eligible Training Provider applications. Customers are able to access the statewide list of eligible training providers and their performance information. The eligible training provider list will contain at least the following information:
    - a description of each program, including the resulting postsecondary credential(s);
    - program performance information, including rates of unsubsidized employment during the second (2nd) and fourth (4th) quarters after program exit, median quarterly earnings during the second (2nd) quarter after program exit, and credentials attainment;
    - a description of provider partnerships with businesses relating to the program;
    - other information NDOL may require in order to demonstrate high quality training services;
    - how the program aligns with in-demand industry sectors and occupations; and
    - program-specific performance and cost information, including tuition and fees.
- **Electronic Case File System** Nebraska implements electronic case files for all partner programs included in this Plan. This is our continual effort to promote efficiency, achieve quality case files, increase consistent file documentation, and achieve complete program verification and accuracy in federal reporting. The core partners transitioned to electronic case files to document all new program enrollments. NEworks uses an electronic document imaging and storage system called Enterprise Content Management (ECM). To capitalize on the increased efficiency of data storage and retrieval, NDOL revised the documentation process for determining eligibility and the maintenance of pertinent records. For new enrollments, NDOL is no longer dependent on hard copy documentation and uses electronic verification of eligibility requirements. The ECM system includes both internal and external access allowing all servicing partners the means to efficiently provide services for their clients. The NEworks electronic application is now the application of record. The goal of the ECM project is to: reduce staff time accessing hard copy documentation; increase the consistency of file documentation; provide easily accessible single point access for file review; and ensure complete verification for program eligibility. Other benefits include: one source of data for case management; easing storage requirements; federal reporting accuracy; timeliness of input; comprehensive view of participant's record; and data validation. The electronic information referenced will be made available to any USDOL or state auditor, or monitor who needs access in order to carry out their official duties.

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(B) Data Collection and Reporting Processes

Nebraska through its combined plan partners will utilize various methods (that are appropriate given the nature, scope and potential utility of the data being collected) to manage the information being generated through Nebraska's workforce system. Primary amongst these approaches will be the integration of data systems for the enhanced facilitation of data sharing amongst the plan partners. The enhanced system interoperability to occur will support the timely analysis necessary to understand the extent of need for workforce development within the state, the impact of the various services being provided, and ongoing program modifications as part of a streamlined and efficient workforce delivery system. In developing and refining data sharing procedures and systems, policies and precautions will be initiated to ensure the integrity of the data as well as the confidentiality of participants.

(1) State Policies will Support the Implementation of Strategies

The State of Nebraska has established policies and procedures to govern the various aspects of workforce development within the state. A brief description for each of these policies is included as follows with the complete policy accessible at www.dol.nebraska.gov under the Workforce Innovation and Opportunity Act section. Additional policies, necessary to support enhanced coordination, will be developed as needed.

- **Accessibility** – ensures equal access to the programs, services and facilities of each American Job Center system location regardless of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status, and against certain non-citizens.
- **Allocation Planning** – establishes the formulas for allocation of WIOA funding to local area and describes the methods by which the NDOL will distribute funds to each local area, recapture funds when necessary, and utilize funding to support administrative and statewide funding to support WIOA-related activities.
- **Administrative Cost Limitations** – provides guidance regarding how administrative funding can be utilized for local workforce area expenditures. Allowable activities and caps associated with the use of administrative funds are outlined.
- **Audits and Audit Resolution** - provides guidance related to audit requirements under WIOA, the Uniform Guidance (2 CFR Part 200), and previous OMB circulars. Provides clarifying definitions so that each local area, grant recipient, subrecipient, one-stop provider, or service provider understand their required roles within the auditing process.
- **Career Planning** – provides information and expected standards to Career Planners relating to the services and resources available for WIOA participants. Guidance is included relating to referrals, assessments, registration, enrollment, eligibility, participation, individual service strategy, supportive services, training decisions, exits, follow-up, and documentation.
- **Cash Management** - ensures local areas properly utilize cash on hand, cash advances, reimbursement methods, working capital, cash depositories, interest, and payments.
- **Co-Enrollment -** provides guidance for coordinating activities between multiple programs and encourages the use of seeking opportunities for co-enrollment that benefit program participants.

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- **Conflict of Interest –** outlines 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 identifies procedures to resolve such conflicts.
- **Correction of Record –** outlines timelines, processes, and requirements for corrections of record requests. Information relating to the appropriateness of record corrections is addressed.
- **Criteria for Local Workforce Development Boards** – establishes membership, composition, and other criteria for the operation of the local workforce development boards.
- **Demand Occupations** – provides the definition of "demand occupations" and its impact on services provided at the local level; clarifies the expectations for funding WIOA Adult and Dislocated Worker training in Nebraska regarding high-wage, high-skill, high-demand occupations, and occupations at either the state or regional level.
- **Data Validation** – helps ensure to the maximum extent feasible the accuracy of the data entered into the required management information systems. Emphasizes the importance of complete information for program monitoring and improving program results.
- **Designation as a Local Area** – provides guidance and requirements relating to the local area designations under WIOA. Provides a mechanism for local areas to make a formal request for initial designation under WIOA.
- **Designation of Regions** – provides background information relating to the process, activities, and research that have been conducted in an effort to identify WIOA required regions and planning regions in Nebraska.
- **Electronic Case Files** - establishes requirements regarding electronic file storage and documentation imaging standards in the administration of WIOA, Wagner-Peyser, Trade Adjustment Assistance and related assistance programs, National Dislocated Worker Grants, and Work Opportunity Tax Credit under the State's integrated Management Information System, NEworks and Enterprise Content Management system.
- **Eligibility for Adult Programs** – presents eligibility criteria for the adult programs as defined under the provisions of the WIOA.
- **Eligibility for Dislocated Worker Programs** – presents eligibility criteria for the dislocated worker programs as defined under the provisions of the WIOA.
- **Eligibility for Youth Programs** – presents eligibility criteria for the adult programs as defined under the provisions of the WIOA.
- **Eligible Training Provider** – prescribes eligibility criteria and general conditions that training providers must meet in order to become certified as an eligible provider to receive adult and dislocated worker funds through Individual Training Accounts under WIOA.
- **Equal Opportunity and Nondiscrimination** - ensures nondiscrimination and equal opportunity, as well as nonparticipation in sectarian activities. Prohibits discrimination on the basis of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status, against certain noncitizens, sex-based

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stereotypes (including stereotypes about how persons of a particular sex are expected to look, speak, or act).

- **Family Educational Rights and Privacy Act (FERPA)** – provides guidance relating to compliance with FERPA, which protects the privacy of student education records, yet allows schools to disclose those records, with consent, to the specific parties under certain conditions.
- **Grievances or Complaints of a Nondiscriminatory Manner** – establishes procedures for properly handling grievances or complaints alleging violations of the requirements of Title I. Requires local areas to establish their own written procedures for complaints, such procedure shall include an opportunity for a hearing and be completed within 60 days after the filing of the grievance or complaint.
- **Hatch Act** – provides guidance relating to specific political activity restrictions on some individuals paid with federal funds.
- **Incumbent Worker Training Program** – ensures local areas establish policies relating to potential incumbent worker training programs authorized under WIOA. Outlines the requirements to establish such programs, the spending caps in place, and provides a sliding scale for employers (based on number of employees) to determine the required employer cost share of such programs.
- **In-Demand Industries and Occupations** – provides guidance to local areas relating to WIOA provisions addressing the term "in-demand," and defines "in-demand" as it relates to industries and occupations.
- **Individual Training Accounts** - concerns ITAs established on behalf of participants to be used for the payment of training expenses to eligible training providers using funds from WIOA.
- **Local Area Plan Modifications and Revisions** – relates to modified local plans which will serve as a "transitional" plan during the first two program year of WIOA implementation
- **Monitoring** – establishes the state's process for monitoring program and fiscal performance at the state and local area levels on a yearly basis to ensure proper systems are in place, being followed, and meet the requirements of the law.
- **Memorandum of Understanding** – this policy is in development and has not yet been released under WIOA. It will provide instructions to the local workforce development boards for developing and entering into a memorandum of understanding with all American Job Centers partners in the operation of the one-stop delivery system in the local area.
- **On-The-Job Training** – establishes minimal requirements for on-the-job training contracts to ensure participants are provided a structured training opportunity in which to gain the knowledge and competencies necessary to be successful in the occupation in which they receive training, and that training services are provided in a manner that maximizes consumer choice in the selection of an eligible provider of such services.
- **Out-of-School Youth Spending** – addresses the WIOA requirement of at least 75% of youth funds (except for local area expenditures for administrative purposes) must be used to provide activities to out-of-school youth.

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- **Pell Grants and Other Financial Aid** – enhances collaboration between the workforce development system and financial aid offices will ultimately benefit eligible individuals and their dependents through increased financial aid and improved access to education and training opportunities. Provides guidance relating to the coordination of WIOA funding with Pell Grant and other available resources.
- **Procurement Standards** – provides guidance relating to general procurement administration, changes to service provider contracts under WIOA, developing contracts or agreements, conflict of interest, competition, confidentiality and non-disclosure, copyrights, construction, awarding review, bonding, monitoring of local procurement practices, pay-for-performance contracts, designation and certification of one-stop operators, and youth program competitive selection requirements.
- **Property Management** – provides guidance regarding the use, management, and disposal of equipment acquired under a federal grant in accordance with State and Federal laws and procedures.
- **Rapid Response –** establishes strategies and activities necessary to (i) plan for and quickly respond to announcements of business closures and layoffs and mass job dislocation resulting from natural or other disasters; (ii) deliver services that enable dislocated workers to transition to new employment as quickly as possible; and (iii) address the needs of businesses in transition to prevent or minimize the duration of unemployment.
- **Record Retention –** establishes protocols to keep and maintain records that are sufficient to prepare required reports, meet program record-keeping requirements, and to have the ability to trace funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully.
- **Request for Local Board Certification –** establishes standards for local boards to submit a request to the Governor to certify one local board for each local area in the state, once every two years.
- **Roles and Responsibilities of Chief Elected Officials –** provides guidance relating to the roles of CEOs within each local area. Identifies the requirement of a CEO agreement, and identifies duties relating to board appointments, grant recipient duties and liabilities, submission of the local plan, coordination of designating and certifying one-stop operators, Memoranda of Understanding, oversight of the one-stop delivery system, and budgeting.
- **Salary and Bonus Limitations –** outlines federal salary and bonus limitations applicable to WIOA funding.
- **Supportive Services -** provides supportive service program guidelines to local areas for WIOA eligible participants.
- **Trade Adjustment Assistance Program under Trade Act of 2002** – provides guidance and establishes criteria for administering benefits and services under the act.
- **Trade Adjustment Assistance Program Under Trade Act of 2011** -- provides guidance and establishes criteria for administering benefits and services under the act.
- **Trade Adjustment Assistance under the Trade and Globalization Adjustment Assistance Act of 2009** – provides guidance and establishes criteria for administering benefits and services under the act.

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- **Work Experiences for Youth, Adults, and Dislocated Workers -** explains the requirements of the Youth, Adult and Dislocated Worker programs to provide work experiences for eligible individuals under WIOA. This policy highlights the 20% work experience spending requirement for Youth under WIOA. Additionally, it provides information about the qualification of providers and describes some of the restrictions on work experiences.
- **Youth Program Design** – defines criteria for the design, elements, and parameters of youth programs.

In developing guidelines for state-administered one-stop partner programs' contributions to a one-stop delivery system, Nebraska will work closely with the American Job Centers within the state to review their contributions to a one-stop delivery system. This will include the establishment of appropriate benchmarks and guidance to guide local efforts around the equitable distribution of funds. A copy of these guidelines will be furnished within the 2018 modification of the state plan.

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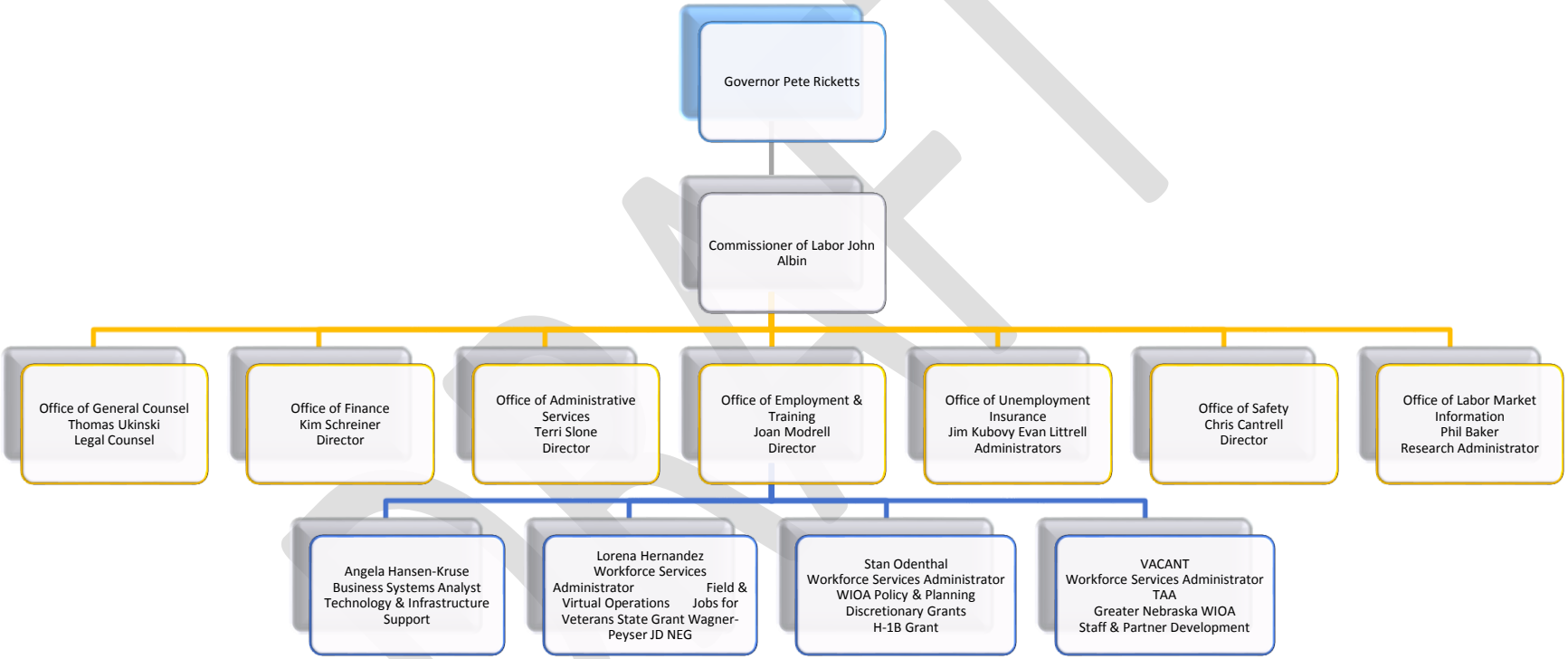
(3) State Program and State Board Overview

(A) State Agency Organization



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- Governor Pete Ricketts
    - Commissioner of Labor John Albin
        - Office of General Counsel, Thomas Ukinski, Legal Counsel
        - Office of Finance, Kim Schreiner, Director
        - Office of Administrative Services, Terri Slone, Director
        - Office of Employment & Training, Joan Modrell, Director
            - Angela Hansen-Kruse, Business Systems Analyst, Technology & Infrastructure Support
            - Lorena Hernandez, Workforce Services Administrator, Field & Virtual Operations, Jobs for Veterans State Grant, Wagner-Peyser, JD NEG
            - Stan Odenthal, Workforce Services Administrator, WIOA Policy & Planning, Discretionary Grants, H-1B Grant
            - VACANT, Workforce Services Administrator, TAA, Greater Nebraska WIOA, Staff & Partner Development
        - Office of Unemployment Insurance, Jim Kubovy Evan Littrell, Administrators
        - Office of Safety, Chris Cantrell, Director
        - Office of Labor Market Information, Phil Baker, Research Administrator

(B) State Board

The Nebraska Workforce Development Board (NWDB) is currently comprised of 55 members who reside throughout the state and represent business, labor, community-based organizations, education, higher education, human services, economic development, government and other essential stakeholder groups. A majority of the Nebraska Workforce Development Board members represents business and industry (see enclosed table). The voting membership of the NWDB is composed of 18 business representatives and 16 partner and government representatives. The board rethinks and restructures the way workforce development services are planned and delivered so they meet the needs of both the employer and job seeker customer. The NWDB focuses on strategic planning, policy development and oversight of the local Workforce Investment systems. The NDOL Office of Employment and Training serves as staff support to the NWDB and its committees. The NWDB is well equipped to develop the Governor's vision for a Workforce System. Led by a business majority reflecting the varied business opportunities within the state, the NWDB has immediate access to the information required to make the workforce responsive to the changing needs of business. Board membership has an appropriate distribution of members from metro and non-metro areas of the state. It has the diverse partner expertise necessary to insure the inclusion of all segments of the population. In addition, the board has the policymakers needed to achieve those changes in a timely, meaningful manner.

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Nebraska Workforce Development Board – Business Members

Business – Sec. 101(b)(1)(C)(i)	Company	Location
Tammie Beck	Cabela's	Kearney
Brian Deakin	BD Medical	Holdrege
Michael Geary	Kiewit Corporation	Omaha
James (Jim) Hanson*	InTouch Communications	Omaha
Mark Moravec (Chair)	Chief Industries, Inc.	Grand Island
Don Nordell	Black Hills Energy	Lincoln
Terri Ridder	Franciscan Care Services, Inc.	West Point
Bradley (Brad) Schroeder (Vice-Chair)	Blue Cross Blue Shield of Nebraska	Omaha
Jennifer Sedlacek	Union Pacific Railroad	Omaha
Becky Stitt	Western Sugar Cooperative	Scottsbluff
Carol Swigart*	Hillaero Modification Center	Lincoln
Lisa Wilson*	Case New Holland Industrial	Grand Island

Nebraska Workforce Development Board - Other Required Members

Governor *(Sec. 101(b)(1)(A))*	Organization	Location
Governor Pete Ricketts	State of Nebraska	Lincoln
State Senator *(Sec. 101(b)(1)(B))*	**Organization**	**Location**
Senator Health Mello	Nebraska State Legislature	Lincoln
Representatives of the Workforce within in State *(Sec. 101(b)(1)(C)(ii))*	**Organization**	**Location**
Bradley (Brad) Bird	Steamfitters and Plumbers Local 464	Omaha
Jason Feldhaus	Nebraska Child and Families Foundation	Lincoln
Allan Hale	National Electrical Contractors Assoc.	Omaha
Susan (Sue) Martin	Nebraska State AFL-CIO	Omaha
Michelle Olson	CHP International Inc./Job Corps	Omaha
The Balance – *(Sec. 101(b)(1)(C)(iii))*	**Organization**	**Location**
John Albin	Nebraska Department of Labor	Lincoln
Matthew (Matt) Blomstedt	Nebraska Department of Education	Lincoln
John Fagot	Mayor of Lexington	Lexington
Courtney Phillips	Nebraska Department of Health and Human Services	Lincoln
Vern Powers	Mayor of Hastings	Hastings
Courtney Dentlinger	Nebraska Department of Economic Development	Lincoln

(4) Assessment and Evaluation of Programs and One-Stop Partners

(A) Assessment of Core Programs

Assessment of the core programs will be ongoing throughout the implementation of Nebraska's plan in order to meet the minimum performance reporting requirements as described in WIOA Section 116(B). This will entail the collection of key data in order to assess the performance measures established for each program (e.g., employment rate, median earnings, credential rate, measurable skills gains, placement rates, etc.). As described, Nebraska maintains several powerful data reporting systems to assist in the collection and aggregation of these data, specifically NEworks and Nebraska State Longitudinal Data Tracking system.

The aforementioned data will be used to develop annual reports, determine the percent of the negotiated plan achieved, and to compare Nebraska's performance against other states. Assessment will include the goals established by local and regional areas in order to coordinate efforts and outcomes. In keeping also with the reporting requirements, Nebraska the data will be available both in summary and aggregate form to allow for reporting based on the demographic characteristics, population barriers and services provided.

(B) Assessment of One-Stop Partners

Assessment of the one-stop partners has not been conducted previous to the development of this plan. However, Nebraska, under the authority of its Workforce Development Board, will work with its American Job Center partners throughout the state to implement the collection of WIOA performance measures data and to securely transfer the data to the state. Additional metrics may also be identified and incorporated into the one-stop assessment process in order to evaluate workforce development at the local area.

(C) Previous Assessment Results

Assessment of the effectiveness of the core programs, combined plan partners and other one-stop partner programs have not been previously conducted. Performance measure for the core partners will be established (as described in Section 116 of the WIOA) working with the Secretary of Labor in conjunction with the Secretary of Education. This combined plan outlines specific strategies that will be used to assess the effectiveness of these programs and provide the data necessary to track progress toward the negotiated performance goals. The results of these assessments will be provided beginning with the 2018 state plan modification.

(D) Process for Conducting Evaluations and Research Projects Under WIOA Core Programs; conjunction with state and local boards as well as state agencies; and in coordination with evaluations provided by the Secretary of Labor and the Secretary of Education Under WIOA.

Assessments will be aligned with WIOA program performance measures and any agency- or program-specific measures developed for the programs. These assessments will seek to determine the efficacy of the interventions being implemented, with priority given to their impact on populations facing barriers to employment. This may include but is not limited to low-income individuals; individuals with disabilities; ex-offenders; homeless individuals; youth who

have aged out of the foster care system; English Language Learners; individuals with low levels of literacy; single parents; farmworkers; those within two years of exhausting lifetime TANF eligibility; and the long-term unemployed. Assessment will be coordinated with efforts taking place at the local and regional levels in order to support data collection, data analysis and to foster assessment that furnishes accurate indicators of workforce development within the state. Coordination will also occur to align state evaluations with those provided by the Secretary of Labor or Secretary of Education under WIOA.

(5) Distribution of Funds for Core Programs

(A) Title I Programs: Description of Written Policies for Distribution of Funds for (i) Youth Activities; (ii) Adult and Training Activities; and (iii) Dislocated Worker Employment and Training Activities

Distribution Timing. Funds for Youth activities for the entire program year are available on or after April 1. For the period between April 1, 2015, and June 30, 2015, WIOA funds are to be used only to serve WIOA youth participants, while Workforce Investment Act (WIA) funds may be used during this period to serve youth participants eligible under WIA. On July 1, 2015, all WIA youth participants who are still enrolled in the WIA Youth program must be considered eligible for the WIOA Youth program, even if the participant would not otherwise be eligible for WIOA.

The Adult and Dislocated Worker funds are allotted on both a Program Year (PY) and Fiscal Year (FY) basis.

- Base Funds (PY): The first allotment becomes available for obligation on July 1; this portion is commonly referred to as "base" funds.
- Advance Funds (FY): The second allotment becomes available for obligation on October 1; this portion is commonly referred to as "advance" funds.

Availability of Funds. For the state, funds are available for expenditure during the program year of allotment and the two succeeding program years. For local areas, funds are available for the program year of allocation plus one succeeding program year.

Methods and Factors of Distribution

Adult and Youth Funds

Nebraska will use the standard allocation formulas (below) for distributing the Adult and Youth funds portion to the local areas. The 30 percent discretionary method will not be a part of the process.

In allocating the Adult and Youth funds to local areas, a state may allocate:

- $33^{1}/_{3}$% of the funds on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each designated area, compared to the total number of unemployed individuals in all such areas of substantial unemployment in the state;

- $33^{1}/_{3}$% of the funds on the basis of the relative excess number (note definition above) of unemployed individuals in each designated area, compared to the total excess number of unemployed individuals in all designated areas; and
- $33^{1}/_{3}$% of the funds on the basis of the relative number of disadvantaged (Youth or Adults), compared to the total number of disadvantaged (Youth or Adults) in the state.

Dislocated Worker Funds. Pursuant to 133(b)(2)(B) of WIOA, the following formula for Dislocated Worker Funds will be instituted beginning with the allocations under Program Year 2015 (July 1, 2015 to June 30, 2016).

Allocated Factor	Current Weight
UI	15%
Excess UI	15%
Long Term	20%
Dislocated Workers	20%
Declining Industries	5%
Farmer/Rancher Hardship	5%
Enrollments in DW programs	20%
	100%

(B) Title II Programs: (i) How the Agency Will Award Multi-Year Grants; (ii) Ensuring Direct and Equitable Access to All Eligible Providers to Apply and Compete for Funding

The Nebraska Department of Education, under the Adult Education and Family Literacy Act (Title II) of the Workforce Investment and Opportunity Act, Section 231, will:

(i) award multi-year grants, on a competitive basis, to eligible providers; and

(ii) ensures that all eligible providers have direct and equitable access to apply for grants by using the same grant announcement and application processes for all eligible providers in the state.

(C) Title IV Programs: Factors Used by the State to Determine the Distribution of Funds

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

(6) Program Data

(A) Data Alignment and Integration including (i) Interoperability of Management Information Systems; (ii) Integration of Data Systems; (iii) Alignment of Technology and Data Systems and (iv) Generation of Required Reports

Enhanced coordination between the partner programs is one of the primary goals of Nebraska's combined state plan, and the attainment of this goal will strongly hinge on the ability of these programs to share a wide swath of workforce-related data in real time. As is the case in many states, the exchange of data in real time is a daunting challenge for workforce development

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programs given their unique data systems, common intake procedures, security concerns, and privacy laws.

As documented in the goals section of this plan, each of the plan partners is strongly committed to developing the technical reforms (i.e., procedures, policies, systems and safeguards) necessary to meet WIOA data alignment requirements and to support coordinated and streamlined service delivery, ongoing assessment of services, and continuous improvement.

A data integration task force will be established to further explore the feasibility of aligning the data systems from technical, programmatic and legal perspectives. The task force will include representatives from each of the plan partners including those with the requisite technical expertise necessary to understand the architectural potential and adaptability of the agencies' present data systems.

A main focus of this entity initially will include the interoperability of the stakeholders' technology and data systems. This will not only involve the system modifications necessary to support the secure exchange of data but also working with partnering programs to ensure any alignment supports the State's overall goal of strengthened coordination amongst the programs.

Primary amongst the system's desired features is the ability to generate the data required for reports in meeting WIOA Section 1116(b) and to support continuous monitoring of the programs. This will include the ability to produce data on each of the WIOA performance measures and to aggregate this data according to client characteristics, services rendered and other identifiers.

In 2015, Nebraska was awarded its second Workforce Data Quality Initiative Grant through US Department of Labor. The grant seeks to establish a warehouse of workforce data to include NDOL employment and training records, all community college, all state college and one university campus, Adult Basic Education, Carl Perkins and Vocational Rehabilitation records to begin building the database. The data warehouse initiative is designed to produce the information NDOL and its partners need to monitor performance and initiate any programmatic improvements based on the data. To extend the potential impact of this initiative, additional training providers, Registered Apprenticeship and Temporary Assistance to Needy Families (TANF) will also be invited to participate in the data warehouse initiative.

(B) Assessment of Participants' Post-Program Success in Postsecondary Education and/or Employment

As detailed in the "Performance Goals Matrix" (see Appendix), specific benchmarks will be established by each of the programs (negotiated with the Secretary of Labor in conjunction with the Secretary of Education) to track participants' post-exit outcomes using such indicators as employment, median earnings, credential attainment, measurable skills gains, and other workforce indicators assessed at various intervals post-program exit. In addition to these data, Nebraska will also utilize Nebraska's State Longitudinal Data System (SLDS) and its data warehouse (being developed through its Workforce Data Quality Grant Initiative) to collect

relevant data and use the data to determine post-program education and employment outcomes for participants.

Nebraska's SLDS provides the data necessary to improve the quality of Nebraska's workforce. Data elements from each programs' management information system for federal reporting is included in the NELDS. These include WIOA Title I, Wagner-Peyser, TAA, TRA, UI benefit claims and demographic data, UI Tax data, FEDES data, WRIS and WRIS2 data, CTE postsecondary, Adult Basic Education, Department of Motor Vehicles (DMV), data for WIOA eligible training provider consumer reports, Vocational Rehabilitation, Registered Apprenticeship and TANF. The NELDS will allow for maintenance of the data over time while keeping within FERPA and WRIS, WRIS2 guidelines and Employment Security laws.

Nebraska's Longitudinal Data System links directly to the Nebraska Department of Education's Student and Staff Record System using the participant's social security number or unique student identification number. This unique identifier provides for the collection of a variety of data such as test scores, teachers, graduation rates and transcripts – all cross-referenced to postsecondary and workforce outcomes. From the specific matching wage records to the programs listed above, program managers and policy makers can determine: whether individuals are employed, what their earnings and industry employment are if they are employed, whether they have been or become unemployed, whether they collect unemployment insurance benefits, what workforce and training services they may have received and what the workforce outcomes are upon completing training services. The data provided here will help assess the effectiveness of Nebraska education and workforce system and also help identify factors that bring people to need these services.

(C) Use of Unemployment Insurance Wage Record Data

NEworks, Nebraska's Management Information System, meets WIOA Title I regulatory and reporting requirements for tracking participants and possesses the functionality to integrate both state and Wage Record Interchange System (WRIS) unemployment insurance data into participant records to allow for federal reporting from a statewide and regional perspective. The partner programs will use the Unemployment Insurance Wage Records generated by NEworks for assessing workforce performance measures as part of an overall strategy to workforce outcomes and refine processes throughout Nebraska's workforce delivery system.

It is also noteworthy that Nebraska is currently one of 39 states, the District of Columbia, and the Commonwealth of Puerto Rico participating in the Wage Record Interchange System 2 (WRIS2). WRIS 2 is designed to extend the WRIS data sharing model to required American Job Center partner programs that do not fall under the jurisdiction of the Department of Labor, and it also extends the data sharing model to programs defined by the Act as "additional" partners (i.e., those entities who are not mandatory partners in the American Job Center delivery system but are appropriate given the services provided through their agencies. WRIS 2 is specifically designed to help facilitate the generation of Aggregate Statistical Reports and subsequent analysis in satisfaction of Federal and state reporting and performance requirements. WRIS 2

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ensures the availability of data for research and evaluation of workforce programs without compromising personal identifiable information.

(D) Privacy Safeguards

In implementing its combined state plan for workforce development, the State of Nebraska is committed to ensuring the privacy of all its workforce participants. To this end, each of the combined plan partners will adhere to applicable federal, state and local laws including Family Education Right and Privacy Act (FERPA), the Health Insurance Portability and Accountability Act (HIPAA) and others. Given the enhanced data sharing to occur, each of the programs will work with its legal counsel to review any interagency agreement that involves the sharing of data, in order to ensure that privacy safeguards are clearly established and understood by each of the programs.

(7) Priority of Service for Veterans

Federal law and regulations require all workforce programs funded by the Department of Labor to provide priority of service to:

1. Veterans who served in the active military, naval, or air service and were discharged under conditions other than dishonorable; and,
2. Eligible spouses of those veterans who have total service-connected disabilities or who died as a result of service-connected disabilities.

Priority of service means that those Veterans and eligible spouses who meet all the eligibility requirements for a program or service are to receive access to that program or service either earlier in time or instead of persons who are not eligible for priority of service.

Veterans are provided priority of service at all Nebraska Career Centers. All veteran job seekers are registered and provided staff assisted services through the Career Center delivery system. Priority of services to veterans is further supported through the use of NEworks, the State Management Information System. NEworks automatically matches qualified applicants to available jobs through job registration and the creation of an online resume. When a job search is run against any job opening, a list of qualified job seekers is created. All eligible veterans are placed at the top of the list.

Career Center staff members then have three available options to notify eligible veterans of available job openings:

- call the veteran individually
- email the veteran
- notify him/her through the "My Workspace" Message Board within NEworks, if the individual is registered on NEworks

All veterans are strongly encouraged to register in NEworks so they can be provided staff-assisted services. This, combined with the NEworks self-service labor exchange system, ensures veterans priority of services in the Wagner-Peyser public labor exchange system. The "Nebraska Disabled

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Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representative (LVER) Grant Modification Plan" provides information on how all of the Career Centers have fully integrated the Veterans program into their local service delivery system. The main focus for LVER is outreach to employers.

Representatives promote the advantages of hiring veterans to employers and employer groups. After veterans are determined to be job-ready following the receipt of intensive services from a DVOP specialist, it is the role of the LVER staff to then focus on individualized job development. This may be facilitated through the use of employer-focused seminars or, in conjunction with employers, may involve veteran-focused job search workshops, Transition Assistance Program (TAP) workshops, and/or the establishment of job search groups. LVERs advocate for employment and training opportunities for veterans with business and industry and community-based organizations.

Responsibilities may include planning and participation in job fairs to promote veterans, working with unions and apprenticeship programs and promoting credentialing and training opportunities for veterans, monitoring job listings from federal contractors, and ensuring veterans receive priority in referrals to these jobs. DVOP specialists provide intensive services including comprehensive assessment of education, skills, and abilities; in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals; group and individual career coaching; short-term, pre-vocational services; and development of an individual employment plan that identifies employment goals, interim objectives, and appropriate services that will enable the veteran to meet his or her employment goals. They conduct outreach activities at a variety of sites. DVOPs also serve as case managers for veterans with serious disadvantages for the job market and for veterans enrolled in federally-funded training programs, such as the Department of Veterans Affairs' Vocational Rehabilitation program.

As the state's primary source of staff-assisted and self-service labor exchange services, all of Nebraska's American Job Centers have fully integrated the Veterans program into their local service delivery system. At least one fully qualified DVOP and/or LVER staff member is located in 10 of the 14 Career Centers, and at least one Employment Service staff member [trained and certified in Veterans programs by the National Veterans Training Institute (NVTI)] is located in the remaining 6 Career Centers. In addition, 5 of the 14 Career Centers have been identified as Regional Career Centers with program oversight responsibilities for the Career Centers within their regional boundaries. All 5 Regional Career Centers have fully qualified DVOP and/or LVER staff available to provide program support to Career Centers in their region without full-time Veterans staff. The guidelines for the integration, provision, priority, training, placement, and coordination of staff-assisted core and intensive services as well as referral to other partner training programs for the veteran population is provided through the State Veterans' Plan and local Career Center Memorandums of Understanding (MOU) and Business Plans.

(8) Accessibility of One-Stop Delivery System for individuals with disabilities

Nebraska maintains an Accessibility policy that stresses physical and programmatic accessibility, including the use of accessible technology to increase individuals with disabilities' access to high

quality workforce services. Title I of WIOA assigns responsibilities at the local, State and Federal levels to ensure the creation and maintenance of an American Job Center (AJC) system that enhances the range and quality of workforce development services that are accessible to individuals seeking assistance. It prohibits discrimination on the basis of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status, and against certain non-citizens. Although gender identity is not an explicitly protected basis under the applicable federal laws, discrimination based upon gender identity, gender expression, and sex stereotyping has been interpreted to be a form of prohibited sex discrimination, including under laws that apply to federally financially assisted employment, training, and education programs and activities.

As set forth in the regulations (29 CFR Part 38) implementing Section 188 of WIOA, there is an obligation to assure fair and equitable access to all services, programs and facilities for members of both sexes, various racial and ethnic groups, individuals in differing age groups, and individuals with disabilities. Any entity that receives financial assistance under Title I of WIOA is a recipient obligated to ensure nondiscrimination and equal opportunity. This includes State and Local Workforce Development Boards, AJC operators, service providers, vendors, and subrecipients, as well as other types of individuals and entities. This policy is directed toward ensuring that the programs, services and facilities of each AJC delivery system are accessible to all, including individuals with disabilities.

To ensure that individuals are not subjected to discrimination on the basis of disability, NDOL conducts regular oversight of programs and services. Local boards must assess, on an annual basis, the physical and programmatic accessibility of all AJCs in the local area, in accordance with Sec. 188 of WIOA, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990.14.

(9) Accessibility of One-Stop Delivery System for individuals with Limited English Proficiency

Nebraska has established a Limited English Proficiency Plan which ensures that individuals with limited English proficiency are able to access programs and services provided by the American Job Centers and One-Stop Partners on an equitable basis. This plan also addresses the entities that receive Federal financial assistance under Title I of WIOA and programs and activities that are part of Nebraska's one-stop delivery system. Key features of this plan that support access for individuals with limited English proficiency include:

- Establishment of an LEP (limited English proficiency) planning committee to provide guidance and leadership around the equitable provision of services to individuals with limited English proficiency;
- Thorough assessment of the language needs of the populations served by attempting to identify LEP individuals. In order to identify language needs, the LEP committee has reviewed available language data from the U.S. Census American Community Survey and from self-identifying information from NEworks registrants.

- Availability of specific resources at each American Job Center or NDOL local office to include bilingual staff, LanguageLine or International Communications translation services, referral to ESL resources and the availability of materials in Spanish.
- Training on serving individuals with LEP needs is conducted by the Office of Employment and Training. The OET's LEP Coordinator, in conjunction with the agency monitor and the Equal Opportunity Officer or designee coordinates, schedules and implements statewide training. LEP training is conducted every two years, with the training materials and topics being coordinated with the EO Officer or designee. Additional training sessions are conducted via LiveMeeting alerting staff to any major changes necessitating alterations to the LEP plan that would directly influence daily activities. Likewise, training materials and tools are shared with staff through meetings and emails as the OET or the LEP committee becomes aware of them.
- The NDOL public website provides information for workers and employers. This includes information about job searching, training, the Workforce Innovation and Opportunity Act, and many additional programs and services. The NDOL site is accessible at http://www.dol.nebraska.gov. The site features the option of selecting language translation services provided via Google Language Tools. The translation through Google utilizes an automated/computerized translation which serves as an approximation for the site's original content. NDOL has provided a Translation Disclaimer Statement indicating potential issues with the automated translation process. Available languages listed on the NDOL site include: Spanish, Chinese, French, German, Italian, Korean, Russian, Polish, Arabic, Portuguese, Japanese, and Norwegian. The NDOL website provides information on how to contact local field staff for additional assistance.

In addition, English-as-a-Second language instruction is available throughout the state to provide populations with low levels of English literacy with the instruction they need to improve fluency. Referral to providers of ESL education and the provision of transportation and other forms of assistance necessary to access these courses will continue to occur through American Job Centers.

IV. COORDINATION WITH COMBINED STATE PLAN PROGRAMS

Nebraska will be developing a Public Sector Partnership to guide the implementation of the Combined State Plan. The Public Sector Partnership will include the participation of each of the plan partners who will meet regularly to oversee the implementation of the combined plan, assess progress, leverage and align resources, collectively foster improvements in the workforce system, and provide public sector leadership. Functioning as a working committee, the Public Sector Partnership will provide the shared governance, day-to-day coordination and leadership needed to guide enhanced workforce development partnerships among public sector programs.

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V. COMMON ASSURANCES

The Unified or Combined State Plan must include assurances that:	
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 rep- resents, and procedures to resolve such conflicts;
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;
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;
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;
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;
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);

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7.	The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
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;
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;
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);
11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
12.	Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

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VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

(a) General Requirements

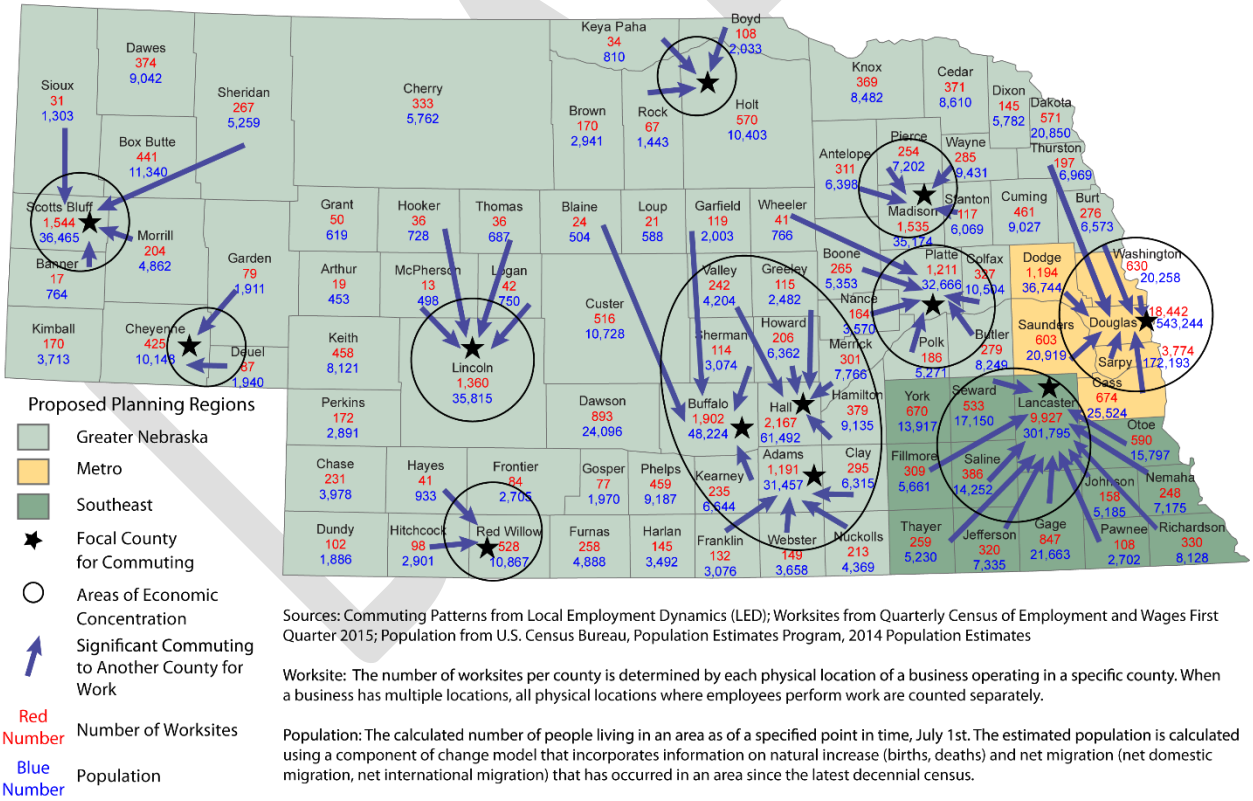
(1) Regions and Local Workforce Development Areas

(A) Identify the regions and the local workforce development areas designated in the state.

The intrastate regional structure described below, which includes three (3) regions, has been recommended and submitted to the Governor but is not yet approved:

1. Metro Region – covers Dodge, Douglas, Cass, Sarpy, Saunders, and Washington Counties, with Douglas County being the target area of economic concentration. Preliminary contact has been made with the state of Iowa to explore the possibility of a future expansion of the Metro Region to include Iowa counties that are economically tied to the Metro Region;
2. Southeast Region – covers Fillmore, Gage, Jefferson, Johnson, Lancaster, Nemaha, Otoe, Pawnee, Richardson, Saline, Seward, Thayer, and York Counties, with Lancaster County being the target area of economic concentration;
3. Greater Nebraska Region – covers the remaining 74 counties in Nebraska

Proposed WIOA Planning Regions with Commuting Patterns, Number of Worksites, and Population by County



Sources: Commuting Patterns from Local Employment Dynamics (LED); Worksites from Quarterly Census of Employment and Wages First Quarter 2015; Population from U.S. Census Bureau, Population Estimates Program, 2014 Population Estimates

Worksite: The number of worksites per county is determined by each physical location of a business operating in a specific county. When a business has multiple locations, all physical locations where employees perform work are counted separately.

Population: The calculated number of people living in an area as of a specified point in time, July 1st. The estimated population is calculated using a component of change model that incorporates information on natural increase (births, deaths) and net migration (net domestic migration, net international migration) that has occurred in an area since the latest decennial census.

The local workforce development areas described below, which includes three (3) local areas, have been recommended and submitted to the Governor but are not yet approved:

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

Nebraska's local area structure has not changed from that under WIA, pursuant to WIOA Section 106(b)(2) and NDOL's Designation of Local Areas policy. The Greater Nebraska Local Area requested the same county make up as designated under WIA.

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

Local area designation process**.** Nebraska's local workforce development area designation process has been performed in accordance with NDOL's Designation of Local Areas policy, which is consistent with WIOA Section 106(b). The policy establishes requirements, criteria, and procedures for local area designation, including initial and subsequent designation.

For any local area designated under subsequent designation, the Governor:

- must review a local area during each four-year state planning cycle to determine whether the local area continues to meet the requirements for subsequent designation prior to the submission of the Combined State Plan for Nebraska's Workforce System;
- may review a local area at any time to determine whether the local area continues to meet the requirements for subsequent designation; and
- may assume the chief elected official and local board to have requested continued designation unless notified otherwise in writing.

Criteria for determination of "Performed Successfully" and "Sustained Fiscal Integrity." Under NDOL's Designation of Local Areas policy, the procedures for determining whether a local area met the criteria for "performed successfully" and "sustained fiscal integrity" are consistent with WIOA Section 106(b)(2) and (3). Criteria for determining successful performance is based on the local area having met or exceeded all performance levels negotiated pursuant to WIA Section 136(c) for the two program years prior to enactment of WIOA. Successful performance is also based on the local area having had no failures of any individual performance measure for two consecutive program years prior to the enactment of WIOA.

The performance standards of "met," "exceeded," and "failure" are consistent with the definition at the time performance levels were negotiated and are based on the following criteria:

- "Met" means the local area met performance levels when the actual performance achieved against an individual performance measure falls within the eighty (80) percent to one hundred (100) percent range of the negotiated level of performance.
- "Exceeded" means the local area exceeded performance levels when the actual performance achieved against an individual performance measure is in excess of one hundred (100) percent of the negotiated level of performance.
- "Failure" means the local area failed to meet performance measures when the actual performance achieved against an individual performance measure is less than eighty (80) percent of the negotiated level of performance.

Criteria for determining sustained fiscal integrity is based on the lack of a formal determination by the United States Secretary of Labor that the local area misexpended funds due to willful disregard of the requirements of WIOA Title I-B (or WIA Title I, as applicable), gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination.

Designation Procedures. The procedure established for any entity seeking designation as a local area, whether an initial designation or otherwise, is as follows:

- the chief elected official and local board complete and submit a "Request for Local Area Designation" form, which is included as an attachment to NDOL's Designation of Local Areas policy;
- the Governor reviews the request to ensure the local area meets the requirements and criteria established under NDOL's Designation of Local Areas policy and under WIOA Section 106(b)(1)(B);
- the Governor forwards the request to Nebraska Workforce Development Board and chief elected officials and local boards in Nebraska for review and comment and makes the request available to the public for comment through Nebraska 's public comment process; and
- upon receipt of a recommendation from Nebraska Workforce Development Board and following consideration of comments from chief elected officials and local boards in Nebraska and the public, the Governor approves or denies the request and notifies Nebraska Workforce Development Board, chief elected officials and local boards in Nebraska, and all other entities seeking designation as a local area.

Regional Designation Process and Regions**.** Nebraska's regional designation process was performed in accordance with NDOL's Designation of Regions policy, which is consistent with the applicable requirements of WIOA Sections 102 and 106 and 20 CFR § 679.210.

At the request of the Governor, NDOL evaluated labor market structure and distribution, designated economic development areas, distribution of educational and training resources, location of population centers, and workforce commuting patterns. The outcome of NDOL's evaluation revealed a substantive relationship between concentrations of economic activity and

statewide workforce commuting patterns. Maps were generated by NDOL's Office of Labor Market Information illustrating this relationship.

Following this evaluation, NDOL consulted with Nebraska Workforce Development Board in October 2015, chief elected officials and local area boards in July and August 2015, and Nebraska's WIOA core partners in July and August 2015 on the designation of regions and provided a summary of its evaluation, for review and comment.

NDOL also held focus groups during the months of July and August 2015, where John Albin, Commissioner, Nebraska Department of Labor and Joan Modrell, Director, Office of Employment and Training, Nebraska Department of Labor met with over 250 workforce system representatives from across Nebraska. The focus groups were held at three Nebraska locations: July 29th in Lincoln, August 13th in Grand Island, and August 20th in Omaha. The purpose of the meetings was to gather ideas and feedback through focus group discussions on the role of WIOA in Nebraska's workforce system. The focus group discussions were co-sponsored by Nebraska 's WIOA core program partners, the Nebraska Department of Labor, Nebraska Department of Education (Vocational Rehabilitation and Adult Education Programs), and Nebraska Commission for the Blind and Visually Impaired. Focus group topics included establishment of regions to promote regional alignment with the labor market and economic development activities and preserve locally driven workforce system through:

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

Subsequent to the consultations and focus groups, the Nebraska Workforce Development Board, chief elected officials, and local boards recommended establishing regions based on the relationship between areas of economic concentration and workforce commuting patterns. In January 2016, based on these recommendations, the Governor designated an intrastate regional structure that includes three (3) regions based on economic concentrations and workforce commuting patterns and three (3) planning regions based on regional economic interdependence and notified all chief elected officials and local boards of the designations.

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

Chief elected officials and local boards or any other entity seeking designation as a local area may appeal a denied request for local area designation. The appeal must be submitted to the Nebraska Department of Labor through the appeal process described below. If a timely decision on the appeal is not rendered or if the appeal does not result in the entity's designation as a local area, the appealing entity may request review by the Secretary of Labor. The Secretary of Labor may require that the appealing entity be designated as a local area if the Secretary determines that the entity was not afforded procedural rights under Nebraska 's appeal process or if the entity meets the initial designation requirements established under WIOA Section 106(b)(2).

Appeals brought pursuant to WIOA Section 106(b)(5) will be conducted in accordance with the Nebraska Administrative Procedures Act (Neb. Rev. § 84-917). Nebraska's Commissioner of Labor may conduct hearings on behalf of the Governor and make findings and recommendations to the Governor on the merits of the appeal. In the case of an appeal by an entity not granted designation as a local area, the Nebraska Workforce Development Board will review the findings and recommendations of the Commissioner and advise the Governor as to whether the appeal should be granted or denied.

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

Appeals relating to determinations for infrastructure funding are accepted from One-Stop partners challenging the partner's portion of funds to be provided for One-Stop infrastructure costs. The appeal process is as follows:

1. Appeals must be made in writing and directed to: Joan Modrell, Director of the Office of Employment and Training, Nebraska Department of Labor, 550 South 16th Street, Lincoln, NE 68508. The appeal should:
    a. reference the portion of funds determined by Nebraska;
    b. include specific issues to be addressed; and
    c. provide a point of contact and mailing address to which a response can be sent.

    In order to be considered a valid appeal, an appeal must be received within ten (10) business days of the date the One-Stop partner receives notice of the determination of the portion of funds.
2. A response will be made in writing to the point of contact named in the appeal by the One-Stop partner, generally within ten (10) business days of receipt of the appeal by Nebraska's Director of the Office of Employment and Training.
3. If the response from the Director of the Office of Employment and Training has not satisfied the appeal of the One-Stop partner, the partner may request a meeting with the Nebraska's Commissioner of Labor. The request must be made in writing and directed to: John Albin, Commissioner of Labor, Nebraska Department of Labor, PO Box 94600, Lincoln, NE 68509-4600. The request should:
    a. reference the portion of funds determined by Nebraska;
    b. include specific issues to be addressed; and
    c. provide a point of contact and mailing address to which a response can be sent.

    To be considered a valid request, it must be received within ten (10) business days of the determination by the Director of the Office of Employment and Training.
4. A meeting will be scheduled with the One-Stop partner, the Director of the Office of Employment and Training, and the Commissioner of Labor to permit the partner to present its issues.
5. A written response of the final decision of the Commissioner of Labor will be sent to the One-Stop partner, generally within ten (10) business days, unless additional time is necessary to fully examine the issues presented.

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6. If desired, a One-Stop partner may opt to skip Steps 1 and 2 and begin with Step 3, appealing simultaneously to the Director of the Office of Employment and Training and the Commissioner of Labor.

(2) Statewide Activities

(A) Provide state policies or guidance for the statewide workforce system for use of state funds for workforce investment activities.

NDOL's policies for the statewide workforce system for the use of state funds for workforce investment activities may be accessed on NDOL's Workforce Innovation and Opportunity Act Policies webpage.

(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.

Governor's Set Aside Funding. The Governor's set aside funding may be used for any allowable activity described in 20 CFR 370 or WIOA Sections 129(b)(2) and 134(a)(3). Priority workforce activities for set aside funding are:

1) Developing the framework for industry sector partnerships at the local or regional level to greatly increase the alignment of high demand, high wage and high skill jobs with the workforce system making the system relevant to the needs of state and local businesses;
2) Implementing a public sector partnership that represents Nebraska's Workforce System by growing the current Nebraska Partnership Council into an entity that serves as a catalyst for aligning terminology, career services, intake processes and technology across plan partners;
3) Maintaining and enhancing the Eligible Training Provider List process and product;
4) Supporting the Requesting and Reporting System (RRS) for financial expenditures and obligations;
5) Developing strategies to assist Nebraska's local and regional areas;
6) Monitoring; and
7) Creating demonstrations and conducting research particularly related to employment and education expectations of employers of adult, youth, and dislocated workers.

Pursuant to WIOA Section 134(a)(2)(A)(ii), up to 25 percent of Nebraska's dislocated worker funds may be reserved for Rapid Response activities. These funds will be used to provide Rapid Response services and/or information to employees being affected by a layoff or closure. Additional information regarding the Rapid Response program can be found in NDOL's Rapid Response policy.

The Rapid Response Unit will work with plan partners and other partner agencies to provide information to dislocated workers regarding reemployment and training opportunities:

- Virtual Service Unit (to provide individual follow up and reemployment services);
- Unemployment Insurance (to provide information on UI eligibility and processes);

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- Trade Adjustment Assistance (TAA) Program (to provide information regarding TAA petitions);
- Wagner-Peyser (to provide reemployment services information);
- Adult and Dislocated Worker programs (to provide information regarding reemployment and training opportunities); and
- American Job Centers (to provide information regarding reemployment and training opportunities).

After a Rapid Response event has occurred, funds will also be allocated to following up with individuals affected by the event. The Rapid Response Workforce Coordinator will provide individual follow up services to dislocated workers identified by the employer. This follow up serves the dual purpose of measuring the success of the Rapid Response event and assuring that each individual impacted by the event is aware of resources available to them.

Once Nebraska has reserved sufficient funding for Rapid Response activities, any of the remaining funds reserved may be provided to local areas experiencing increases in unemployment due to natural disasters, layoffs, or other events for provision of direct career services to WIOA participants if there are not adequate local funds available to assist the dislocated workers.

Rapid Response Program. In order for the Rapid Response Unit to provide accurate and timely information on all programs available to dislocated workers, the unit collaborates extensively with the following agencies:

- Local one-stop center and operator;
- local boards and chief elected officials;
- Employment Services;
- Economic Development;
- Education;
- Local Community Organizations;
- Adult and Dislocated Worker programs;
- Unemployment Insurance;
- Health and Human Services;
- Veterans Services;
- consumer credit counseling;
- chambers of commerce;
- Trade Adjustment Assistance Program; and
- the Office of Labor Market Information.

Many facets of the workforce system are brought to employees before their dislocation including services of the local American Job Center, allowing employees access to information regarding early intervention and career services of the workforce system. For example, Employment Services staff provide information regarding NEworks and how to search for job openings and information on assessment tools. These early efforts enable the local American Job Center staff to immediately begin identifying barriers to employment and training and determining re-employment strategies.

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Ongoing conversations with employers help to determine special needs and barriers of employees. Local American Job Center staff are kept informed of Rapid Response activities and consulted on a regular basis concerning the need and applicability for early intervention services and the appropriate action to take for each Rapid Response event. The Rapid Response Process is outlined below.

Rapid Response Process

Notification. Notification is the process by which an individual is made of aware of a possible layoff or closing. The knowledge of a layoff or closing can be prompted by both the formal and/or informal information received by any member or the Rapid Response Mandatory Partners. The following sources can be used to find out about a potential closing or downsizing:

- employer files a WARN (Worker Adjustment and Retraining Notification) Notice;
- employer notifies the local workforce system;
- media (written, television, radio);
- chamber of commerce;
- local workforce agencies;
- local elected officials;
- local government and community agencies;
- union officials;
- individual workers; or
- the general public.

Initial Employer Contact. Contacting the employer directly allows the Rapid Response Unit to provide speedy service and allows mandated partner members to be properly aligned. During this step, the State Rapid Response Coordinator will attempt to gather and provide the below information:

- Available programs, services, and resources in the local area such as Unemployment Insurance, reemployment services, job training programs, Trade Adjustment Assistance, and financial counseling to meet the short and long-term assistance needs of the affected workers;
- Rapid Response format, content, and benefits to the employer and employees;
- An assessment of the employer's layoff plans and schedule;
- Identification of the employees affected by the layoff, their current wage scale, occupations, skill levels, and length of service;
- Company benefits available to employees, i.e. severance pay, job development/job search activities, relocation or reemployment opportunities;
- Probable assistance needs of the affected workers;
- Re-employment prospects for workers in the local community;
- Potential for averting the layoff or closure may be discussed in consultation with state or local economic development agencies, including private sector entities such as the local chamber of commerce;

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- Survey on employee demographics, future plans, and interest in services available.
- A list of the employees affected by the layoff, which will be provided to the Rapid Response Mandated Partners.

Announcing the Layoff/Closure/WARN. Once the layoff or closure is verified and if the employer has indicated that the information is confidential, the following individuals will be notified.

- Virtual Service Unit (VSU) Rapid Response Coordinators;
- Unemployment Insurance representative;
- Trade Program Coordinator;
- Wagner-Peyser representative for the designated area;
- Adult and Dislocated Work Program representatives for the designated area;
- Director of the Office of Employment & Training; and
- Labor Law Program Manager.

The following representatives will be notified electronically of *public* layoffs or closures that affect 25 or more employees, in addition to the Rapid Response Mandatory Partners:

- Commissioner of Labor, NDOL;
- Public Information Officer, NDOL;
- Director of Employment & Training, NDOL;
- Administrators of Employment & Training, NDOL;
- Director of Administrative Services, State of Nebraska;
- Director of Unemployment Insurance, NDOL;
- Nebraska Department of Economic Development representative;
- Nebraska Department of Education representative;
- Nebraska Community College Association;
- Chair, Nebraska Workforce Development Board;
- Veterans Program Coordinator;
- Trade Program Coordinator, NDOL
- Director of the Office of Labor Market Information, NDOL
- Field Managers, NDOL
- Depending on the employer's location, the following partners will be contacted:
  - local area chief elected official and chair of the local workforce development board
  - Greater Lincoln Workforce Development Area One-Stop Operator
  - Local chamber of commerce representatives (Metropolitan areas)
  - Greater Omaha Workforce Development Area One-Stop Operator

Rapid Response Program Options. Based on the response and willingness of the employer, the State Rapid Response Coordinator determines the best options for Rapid Response services.

- *Information*. The Rapid Response Unit will provide information to the employer and their employees regarding services and programs available in Nebraska and in their community.
  - Information will automatically be provided to any employer where 10 or fewer workers are impacted.

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  - Information will also be provided to any employer upon request.
- ***Onsite Meeting*.** The Rapid Response Unit will offer every employer who has over 10 employees impacted by the layoff the option of an on-site meeting. This option is detailed below.

Rapid Response Orientation. The Rapid Response Orientation session is the first opportunity to inform the affected workers about the benefits, services, and resources available to assist them during their layoff and transition to new employment. Workers receive information during these sessions and are able to ask questions directly of the subject matter experts on available benefits and services relating to UI benefits, employment services, adult and dislocated worker programs, and other relevant programs.

Onsite. The Rapid Response Orientation session(s) are conducted as far in advance of the projected layoffs as possible. This allows the workers time to absorb the information presented, and begin to make informed decisions based on their individual circumstances, interests, and needs. In order to maximize worker attendance at the Rapid Response Orientation sessions, the meeting is held on-site whenever possible and while the workers are "on the clock." This requires the cooperation and concurrence of the employer and is discussed during the Employer Meeting. When an employer is unwilling or unable to allow the workers to be paid to attend the sessions or for the sessions to be held on-site, the Rapid Response Orientation should be scheduled at a time and place most convenient for the affected workers.

Workers attending the Rapid Response Orientation will receive information on the following agenda items:

- Event Overview;
- Employment Services and NEworks;
- Workforce Innovation & Opportunities Act and One-Stop Office Information;
- Unemployment Insurance Benefits;
- Trade Adjustment Assistance, if Trade certified; and
- Completing the Rapid Response Survey (if applicable).

Other informational items presented include:

- Labor Market Information and related training on in-demand occupations;
- Financial counseling programs;
- Resume and interview guidance;
- Veterans Program assistance;
- Local Health and Human Services programs; and
- Supportive services available from one-stop partners.

Contact information and information methods of accessing benefits, resources, and services are provided to the workers during the Rapid Response Orientation, in order for the workers to be able to follow-up individually with the appropriate entities after the session has been completed. The VSU Rapid Response Coordinator will ensure that contact information for representatives of

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the programs, services, and resources are identified in the agenda for Rapid Response Orientation session.

Post Rapid Response Services. The purpose of follow-up is to ensure each laid off worker is aware of the programs, services, and resources available to them during their transition to reemployment.

VSU Rapid Response Coordinator Follow-Up Services. VSU Rapid Response Coordinators will review the list of employees provided by the employer or from the Rapid Response Orientation sign-in sheet, and provide follow-up services that include, but are not limited to:

- Encourage individuals to complete the initial registration of NEworks; and
- Referring the client to the appropriate partner resources:
  - To assist the individual with writing a resume;
  - Utilizing NEworks;
  - Unemployment Insurance; and
  - Training opportunities.

VSU Rapid Response Coordinators will attempt to contact the laid off worker at least three (3) times via phone, email, or mailing. Contact with the laid off worker is completed three (3) business days after the Rapid Response Orientation or three (3) business days after receiving the employee list.

Once the follow-up services described above have been completed by the VSU Rapid Response Coordinators, the following information will be provided to the Rapid Response Mandatory Partners:

- finalized service plan;
- survey results;
- employee list; and
- Rapid Response Orientation sign-in sheet.

Mandated Partner Services. Depending on the needs of the employees impacted by a dislocation, the Rapid Response Mandatory Partners may coordinate appropriate and necessary services, programs, and activities including:

- workshops based on identified affected workforce needs
- on-site job placement assistance service
- marketing of the workforce talent
  - VSU Rapid Response Coordinators and the Mandated Rapid Response Partners, such as Economic Development or Wagner-Peyser, market the workforce to potential employers. When the workers are ready to compete for new jobs, the Rapid Response Mandatory Partners can focus on broadcasting the worker skills to potential employers. This effort will help ensure that the maximum numbers of workers become re-employed.
- career planning and counseling

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- job fairs

Future Delivery of Rapid Response Services. During this four-year plan, the Rapid Response Unit will focus on the following items of concern:

1. *Streamlining Communication*: Nebraska has multiple areas where information concerning Rapid Response can be found. The Rapid Response Unit intends to consolidate this information into one area to eliminate duplication and ensure it is up-to-date and current. The consolidation of information will allow other agencies, local workforce development boards, and chief elected officials to focus communication efforts in order to be effective and efficient.
2. *Developing a Layoff Aversion System*: Based upon the self-assessment tool provided through the Training and Employment Guidance Letter No. 32-11, Nebraska found that one way to enhance its Rapid Response Program is to develop a Layoff Aversion System. Currently, the Rapid Response program focuses on assisting employers who are in the final stages of closing or laying off individuals. With the development of the layoff aversion system, the Rapid Response Program will be able to assist employers who are in the early stages of possibly either laying off individuals or closing. The layoff aversion system will be similar to how the Rapid Response program is currently organized, but instead of presenting the employees with available programs that may assist them, it will focus on connecting employers with other programs or organizations that may assist in keeping their doors open and not laying off workers. The Rapid Response Unit will build up a local and state contact list of agencies and organizations that are able to assist employers who are struggling. The unit will also conduct outreach and educate local chambers of commerce, financial institutions, and industry associations to encourage employers to connect with the Rapid Response Unit. The initial steps to create this system are currently underway. The goal is to begin this system by targeting specific industries, and then expand to include all industries. Manufacturing is the first industry to receive focus. Representatives from the Rapid Response Program and the Nebraska Manufacturing Extension Partnership have been reviewing other state systems and identifying Nebraska resources to be utilized.

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

In response to a layoff or closure as the result of a natural disaster, the Rapid Response Unit will be able and available to host an event. The State Rapid Response Coordinator (SRRC) will contact the Federal Emergency Management Agency (FEMA) and the Nebraska Emergency Management Agency (NEMA):

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

Through this contact, the SRRC will determine the following information:

- FEMA: Will a Disaster Recovery Center (DRC) be available in the area to all impacted employees? What services are available through your organization and how can workers

access them? It will be pertinent to discuss logistics of internet availability, space restrictions, and capacity limitations.

- NEMA: Has an individual assistance declaration been requested/approved? Was a request for disaster unemployment also requested? What services are available through your organization and how can workers access them?

The SRRC will also coordinate with Unemployment Insurance (UI) during this time. When coordinating with UI, the SRRC will make sure that UI knows the event is being planned as a response to a natural disaster. This information will be provided in the notification. If there is a Presidential declaration for Disaster Unemployment Assistance (DUA), it may impact the information UI provides at a Rapid Response event.

Options for meeting places across Nebraska will depend on the type and severity of the natural disaster along with the location of the affected workers. If there is a Presidential declaration for Individual Assistance (IA), FEMA will open Disaster Recovery Centers (DRCs). These centers may not be ideal for holding a formal presentation but will likely be a gathering place for those affected by the natural disaster. Other location options where the Rapid Response event may take place include Red Cross Stations, community buildings not affected by the disaster, and the nearest American Job Center.

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

- FEMA;
- NEMA;
- Red Cross;
- faith-based organizations; and
- community-based organizations.

(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.

In an effort to ensure all individuals who are Trade-eligible are aware of all services available to them, the Rapid Response Unit representatives will partner with the Trade Program

representatives to conduct a Virtual Rapid Response (VRR). Through the VRR, Rapid Response staff and TAA Program staff will disseminate benefits 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.

- Through the use of videoconferencing technology at local American Job Centers or NDOL locations, the VSU Rapid Response Coordinator will present information regarding all available services to the individual through a PowerPoint presentation. If the Live Meeting software is not working, a conference call will occur.
- This videoconferencing/conference call will occur individually with each Trade-eligible individual who was unable to attend or unaware of the previous Rapid Response event.

This partnership will require the following responsibilities:

- The Trade Adjustment Assistance Workforce Coordinator (TAA WFC) will:
  - recognize potential TAA enrollment;
  - determine need for Virtual Rapid Response (VRR);
  - coordinate dates/times for VRR with participant and VSU Rapid Response staff;
  - email participant name and the date/time for VRR to VSU Rapid Response staff; and
  - include the trade program coordinator and the State Rapid Response Coordinator on all correspondence.
- The Virtual Services Unit Rapid Response Staff (VSU RR) will:
  - receive and review details for VRR from the TAA WFC;
  - confirm VRR Event date/time with the TAA WFC;
  - conduct the VRR;
  - request Rapid Response Event number;
  - record information with the Wagner-Peyser Application in NEworks; and
  - include the TAA WFC and the State Rapid Response Coordinator on all correspondence.

The following illustration provides additional information on the responsibilities described above:

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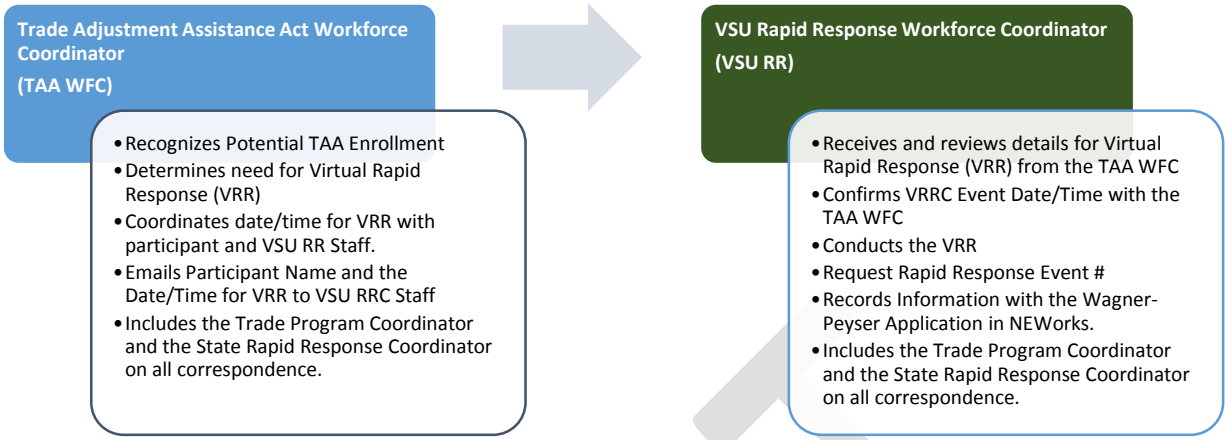

(b) Adult and Dislocated Worker Program Requirements

(1) Work-Based Training Models.

The current funding environment necessitates that the employment and training system provide more services with fewer resources. Therefore, Nebraska continues to explore new service strategies that enhance the ability of all residents and employers to access employment and training services, regardless of where they reside in Nebraska. With shrinking resources and new generations of jobseekers and employers, Nebraska has developed new partnerships and delivery models and a new way of thinking to utilize technology to meet its workforce needs. The following programs and recent accomplishments are essential components in implementing the Combined State Plan for Nebraska's Workforce System.

Nebraska Standards for Career Ready Practice. Nebraska Standards for Career Ready Practice is a joint initiative of Nebraska Department of Labor and the Nebraska Department of Education. Adopted by the Nebraska State Board of Education in December 2011, and by the Nebraska Workforce Investment Board in June 2013, Nebraska Standards for Career Ready Practice teach work readiness skills that all students need to become employable and successful in the workplace. The standards are an outgrowth of the 2009 Nebraska Summit on Career Readiness which defined career readiness as capitalizing "on personal strengths, talents, education and experiences to bring value to the workplace and the community through his/her performance, skill, diligence, ethics and responsible behavior."

Nebraska's Standards for Career Ready Practice were designed in conjunction with the National Career Clusters Framework, which has been developed over the past decade with input from national business and industry committees expressing the most critical skills needed for employee and or entrepreneur success.

The standards provide a valid basis for setting workplace expectations for all students to be career-ready and describes areas of expertise that educators at all levels should seek to develop

in their students. The career readiness standards rest on important practices and proficiencies having long-standing importance in career education and should be used over and over again with increasing complexity and relevance by students as they progress through their educational pathway. The 11 standards accessed at www.education.ne.gov/nce/ are provided as a resource to assist schools, colleges, teachers and faculty members in defining curricular and assessment outcomes. Educators are encouraged to work with local business and industry councils to define learning objectives most appropriate for their situation.

NELearn. Nebraska Department of Labor continues their strong partnership with the Nebraska Department of Economic Development and Nebraska Department of Education to promote virtual learning to the public through the website www.nelearn.nebraska.gov. This website connects the public with free learning tools to assist them in their careers and highlights the following programs:

H3 – High-Wage, High-Skill, High-Demand. Combines labor market information, economic development information, and real-time job market information into an easy, understandable layout for the public to gain a better understanding when identifying the high-wage, high-skill, high-demand occupations within Nebraska.

Career Readiness. Online learning modules developed to help individuals improve their basic skills for job readiness. They can strengthen their knowledge on the following topics:

- seeking employment;
- workplace success;
- communication;
- presentations;
- conflict resolution;
- decision making
- teamwork and leadership;
- workplace ethics;
- social and cultural awareness; and
- financial and personal well-being.

iPathways. Online instructional program designed for the GED prep student. Nebraska offers a hybrid model of this program under which the student attends class in person at least two times a month to meet with the instructor. Adult education programs offer appropriate students the online instruction option after pre-testing is complete and a determination has been made as to whether the student is a good candidate for distance learning.

USA Learns. Virtual instructional program that is committed to assisting English as a Second Language (ESL) students. This is a highly versatile program that can be used in or outside of the classroom, and on various levels of understanding. The program focuses on three main areas of learning: survival skills, workplace skills, and the practice of reading and writing.

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*CON**NE**CT Grant*. In October 2014, the Nebraska Department of Labor was awarded a four-year $9.2 million H-1B Ready to Work Partnership grant. Nebraska's CON**NE**CT program is a partner-driven strategy that focuses on the reemployment of long-term unemployed workers in IT occupations. This program is working to create a systems reform effort to bridge the skills and education gaps between the available workforce and IT employment positions across multiple industries.

In collaboration with leading employers in the IT field, the Nebraska Department of Labor, Metropolitan Community College (MCC), and the University of Nebraska–Omaha (UNO) partnered together on this project to improve Nebraska's ability to educate, train, and recruit a qualified workforce that meets Nebraska's current and future IT industry needs within an ever-changing industry-driven economy. This partnership has leveraged resources and gained industry input to create an integrated service model that has allowed for maximum enrollment of the long-term unemployed.

Through a combination of education and work-based training programs, CON**NE**CT is providing a structured training opportunity in which participants gain the knowledge, competencies, and credentials necessary to be successful in the IT industry.

Two full-time program coordinators were hired to develop and implement program initiatives, recruit and case-manage program participants, and coordinate efforts with key strategic education and employer partners. The coordinators have utilized internal Nebraska Department of Labor reporting, data mining, labor market research, and relationships with strategic community-based referral partners to identify, inform, and enroll program participants. CON**NE**CT's primary training/educational partners, MCC and UNO, have achieved outstanding progress both in adding dedicated staff to support program participants and in the development of infrastructures that will be critical to the overall success of the program. A formal kickoff event was held in June 2015, and CON**NE**CT staff are actively engaging community-based programs/organizations in the Omaha Metro-Area. Outreach efforts have targeted community-based programs both in and outside the scope of the Nebraska Department of Labor and other government agencies, and have been focused on reaching programs and organizations who provide services to, and interact with, overlapping segments of the population who meet the eligibility requirements for CON**NE**CT.

On-the-Job Training. On-the-Job Training provides an individual with the opportunity to be trained with the knowledge and skills necessary for the full and adequate performance of a specific job. Employers may be from the private, private non-profit, or public sectors.

A training contract must be developed between NDOL and the employer providing the training. NDOL will conduct a pre-award review with the employer to determine if the employer is qualified and capable of entering into a contractual agreement to provide on-the-job training. Employers may refer individuals to NDOL staff for a determination of program eligibility and assessment of suitability for on-the-job training.

Eligibility. An On-the-Job Training candidate cannot have worked for the employer at any time in the past, regardless of position, title or length of term since separation. The employer must intend to retain the employee in the occupation and at the wage rate provided by the contract, after the end of the training period (subject to the employer's right to terminate the trainee for normal business or personal reasons as appropriate).

OJT Restrictions

1. Employers are not eligible for OJTs if they:
   - Have exhibited a pattern of failing to provide OJT clients with continued long-term employment, wages, benefits, and working conditions equal to regular employees who have worked a similar length of time at the same type of work.
   - Have been debarred or suspended from receiving federal contracts.
2. OJTs will NOT be developed for positions that:
   - Do not provide a self-sufficient wage (a self-sufficient wage is defined as a wage that provides sufficient income to support a minimally decent standard of living, without public cash assistance);
   - Receive a majority of pay from commission or piece rate wages;
   - Are intermittent or seasonal;
   - Are temporary positions (except when the employer has the common practice of hiring all employees on a temporary basis, and letting them work into full-time permanent status after achieving pre-determined productivity levels, meeting qualitative standards, maintaining satisfactory attendance record, and/or other criteria as specified in the company's personnel policy);
   - Use temporary employees who are supplied to an employer by a temporary agency/contractor;
   - Are with companies which have experienced a greater than average turnover rate during the preceding twelve-month period for similar types of industries;
   - Are in industries with a substantial number of experienced and able workers who are presently unemployed within the same labor market area (50 - mile radius); or
   - Are with a company that has relocated within the United States, Washington DC, and its territories (until 120 days after the date on which such establishment commences operations at the new location, if the relocation results in a loss of employment for any employee at the original location.

Incumbent Worker Training. Under NDOL's Incumbent Worker Training Programs policy and pursuant to the applicable sections of WIOA Section 134, local boards may utilize up to 20 percent of Adult Employment and Training Activities and Dislocated Worker program funds to reimburse employers providing incumbent worker training, based on the size of a business. Participating employers pay the remaining share of the costs not covered by WIOA program funds. The local workforce development board establishes the employer's share of cost based on number of employees participating in the training, wage and benefit levels of participating employees, the relationship of the training to the competitiveness of the employer and employees, and the availability of other employer-provided training and advancement opportunities. For the

employer's share of cost, a sliding scale has been established based on employer size at the local operation where the training will be provided. The employers' share of cost will not be less than:

- 10 percent of the cost for employers with 50 or fewer employees;
- 25 percent of the cost for employers with more than 50 to 100 employees; and
- 50 percent of the cost for employers with more than 100 employees.

The share provided by an employer participating in the program may include the amount of wages paid by the employer to a worker while the worker is attending training. The employer may provide its share of cost in cash or in kind. Official payroll records documenting the worker's hours and wages are utilized to determine the amount of the employer's share of cost. Funds provided for incumbent worker training cannot be used to pay the wages of incumbent employees during their participation in an economic development activity provided through the statewide workforce system. In addition, when the relocation of a business results in the loss of employment of any employee of that business, funds provided for training cannot be used for incumbent worker training until after 120 days have passed since the relocation that caused the loss of employment at the original business location in the U.S.

Transitional Jobs. Under WIOA Section 134(d)(5), local areas may use up to 10 percent of their combined total allotments for adult and dislocated worker funds for providing transitional jobs to individuals to enhance their employability. The subsidized time-limited work experiences for individuals with barriers to employment, such as chronic unemployment or inconsistent work history, may be in the public, private, or non-profit sectors. Transitional jobs can be effective solutions for gaining work experience not otherwise attainable through training or on-the-job-training. While there is no expectation that the individual will continue with the employer providing the transitional-job opportunity, the goal is to establish work history, demonstrate work success, and develop skills that lead to unsubsidized employment.

Job Driven National Emergency Grant. In July 2014, NDOL was awarded the Job Driven National Emergency Grant (JDNEG) by the U.S. Department of Labor. Nebraska's JDNEG project is a partner-driven strategy that creates reemployment services and work-based trainings for dislocated workers, the long-term unemployed, underemployed, and veterans returning from service. This industry-driven project will help connect and prepare participants for employment opportunities in manufacturing and transportation, distribution, and logistics industries.

The JDNEG project primarily utilizes on-the-job training services to assist JDNEG participants. JDNEG on-the-job training activity is provided under a contract with an employer in the private non-profit or private for-profit sectors. This training arrangement is an exception to the Individual Training Account (ITA) requirement specified in Section 134 of the Workforce Innovation and Opportunity Act (WIOA).

Under the JDNEG and NDOL's JDNEG policy, certain requirements are established for on-the-job training contracts. Contracts for on-the-job training services must be in writing and must ensure that participants are provided a structured training opportunity where the participant is able to gain the knowledge and competencies necessary to be successful in the occupation for which

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they receive training. The training services are provided in a manner that maximizes consumer choice in the selection of an eligible provider of on-the-job training services.

(2) Registered Apprenticeship.

In December 2008, a team of NDOL and union representatives attended the Action Clinic hosted by U.S. Department of Labor Employment and Training in Chicago. As a result, the following initiatives were implemented:

- NDOL added an "Apprenticeship" button on the home page of the NDOL website, leading to information about apprenticeship programs and Nebraska sponsors. In 2015, NDOL's website was redesigned. Information on Registered Apprenticeships was relocated to the Employment and Training homepage of the NDOL website and an "Apprenticeship" link was added under each of the "Job Seeker Resources" and "Employer Resources" columns. When clicked, each link takes you to a "Registered Apprenticeships" page where general information on Registered Apprenticeships is located along with two additional links (buttons), one for "Job Seekers" and the other for "Sponsors and Employers" where information specific to each customer group is located. The "Job Seekers" page, titled "The Apprenticeship Advantage," defines apprenticeship, describes the competitive advantage job seekers gain through apprenticeships, and includes links to the U.S. Department of Labor's list of available apprenticeship occupations and searchable program sponsors database. The "Sponsors and Employers" page, titled "Apprenticeships for Employers," describes the benefits of sponsoring an apprenticeship program and includes links to the U.S. Department of Labor's list of available apprenticeship occupations, guide on Setting up a Registered Apprenticeship Program, and Quick-Start Toolkit: Building Registered Apprenticeship Programs.
- NDOL and the Steamfitters & Plumbers Local 464 entered into a Memorandum of Understanding to conduct annual recruitment and assessment activities through the local One-Stop Career Center.
- NDOL and the International Brotherhood of Electrical Workers (IBEW) 22 began a partnership where workers can gain entry into the IBEW Apprenticeship Program. The local One-Stop Career Center screens job seekers for specific qualifications and has developed a list of interested candidates to call upon when Local 22 contacts the Center to send candidates to them for a job assignment.

NDOL plans to expand apprenticeship and work based learning opportunities through:

- continuation of a strong, committed working relationship with state and local union officials;
- continued exploration of a more robust utilization of work place learning and/or apprenticeship programs in partnership with secondary education providers and community colleges; and
- continued networking with the Nebraska State Director, U.S. Department of Labor Office of Apprenticeship, on educating appropriate entities about apprenticeship opportunities.

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To ensure the resources available through Federal and/or state apprenticeship programs are integrated with Nebraska's One-Stop delivery system, NDOL's Apprenticeship policy was developed in coordination with the Nebraska State Director, U.S. Department of Labor Office of Apprenticeship. This policy recognizes apprenticeship programs as an effective and time-honored way to build a skilled, knowledgeable, and loyal workforce. In accordance with this policy, "entities that carry out programs under the National Apprenticeship Act must meet the requirements specified in WIA Section 122, the final implementing regulations, and NDOL's Eligible Training Provider Policy to be certified as an eligible provider to receive WIA Adult and Dislocated Worker funds through Individual Training Accounts." Many apprenticeship programs have chosen to be certified as eligible providers. NDOL's PYs 2012-2013 Local Plan Instructions policy states that the U.S. Department of Labor Employment and Training Administration's "Vision for 21st Century Apprenticeship (TEN 17-06)" is a useful resource and should be addressed as part of the Local Vision, Goals, and Priorities.

(3) Training Provider Eligibility Procedure.

Following consultation on October 16, 2015 with the Nebraska Workforce Development Board, established information requirements, eligibility criteria, performance reporting requirements and standards, and procedures on provider eligibility to receive WIOA Title I funds for providing training services in local areas.

Information Requirements. To be considered for inclusion on Nebraska's eligible training provider list (ETPL), a provider must provide the following information:

- provider demographics;
- information regarding regulatory compliance; and
- an indication of whether the provider has an existing data-exchange agreement with NDOL; and
- verifiable program-specific information describing the:
  - program and its minimum enrollment requirements;
  - qualifications of instructors;
  - provider partnerships with businesses relating to the program; and
  - alignment of the program with in-demand industry sectors and occupations; and
  - program performance; and
- program costs, methods of instruction, length, and schedule.

Eligibility Criteria. To be considered for inclusion of the ETPL:

- a provider must fall under one of the following categories:
  - postsecondary education institution;
  - other public or private provider of training;
  - local board that meets certain conditions (as described in WIOA Section WIOA Section 122(h)(1));
  - community-based or private provider under contract with a local board; or
  - Registered Apprenticeship program;

- a provider must be licensed to operate and/or authorized to recruit students by the Nebraska Department of Education as required under the Nebraska Private Postsecondary Career School Act if the provider is a private postsecondary career school;
- a provider and its programs must comply with the nondiscrimination requirements of WIOA, which include prohibitions against:
  - discrimination on the basis of age, disability, sex, race, color, national origin, or political affiliation or belief, or student status;
  - discrimination against certain noncitizens; and
  - assistance for facilities used for religious instruction or religious worship;
- a provider must have been in operation at least twelve (12) months at the time of application for eligibility;
- a provider must enter into a data-exchange agreement with NDOL in order for NDOL to verify employment-after-exit data as required under WIOA;
- a program must meet or exceed the following minimum performance standards, except as stated directory below:
  - ≥50% of students who enrolled in the program are in unsubsidized employment during the second (2nd) quarter after exit from the program based on the latest-available verifiable wage data;
  - ≥65% of students who enrolled in the program are in unsubsidized employment during the fourth (4th) quarter after exit from the program based on the latest-available verifiable wage data; and
  - ≥$7,020 median quarterly earnings, based on the latest-available verifiable wage data, for students who enrolled in the program and are in unsubsidized employment during the fourth (4th) quarter after exit from the program, regardless of whether the students obtained a recognized postsecondary credential.

At least five (5) students must be enrolled in a program for the minimum performance standards to be used in determining eligibility.

Providers who have been debarred by the Federal government and programs associated with occupations that pay commission-only earnings will not be considered for eligibility.

NDOL takes into consideration the following criteria when determining eligibility:

- provider performance;
- ensuring access to training services throughout Nebraska and through the use of technology;
- information reported to state agencies on Federal and state training programs other than programs authorized by WIOA Title I-B;
- how programs relate to in-demand industry sectors and occupations in Nebraska;
- state licensure requirements of providers;
- encouraging the use of industry-recognized certificates and credentials;
- provider ability to offer programs leading to recognized postsecondary credentials;
- credentials of the provider's instructors and/or trainers;

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- the quality of programs and ability of providers to provide programs to individuals who are employed and to individuals with barriers to employment;
- whether providers timely and accurately submit performance reports; and
- other factors NDOL may determine are appropriate.

Minimum program performance standards for providers and/or programs will be reviewed by the Nebraska Workforce Development Board on a biennial basis.

Continued Eligibility for WIA-eligible Providers. Any provider eligible under WIA as of July 21, 2014 (WIA-eligible Provider) must apply for continued eligibility for each of its WIA-eligible programs in order to continue receiving WIOA Title I funds after June 30, 2016 for the provision of training services for those programs. Eligibility is determined on a program-by-program basis. Continued eligibility is limited to a period of two (2) years for each NDOL-approved program commencing on the date of determination of continued eligibility. The provider must renew its continued eligibility for each NDOL-approved program in order to continue receiving WIOA Title I funds after the program's two-year period of continued eligibility ends.

Initial Eligibility for New Providers. Any provider not previously eligible under WIA, as described directly above, must apply for initial eligibility for each program it intends to offer as an NDOL-approved program in order to receive WIOA Title I funds for the provision of training services. Eligibility is determined on a program-by-program basis. Initial eligibility is limited to a period of one (1) fiscal year for each NDOL-approved program. For purposes of NDOL's policy on Eligible Training Provider Initial and Continued Eligibility, "fiscal year" is defined as the 12-month period commencing on the date of determination of initial eligibility for the applicable program. The provider must renew its eligibility and establish continued eligibility for each NDOL-approved program in order to continue receiving WIOA Title I (adult and dislocated worker) funds after the program's one-year period of initial eligibility ends. Continued eligibility is limited to a period of two (2) years commencing on the date of determination of continued eligibility.

Initial Eligibility for New Programs. For providers that have established continued eligibility and are applying for eligibility for a new program for which program-performance data is not available, the new program will receive initial approval for a period of one (1) year. At the end of the one-year period, the provider must renew the program's eligibility and establish continued eligibility for that program in order to continue receiving WIOA Title I (adult and dislocated worker) funds.

Registered Apprenticeship Programs. Registered Apprenticeship programs are automatically qualified, included, and maintained on the ETPL for as long as the program remains registered with the U.S. Department of Labor Office of Apprenticeship or until the Registered Apprenticeship program notifies NDOL by email at ndol.wioa_policy@nebraska.gov and requests the program be removed from the ETPL.

Application Process. To apply for eligibility and inclusion on the ETPL, providers must follow the process outlined below.

A. A provider must accurately complete a Word version of the eligible training provider application. The application has two (2) parts:
   1. Section A. Training Provider Information – to be completed once per application
   2. Section B. Program Information – to be completed once for each program the provider intends to offer as a NDOL-approved program
B. A provider must submit the completed application by email to ndol.wioa_policy@nebraska.gov for review and determination of eligibility.
C. Except as described above for WIA-eligible Providers seeking continued eligibility under WIOA, applications may be submitted at any time.

Review and Determination of Eligibility

For WIA-eligible Providers

1. Applications submitted by WIA-eligible providers on or before February 1, 2016 will receive priority review and notification of determination on or before March 1, 2016.
2. Applications submitted on or before March 1, 2016 by WIA-eligible providers that have submitted a signed letter of intent will receive priority review and notification of determination on or before April 1, 2016.
3. Review of incomplete applications will be delayed until all information required in the application is provided in accordance with this guide.

For Providers following Traditional Training/Academic Calendars

1. Except as described above for WIA-eligible Providers seeking continued eligibility under WIOA, applications submitted by providers offering programs that follow a traditional quarter or semester calendar are reviewed on a quarterly basis by NDOL during the following timeframes:
   - October 1 through October 31
   - January 1 through January 31
   - April 1 through April 30
   - July 1 through July 31
2. Applications must be received by NDOL on or before the last day of the month preceding the scheduled quarterly review period (example: on or before September 30 for consideration during the October 1 through October 31 quarterly review period). Applications received after the last day of the month preceding the scheduled quarterly review will be reviewed during the next scheduled quarterly review period.
3. NDOL will notify providers by email of NDOL's determination of eligibility. Notice of determination will be issued no later than the 31st day after the end of the quarterly review period, provided that the application is complete upon receipt by NDOL.
4. Review of incomplete applications will be delayed until all information required in the application is provided in accordance with this guide.

For Providers following Non-traditional Training/Academic Calendars

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1. Except as described above for WIA-eligible Providers seeking continued eligibility under WIOA, applications submitted by providers offering programs that follow a non-traditional calendar are reviewed on an as-needed basis.
2. NDOL will notify providers by email of NDOL's determination of eligibility. Notice of determination will be issued no later than the 61st day after the date of submission of the application, provided that that application is complete upon receipt by NDOL.
3. Review of incomplete applications will be delayed until all information required in the application is provided in accordance with this guide.

(4) Implementation and Monitoring Priority

Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E).

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(5) Transfer of Funds between Adult and Dislocated Worker Programs

Nebraska's criteria regarding local area transfer of funds between adult and dislocated worker programs are established in NDOL's Local Area Plan Modifications and Revisions policy which is consistent with WIOA Section 133(b)(4) as it applies to transfer of funds between adult and dislocated worker programs. The policy permits a local area board to transfer funds between both programs, up to and including 100 percent of the funds allocated for adult employment and training activities and dislocated worker employment and training activities for a fiscal year. The policy requires all proposed local area plan modifications and revisions be submitted electronically to NDOL's Office of Employment and Training, which must include:

- Documentation that the local area board provided adequate opportunity for public comment on plan modifications or revisions, including:
  - Making copies of the proposed changes available to the public through electronic and other means, such as public hearings and local news media including an opportunity for comment by members of the public, including representatives of business, labor organizations, and education;
  - providing no more than a 30-day period for comment on the proposed changes before submission to NDOL, beginning on the date on which the proposed changes are made available to the public; and
  - submission of any comments to NDOL that express disagreement with the proposed changes.

(c) Youth Program Requirements.

(1) State-developed Criteria for Awarding Grants for Youth Workforce Investment Activities

WIOA places an emphasis on serving youth within a comprehensive youth development approach that focuses on long-term services that provide the education, skills, work experience, and support that youth need to successfully transition to careers and productive adulthood. The program design framework is an essential ingredient in helping local areas develop

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comprehensive service strategies based on individual needs. WIOA encourages local decision making in the area of youth policy, youth program design, the allocation of funds for each program element, and the determination of appropriate program offerings for each individual youth. It is essential that established policies help to achieve program quality and successful outcomes for youth.

Program Design. NDOL's Youth Program Design policy defines criteria for design of youth programs in the local areas as prescribed by WIOA.

Objective Assessment. In order to identify suitable services and career pathways for participants, the program should objectively assess the academic and skill levels and service needs of each participant, which must include a review of:

- basic skills;
- occupational skills;
- prior work experience;
- employability;
- interests;
- aptitudes (including interests and aptitudes for nontraditional jobs);
- supportive service needs; and
- developmental needs.

If a program provider determines it is appropriate to use a recent assessment of the participant conducted through another education or training program a new assessment is not required.

Individual Service Strategy. The program must develop individual service strategies for each participant that:

- are directly linked to one or more indicators of performance described in WIOA section 116(b)(2)(A)(ii); and
- identify career pathways that take into account the objective assessment and include appropriate education and employment goals, (including nontraditional employment, when appropriate), achievement objectives, and services.

If an individual service strategy has been recently developed for the participant under another education or training program, new individual service strategy is not required. Regardless of where the individual services strategy originates, it must provide:

- activities leading to a secondary school diploma or GED or a recognized postsecondary credential;
- preparation for postsecondary educational and training opportunities;
- strong linkages between academic instruction and occupational education that lead to recognized postsecondary credentials;
- preparation for unsubsidized employment opportunities, when appropriate; and
- effective connections to employers in in-demand industry sectors and occupations in local and regional labor markets.

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Information and Referrals. The local board must ensure that each participant is provided:

- Information on applicable or appropriate services available through the local board, providers found eligible by the board, or American Job Center partners; and
- referral to appropriate training and educational programs capable of serving the participant either on a sequential or concurrent basis.

Linkages. Local boards must establish linkages with local educational agencies responsible for services to participants as appropriate.

Applicants Not Meeting Enrollment Requirements. In order to meet the basic skills and training needs of eligible applicants who do not meet the enrollment requirements of a particular program or who cannot be served by the program, each local WIOA service provider must ensure youth are referred:

- for further assessment, as necessary; and
- to appropriate programs that have the capacity to serve them.

Involvement in Design and Implementation. Local boards must ensure that parents, participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs. Evidence of this involvement in the design and implementation of the youth program must outlined in the local area plan.

Volunteer Activities. Local boards must ensure that successful youth program participants have opportunities to volunteer to help other youth participants through mentoring, tutoring, and other activities. Local area plans must describe how volunteer opportunities are afforded to successful youth program participants.

(2) Youth Program Elements

Nebraska will ensure that the fourteen (14) youth program elements required under WIOA Section 129(c) are made available to all eligible youth participants through NDOL's Youth Program Design policy. The policy requires that local areas establish youth program policies that define criteria for the design, elements, and parameters of youth programs.

Availability. Consistent with WIOA Section 129(c)(5), the policy does not require that each local area provider of youth services must provide all fourteen (14) required elements. Instead, the policy requires that the local area provide access to all of the fourteen (14) required elements.

Implementation. Local area boards must ensure that parents, youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs. Evidence of this involvement in the design and implementation of the youth program must be outlined in each local area plan.

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(3) Requiring Additional Assistance

Definitions and eligibility documentation requirements regarding the "requires additional assistance to complete an educational program or to secure and hold employment" criterion must be established at the local level. Local areas are required to create a local policy that includes these designations and eligibility documentation requirements as well as include this language in their local area plan.

(4) Definition of Not Attending School and Attending School

Neb. Rev. Stat. § 79-201. Compulsory education; attendance required; exceptions; reports required.

(1) For purposes of this section, a child is of mandatory attendance age if the child (a) will reach six years of age prior to January 1 of the then-current school year and (b) has not reached eighteen years of age.

(2) Except as provided in subsection (3) of this section, every person residing in a school district within the State of Nebraska who has legal or actual charge or control of any child who is of mandatory attendance age or is enrolled in a public school shall cause such child to enroll in, if such child is not enrolled, and attend regularly a public, private, denominational, or parochial day school which meets the requirements for legal operation prescribed in Chapter 79, or a school which elects pursuant to section 79-1601 not to meet accreditation or approval requirements, each day that such school is open and in session, except when excused by school authorities or when illness or severe weather conditions make attendance impossible or impracticable.

(3) Subsection (2) of this section does not apply in the case of any child who:

- (a) Has obtained a high school diploma by meeting the graduation requirements established in section 79-729;
- (b) Has completed the program of instruction offered by a school which elects pursuant to section 79-1601 not to meet accreditation or approval requirements;
- (c) Has reached sixteen years of age and has been withdrawn from school pursuant to section 79-202;
- (d) (i) Will reach six years of age prior to January 1 of the then-current school year, but will not reach seven years of age prior to January 1 of such school year, (ii) such child's parent or guardian has signed an affidavit stating that the child is participating in an education program that the parent or guardian believes will prepare the child to enter grade one for the following school year, and (iii) such affidavit has been filed by the parent or guardian with the school district in which the child resides;
- (e) (i) Will reach six years of age prior to January 1 of the then-current school year but has not reached seven years of age, (ii) such child's parent or guardian has signed an affidavit stating that the parent or guardian intends for the child to participate in a school which has elected or will elect pursuant to section 79-1601 not to meet accreditation or approval requirements and the parent or guardian intends to provide the Commissioner of Education with a statement pursuant to subsection (3) of section 79-1601 on or before the child's seventh birthday, and (iii) such affidavit has been filed by the parent or guardian with the school district in which the child resides; or

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(f) Will not reach six years of age prior to January 1 of the then-current school year and such child was enrolled in a public school and has discontinued the enrollment according to the policy of the school board adopted pursuant to subsection (4) of this section.

(4) The board shall adopt policies allowing discontinuation of the enrollment of students who will not reach six years of age prior to January 1 of the then-current school year and specifying the procedures therefor.

(5) Each school district that is a member of a learning community shall report to the learning community coordinating council on or before September 1 of each year for the immediately preceding school year the following information:

(a) All reports of violations of this section made to the attendance officer of any school in the district pursuant to section 79-209;

(b) The results of all investigations conducted pursuant to section 79-209, including the attendance record that is the subject of the investigation and a list of services rendered in the case;

(c) The district's policy on excessive absenteeism; and

(d) Records of all notices served and reports filed pursuant to section 79-209 and the district's policy on habitual truancy.

(5) Definition of Basic Skills Deficient

Basic Skills Deficient: The state defines "basic skills deficient" (per WIOA Section 3(5)) as an individual:

- Who is a youth that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- Who is a youth or adult that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

(d) Single-Area State Requirements

Not applicable.

(e) Waiver Requests (optional)

None at this time. However, as Nebraska fully implements the Workforce Innovation and Opportunity Act, Nebraska will seek waivers as needed and appropriate.

Title I-B Assurances

The State Plan must include assurances that:	
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 or basic skills deficient;

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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;
3.	The State has 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;
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);
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;
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;
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);
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;
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;
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
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);

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Wagner-Peyser Act Program (Employment Services)

(a) Employment Service Professional State Development

(1) Professional Development Activities

Professional development opportunities will be made available to Employment Services staff via a variety of methods, including but not limited to:

- Wagner-Peyser in-service trainings provided by the Program Administration, focused on specific topics/agenda items that will provide insight and guidance to assist job in performing Wagner-Peyser duties
- State of Nebraska's Employee Development Center (EDC), which provides training opportunities in-person and via technology (webinars, recorded trainings, live streaming, etc.) on a variety of topics ranging from technical skills to customer service for government employees
- WIOA, workforce and community partner trainings and conference opportunities
- National webinars hosted by US Department of Labor webinars, Wofkorce3One, etc.
- Equal Employment Opportunity (EEO) training
- Limited English Proficiency (LEP) Plan training

The Wagner-Peyser program will create staff development opportunities based on Wagner-Peyser business needs, special projects and areas identified for technical assistance. Staff development opportunities identified out of technical assistance need will be mandatory to Wagner-Peyser staff responsible for the duties identified.

Staff development will focus on assessing and reinforcing the core responsibilities and functions of the Wagner-Peyser program, while also addressing new opportunities for Wagner-Peyser to expand its role with special projects or initiatives. To the greatest extent possible, Wagner-Peyser will leverage existing resources that have proven effective for staff professional development. Limited resources and staff located across the state create a challenge for face to face staff development opportunities. Technology is one strategy that will be leveraged to overcome these barriers. An additional strategy will be to utilize peer-to-peer mentoring and training opportunities. Staff development opportunities will be provided to staff based on a variety of identified needs, skills and assets. Staff that participate in staff development will return to their home offices and regions and will share the information they received in order to maximize the staff development outcomes for as many staff as possible.

A primary focus for Wagner-Peyser professional development will center around the NEres program. As Nebraska's Re-Employment Services program, NEres serves job seekers from all facets of life in their reemployment journey. The varied circumstances that NEres customers face will require Wagner-Peyser staff to be finely attuned to the resources available, and communication skills needed to actively engage this audience.

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Professional development activities, whether leveraging internal or external resources, will be evaluated to determine the effectiveness of the information provided. This evaluation may include, but is not limited to:

- Evaluations of staff participating in the training
- Follow-up with direct Managers on the progress and enhancements to staff performance
- Quality assurance information obtained from the program to determine progress towards technical assistance needs

(2) Training and Awareness

Wagner-Peyser partners closely with the Unemployment Insurance (UI) partner to create NEres, Nebraska's Re-Employment Services program. NEres is an integrated reemployment program focused on connecting unemployed individuals with the full range of re-employment services available through the Nebraska Department of Labor (NDOL). NEres seeks to accelerate opportunities for individuals to obtain gainful employment after separation from their job. NEres efficiently utilizes financial and human resources by consolidating re-employment programs to provide high quality employment services to assist unemployed individuals on their path to re-employment. The NEres program meets the federal requirements of the UI funded Reemployment Services and Eligibility Assessment (RESEA) program. The use of high quality, effective re-employment tools is the cornerstone of the NEres program and provides a key strategy to developing an available workforce for Nebraska. The offices of Employment and Training (E&T) and Unemployment Insurance (UI) collaborate and continue to strengthen partnerships to provide employment services and re-employment assistance to Nebraskans impacted by job loss.

Employment Services views individuals as job seekers, with potentially additional target population status: UI claimant, dislocated worker, TANF recipient, veteran, etc. Because ES staff work with customers served by other workforce programs, a key strategy for Employment Services is to be trained in the basic content/information of partner programs, so as to have a basic understanding of the experience and needs of the shared job seeker and UI customer.

NEres is a critical piece of the training strategy between UI and Employment Services. The NEres program manual outlines the program rules and procedures. The program manual and operating procedures were developed in partnership with UI supervisors and program administration to ensure that information impacting UI customers is accurately communicated to Employment Services staff. Beyond UI's contribution to the NEres program manual, Employment Services staff are trained directly by UI Supervisors in UI program language and information that relates to UI claimants, who are also Employment Services customers. UI training topics include, but are not limited to:

- UI Claimant Guide Information
- UI Work Search Requirements
- UI Work Search Logs
- UI Approved Training
- UI Eligibility Review Form
- UI Eligibility Issues
- RESEA Profiling Criteria
- Benefit Payment System (BPS)

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These training topics are covered by UI Supervisors to ensure the most accurate information is provided to Employment Services staff. UI training materials, such as guides, presentations and quizzes, are incorporated into Employment Services staff resources, to create a library of available information.

(b) Meaningful Assistance

UI provides dedicated phone lines in the state's American Job Centers. Phones are labeled with a sign designating them as a resource for individuals seeking assistance with filing a UI claim. In addition to the dedicated phones, there are also dedicated computers for use of filing a UI claim. Employment Services staff are trained on the process for UI claim filing by customers and provide direct assistance with customer questions about the general UI process. While Employment Services staff are not equipped to provide direct information on UI customer benefits, the American Job Centers focus on quality customer service and a streamlined customer experience.

One-stop centers are provided UI information and materials that can be provided to customers with questions on filing UI claims. The information can be reviewed with the customers to clarify language and provide guidance on the steps a customer must follow to file a UI claim. The use of NEworks as the integrated system for customers to register for work and file a UI claim in Nebraska streamlines the process for customers by allowing American Job Centers to provide information and assistance for the single-sign on system. Center staff are trained on the NEworks system as a tool to provide Employment Services. The staff's strong knowledge and constant use of the system allows them to provide meaningful assistance to UI claimants as they use the system to file UI claims, register for work, and meet Nebraska's work search requirements.

Meaningful assistance is interpreted by Employment Services to be customer oriented and focused on their needs, not simply their requests. Meaningful assistance will be provided via direct information related to filing of UI claims and additional support and guidance for around work search activities. Employment Services staff are cross-trained with UI staff and supervisors to have a better understanding of the claimants' experience and challenges when filing a UI claim. This information and shared experience provides the customer with as much assistance as possible, whether they are talking to Employment Services staff or UI staff.

(c) Reemployment assistance

Vision and Purpose. Nebraska's reemployment strategy for UI claimants and other unemployed individuals has led to the development of the NEres program. NEres creates a single, comprehensive service model for delivering re-employment services with the UI claimant as the core consumer of the model. UI claimants are customers of the comprehensive workforce system and are inherently job seekers. The recent economic downturn has changed the way Nebraska must assist UI claimants. NEres places an emphasis on early intervention and continuing engagement with UI claimants, with a goal of gainful employment. This re-employment strategy allows customers to enter the re-employment system through a common entry point which will allow the customer to be connected with the array of services and tools needed for effective job

searching and rapid reemployment. With NEres, Nebraska uses technology and innovative strategies to more thoroughly assist UI claimants in their return to the workforce.

NEres connects unemployed individuals with the full range of re-employment services available through the Nebraska Department of Labor (NDOL). NEres seeks to accelerate opportunities for individuals to obtain gainful employment after separation from their job. Reducing the period of unemployment for individuals is beneficial to both the individual and Nebraskan employers in the following ways:

- UI claimants will see a quicker return of lost wages.
- Employers will be able to fill open positions faster, effectively increasing productivity.
- When UI recipients spend less time out of work, money will be saved in the unemployment trust fund, which may help to contain employer unemployment taxes.

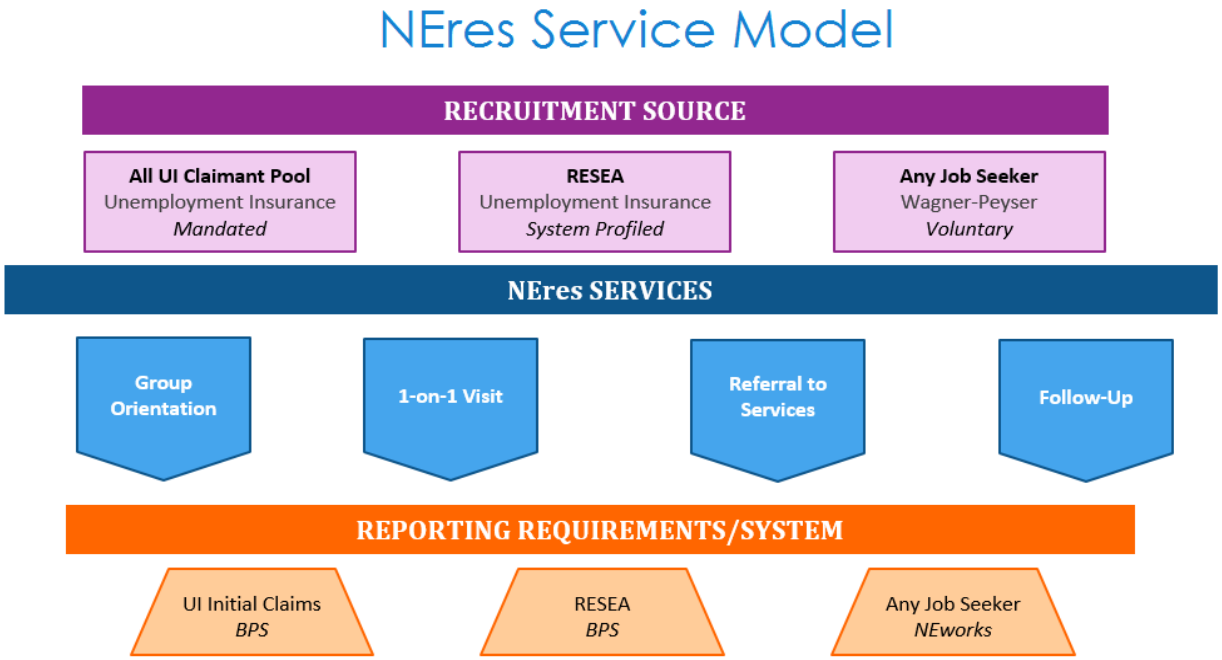
NEres efficiently utilizes financial and human resources by consolidating re-employment programs to provide high quality employment services to assist unemployed individuals on their path to re-employment. The NEres program was developed to meet the federal requirements of the Worker Profiling Reemployment System (WPRS) and Reemployment and Eligibility Assessment (REA) programs. NEres has evolved to meet the standards of newly implemented of Reemployment Services and Eligibility Assessment (RESEA) program, which replaced REA. Since its development, NEres has expanded its services to include all initial non-exempt Unemployment Insurance claimants in order to provide early intervention and resources to promote quick entry back into the workforce. The use of high quality, effective re-employment tools is the cornerstone of the NEres program and provides a key strategy to developing an available workforce for Nebraska. The offices of Unemployment Insurance (UI) and Employment and Training (E&T) collaborate extensively and continue to strengthen partnerships to provide employment services and reemployment assistance to Nebraskans impacted by job loss.

NEres Participants. NEres serves the following populations: (1) all initial non-exempt UI claimants; (2) Re-Employment Services and Eligibility Assessment (RESEA) profiled individuals; and (3) Voluntary Job Seekers wishing to participate.

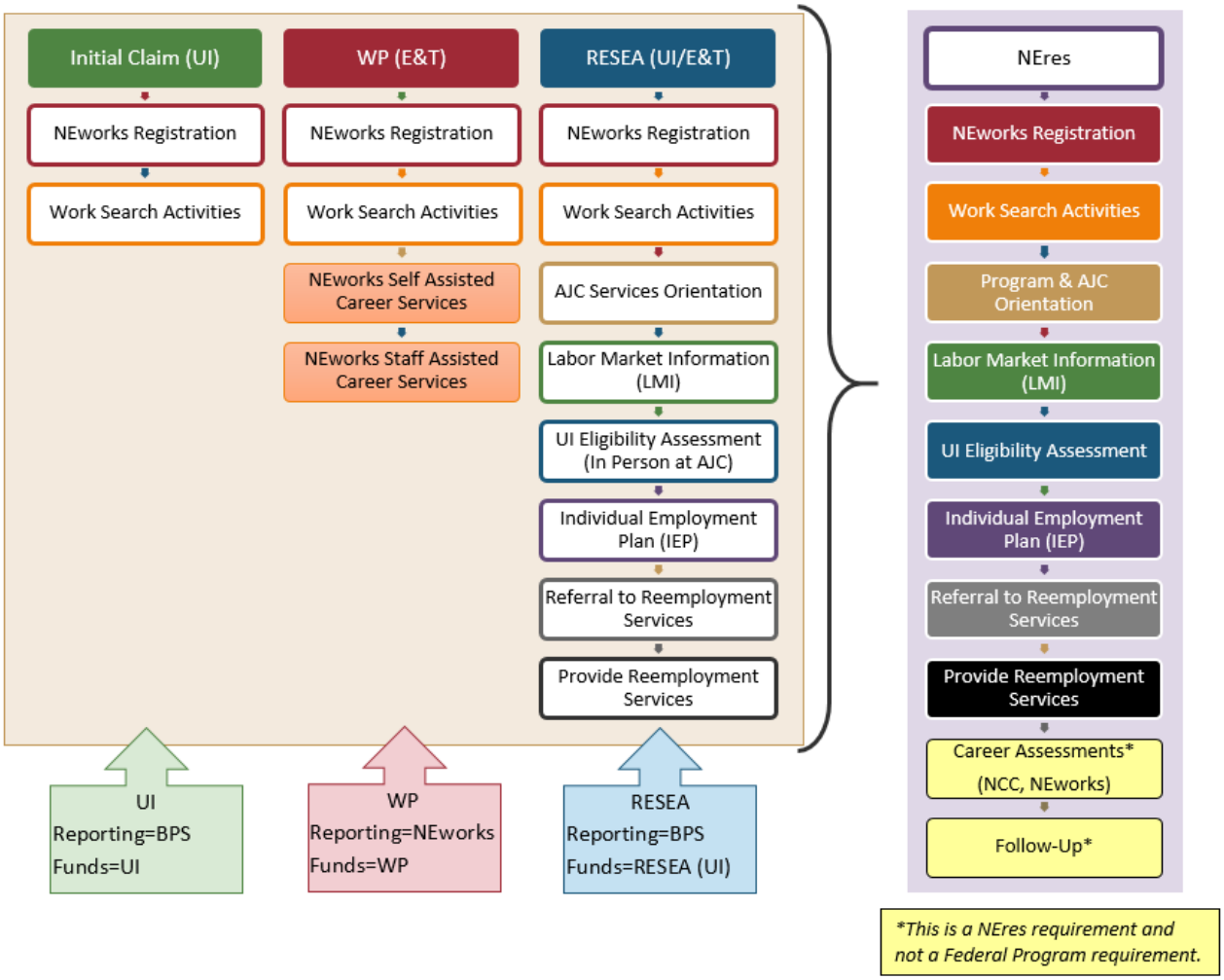
As a comprehensive re-employment program, NEres seeks to provide services to the individuals most in need of re-employment assistance. This includes individuals profiled through the UI system (RESEA), as well as all initial non-exempt UI claimants. Profiled individuals (RESEA) have been identified to be at risk of potentially exhausting their UI benefits. Initial UI claimants are at the beginning stage of re-entering the workforce and will benefit from early intervention and re-employment assistance. NEres is also available to voluntary job seekers choosing to participate in order to strengthen their job searching skills. All voluntary participants receive the same resources and services available to required NEres participants.

NEres participants are provided universal services intended to meet their individual re-employment needs. While serving individuals with an umbrella of services, NEres maintains the funding source and reporting integrity of each population served. NEres is able to do this based

on the Participant Service Model below. This service model shows the identification of each NEres participant through one of three avenues, based on their association with the targeted populations to be served. The model also shows that individuals will maintain their funding source identity for federal and state reporting requirements as well as individual program integrity and compliance.



Menu of Services. NEres combines the required services of the federally funded Re-Employment Services and Eligibility Assessment (RESEA) program, along with the job seeker requirements for regular Unemployment Insurance (UI) compensation. Based on the requirements for each specific program, NEres offers a set of universal services and meets the strictest program criteria of RESEA in order to ensure compliance with all federal and state program requirements. The graphic below illustrates the program services required by each separate program and their relation to the universal services provided via NEres.



Program Requirements. NEres has four services that comprise the criteria necessary to meet re-employment program requirements. These services are:

- Group Orientation
- 1-on-1 Visit
- Referral to Services
- Follow-Up

Each service of the NEres program has a defined set of criteria that are provided to assist the customer in meeting their re-employment needs and program requirements. The individual criteria that are part of each NEres service are indicated below.

Participant Compliance. The following populations are required to participate in NEres:

- All initial non-exempt UI claimants
- Re-Employment Services and Eligibility Assessment (RESEA) profiled individuals

Failure to comply with NEres program requirements may result in suspension of benefits until the NEres program requirements are met.

NEres also welcomes voluntary job seekers to participate in the program and receive resources to assist them in their job search to advance their employment or achieve re-employment. Voluntary job seekers are not mandated to participate and receive no sanctions for failure to comply with program requirements. Voluntary job seeker participants receive the same menu of NEres services and are included in federal reporting for the Wagner-Peyser program.

Benefitting Fund Sources. Per the NEres Service Model shown previously, NEres maintains each participant's association with the program that originally identified them as a part of the NEres program:

- Unemployment Insurance (UI)
- Re-Employment Services and Eligibility Assessment (RESEA)
- Wagner-Peyser (voluntary job seekers)

Individual program identity is necessary for data integrity and federal reporting purposes. The provision of universal services maximizes agency resources and eliminates duplication of services, while maintaining individual program integrity. NEworks, the state's reporting and case management information system, has the necessary capabilities to track individuals and their services, while maintaining their association with the appropriate and necessary reporting system.

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Reemployment Opportunities. NEres provide tools and resources for individuals to increase their re-employment options via successful job matching. Through NEres, quality job matches are initiated by:

- Work Search Activities
- Job Referrals
- Virtual Recruiter Notifications

These preliminary steps to a successful job match provide NEres participants the opportunity to explore viable employment options that match their Knowledge, Skills and Abilities (KSA). Employment opportunities that are refined and based on participant KSAs will lead to greater success in re-employment for individuals.

NEres Service Delivery and Locations. NEres staff are head-quartered at primary NEres locations across the state and facilitate the group workshop, one-on-one visit, referral to services and follow-up services in person or face-to-face via video conferencing. NEres service regions are based on Nebraska's previous regions for implementation of the Extended Services Program (ESP), which was utilized to assist with the administration of Extended Unemployment Compensation (EUC) benefits. The state is divided into six regions, each composed of various counties that revolve around primary service locations. Customers are directed to the appropriate NEres location based on their home county.

(d) Use of W-P funds to support UI claimants and the communication between W-P and UI

Wagner-Peyser funds support UI claimants through the regular and ongoing provision of Employment Services throughout the workforce system. Employment Services communicates with UI on a regular basis to discuss the provision and recording of reemployment services for UI customers and to assess current practices for opportunities for improvement. Communication between UI and Employment Services occurs via technology, phone, and in-person meetings. UI Supervisors and staff are included in Employment Services training, both as participants and trainers, in order to communicate necessary and relevant strategies for provision of reemployment services to shared customers.

(1) Coordination of and provision of labor exchange services for UI claimants

Nebraska Department of Labor has a contract with Geographic Solutions Inc. (GSI) for the NEworks Virtual One-Stop (VOS) module system used for Employment Services, including labor exchange services. In October 2013, NDOL purchased GSI's Re-Employment Exchange (REX) Module which allows a single sign-on for customers who utilize services through both the NEworks and Unemployment Insurance systems. In Jan 2014, NDOL transferred hosting services from the Nebraska Office of Chief Information Officer (OCIO) to GSI and added a Mobile Application module. In order to successfully implement the program design of NEres, NDOL purchased the Scheduler & Attendance Tracking Module from GSI, which:

1. Interfaces with the VOS, REX, Mobile App and Benefit Payment System (BPS).
2. Provides the functionality to schedule and track program participants per the correct fund source.

The software helps maintain eligibility of benefits for UI claimants not yet employed, by providing eligibility data to the UI system. This module also allows NEres to schedule and track unemployment claimants who are required to attend an orientation and one-on-one meeting at the beginning of their unemployment claim so as to get them back to work sooner. This technology will replace an outdated scheduling system.

In addition to NEworks, the state's integrated Management Information System (MIS), Employment Services utilizes additional forms of technology to disseminate information and communicate with customers, including UI claimants. Social media, virtual services and user friendly mobile applications allow customers to have 24/7 access to services and communication tools intended to support employment opportunities for individuals in Nebraska. These same tools allow program staff to follow-up and maintain contact with participants and ensure employment services, and reemployment services for UI claimants, are being utilized in an effective manner to promote and encourage re-employment and career opportunities that match the job seeker's Knowledge, Skills and Abilities (KSAs).

Employment Services supports UI customers in Job Search and Placement Assistance by providing significant staff assistance with the job search process; including, but not limited to, evaluation of customers' abilities, job search approach, advisement on alternative methods of job search techniques, and assistance with company and industry research. Additionally, Employment Services supplements application assistance by offering resume assistance, both 1-on-1 and via group workshops. Resume assistance provides job seekers with a quality resume that can accompany their employment applications. Cover letters and other employment related correspondence are also provided, and are tailored to the needs of each customer based on their employment goals and work experience.

NEworks offers customers a powerful and robust system to search for job openings. From quick job searches to advanced searches, NEworks features a host of options to view and apply for job openings across the state. The state's public labor exchange, provides job search and employment assistance opportunities that can be self-assisted (by the customer) or staff-assisted. The web based system means these services are available for customers to access directly 24/7, and at their convenience. The on-line labor exchange provides the opportunity and convenience for customers to look for employment opportunities that meet their needs. It also allows staff and employers to view job seeker resumes and work history, and create job referrals based on the candidate's abilities. A Virtual Recruiter offered through NEworks is another job matching tool that provides customers with direct information about employment opportunities that match their interests and abilities.

(2) Registration of UI claimants with the State's employment service if required by State law;

NEworks is used as the single sign-on system for Employment Services and UI customers. Employment Services staff work directly with UI customers in the American Job Centers or via phone to provide registration assistance on the NEworks system.

NEworks is a web-based system that can be accessed 24/7 anywhere internet connection is available. Computers available in the Resource Room in the American Job Centers provide direct customer access to NEworks, along with staff assistance if necessary. Employment Services staff have recognized that some customers are deficient in computer literacy skills. To assist customers in overcoming this barrier, Employment Services coordinates with local literacy groups, education institutions and Community Based Organizations (CBOs) to provide computer literacy assistance either in the local American Job Centers or at other locations in the community.

Employment Services also conducts NEworks Workshops to assist customers in registering for work and navigating the labor exchange system. Employment Services workshops include, but are not limited to:

- NEworks Registration
- Resumes Workshops
- Job Search Workshops
- Labor Market Information

(3) Administration of the work test work test for the State unemployment compensation system

Nebraska's Employment Services, One-Stop Centers and UI division collaborate to provide seamless reemployment services through the NEres program. The NEres program includes initial eligibility assessments as well as additional reemployment services. Each NEres customer receives a group orientation and then a subsequent individual appointment.

Within the individual appointment, the NEres staff conduct the following core activities:

- Eligibility Review (for UI claimants)
- Development of an Individual Employment Plan (IEP)
- Provision of Labor Market Information (LMI)
- Reemployment Services
- Referral to Training
- Job Search and Placement Assistance

Employment Services provides these direct services to UI customers, and coordinates with the UI program to outline expectations and needs related to eligibility assessments. Employment Services staff are trained by UI on Eligibility Issues and the communication process with UI to inform them of potential issues. Identified Eligibility Issues are documented and communicated with UI in a timely fashion, in order for UI to follow up accordingly.

(4) Provision of referrals to and application assistance for training and education programs and resources.

Employment Services conducts assessments of customers to determine their Knowledge, Skills and Abilities. Assessments may include an initial assessment, either formal or informal needs assessment based on first direct contact with the customer to determine their needs and appropriate services. It may also include an Interest/Aptitude and Skills Assessment which involves the administration of a formal assessment to measure the possession of, interested in or ability to acquire job skills of knowledge. Examples of Interest/Aptitude and Skills Assessments

include: Nebraska Career Connections; NEworks Skills Analyzer; O*NET Online; My Next Move; Career One-Stop; My Skills My Future; CASAS; etc.

Based on customer conversations, interviews and assessments, Employment Services staff make the appropriate referral to training and education programs that may assist the customer with necessary upskills in order to be competitive in their reemployment journey. Referral to training and education programs is based on customer need and circumstances. These referrals are documented in NEworks in order to track progress of partnership development and use of community resources. Employment Services staff also provide assistance if additional it is needed by the customer to complete reference or application materials. These situations occur on a case by case basis, and are prompted by the customer.

Sharing of training and education program information and materials is a key strategy in order for Employment Services to make appropriate referrals for customers. Employment Services staff communicate with their education partners to determine current program opportunities and possible requirements of customers in order to participate. This information allows referrals to be based on information that directly affects and benefits the customer.

(e) Agricultural Outreach Plan (AOP)

(1) Assessment of Need

Agriculture data from prior and current program years continue to be the foundation of this program plan to provide Wagner-Peyser funded services and activities to the agricultural community under the One-Stop Delivery System. Other key sources of information are the Nebraska Agriculture Statistical Services (NASS), United States Department of Agriculture (USDA) and Proteus Inc. (Proteus). Proteus is the WIA 167 National Farmworker Jobs Program grantee.

Nebraska has six major crops, which employ seasonal and migrant agricultural workers. These crops include sugar beets, edible dry beans, potatoes, sorghum, and apples. In previous years, soybeans were included on this list but changes in planting techniques and weed control have virtually eliminated the need for migrant and seasonal farm workers. Row planting of the soy bean crop has been replaced by the drilling method of planting which provides closer spacing of the plants and makes the application of chemicals to control weeds more effective thereby reducing the need for hand weeding and hoeing efforts. The most recent data on Nebraska crops is found in the NASS "2010 State Agricultural Overview" for Nebraska.

(A) 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.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(B) An assessment of the unique needs of farmworkers means summarizing 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.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(2) Outreach Activities

(A) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

Employment Services data mines information in NEworks to identify MSFW individual and pro-actively reach out to them to offer and promote permanent employment opportunities. Employment Services also partners with the Nebraska's federal contractor for the MSFW program to provide information and conduct workshops for their MSFW customers.

Employment Services coordinates with the state's Meat Packing Bill of Rights Coordinator to leverage travel time and outreach efforts to target communities shared by both MSFW and meat packing populations. The partnership involves community discussions, provision of resource materials, and outreach efforts with faith-based organization and other Community Based Organizations (CBOs) that serve or may come in contact with MSFW populations.

Other outreach efforts include, but are not limited to

- Identifying community organizations that may come into contact with MSFW's:
  - Churches with Spanish mass
  - Migrant Head Start
  - Libraries
  - Community Based Organizations
  - Service Agencies
  - Proteus
  - Legal Aid
- Identifying businesses that may come into contact with MSFW's: Hispanic grocery stores, laundromats, restaurants, motels, salons etc.

(B) Providing technical assistance to outreach workers. 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 complaint system, 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.

WP seeks to contact 100 migrant and seasonal farmworkers each program year to provide Employment Services.

(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.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(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.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(E) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The number of farmworkers who will be contacted each program year by other agencies under cooperative arrangements. These numerical goals must be based on the number of farmworkers estimated to be in the State in the coming year, taking into account the varying concentration of farmworkers during the seasons in each geographic area, the range of services needed in each area and the number of W-P and/or cooperating agency staff who will conduct outreach.

There are 7 regions of the state, and an assigned Employment Service staff person is located in each region to conduct outreach, promote Employment Services and actively recruitment MSFW customers. An additional MSFW outreach staff person is located in the Virtual Services Unit to provide data mining assistance to identify MSFW customers in NEworks. The Meat Packing Bill of Rights Coordinator also provides Employment Services outreach assistance. There are a total of 9 MSFW outreach staff for Employment Services in Nebraska.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be further developed.

(3) The State's Strategy for

(A) Coordinating outreach efforts with WIOA Title 1 section 167 grantees as well as with public and private community service agencies and MSFW groups.

The Monitor Advocate oversees the Wagner-Peyser program outreach to agricultural employers and migrant and seasonal farm workers. The State's Monitor Advocate (SMA) position is currently held in NDOL's Office of General Counsel. The Monitor Advocate coordinates responsibilities with the H2A Coordinator in NDOL's Foreign Labor Certification (FLC) program, and this coordination will remain critical as the state continues to transition to the new H2A rule that re-engineers the process by which employers obtain an H2A labor certification. The change from an attestation-based application process to one requiring more investigations and findings by the SWA has warranted enhanced outreach and referral services to migrant workers through the Interstate

Clearance System. Migrant seasonal farm workers outreach activities are primarily coordinated through Nebraska's One-Stop Delivery System. The manager of each local One-Stop Career Center has been assigned the responsibility to conduct outreach to employers and to migrant and seasonal farm workers in their surrounding areas of service.

The SMA will partner with the H2A Coordinator to provide training, as needed, to One-Stop Career Center staff on activities such as Housing Inspections and the Employment Services (ES) Complaint System, in order to improve delivery of services to the migrant population. The SMA's duties include the conducting of annual field visits to significant One-Stop Career Centers in the state, and reporting any findings resulting from those visits. Concentrated outreach is undertaken, as our increasingly constricted annual budget permits, during the peak periods of migrant and seasonal farm workers' activity, traditionally April through June. The One-Stop Career Center outreach workers, in coordination with Proteus Inc., the WIA 167 National Farmworker Jobs Program grantee, maintain a record of daily outreach activities that includes the names of individuals. These records are especially utilized when an application is taken, referral to a job is made, or a complaint is documented. This data is retained and preserved through the NEworks data system. This data system allows the Agency to track the number of migrant and seasonal agricultural workers contacted, any follow-up contacts that are made, and the types of services provided. This information is provided to USDOL's Employment and Training Administration (ETA) in the quarterly "Services to Migrant and Seasonal Farmworker Reports" (Form 5148, LEARS Reporting System).

Outreach efforts will include an explanation of the full menu of services available from the local One-Stop Career Center as well as specific employment opportunities that are currently available. Outreach also involves the provision of information on the ES Complaint System and a summary of farm worker rights with respect to employment. Outreach workers encourage migrant and seasonal farm workers to go to the nearest One-Stop Career Center to receive required services. If the migrant and seasonal farm workers cannot or do not wish to access services at the Center, the outreach worker provides onsite aid in the preparation of applications, assistance in obtaining referral to specific employment opportunities, guidance in the preparation of complaints, referral to supportive services, and help in making appointments and arranging transportation. In all instances where appropriate, bilingual staff is available to conduct outreach activities.

To assist in outreach, NDOL has developed a brochure showing the services that are available and other services that are most needed by migrant and seasonal farm workers. The brochure has been produced in Spanish and English. A web page on the MSFW program has also been developed in Spanish and English on the Official Nebraska Government Website at www.dol.nebraska.gov, (click on "Safety & Labor Standards" and "Migrant/Seasonal Farmworkers"). The brochure and the web page will continue to be important resources, both for direct outreach and for connecting to other agencies within or without the One-Stop Career Center area involved in serving the migrant and seasonal population through outreach activities. The three most important resource partners for migrant and seasonal farm workers in Nebraska are the Department of Education migrant program, the migrant health programs, and Proteus

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Inc., which is the State's Workforce Investment Act Section 167 agency. Coordination among these partners will continue to be of special importance to the Wagner-Peyser funded programs. Under the One-Stop Delivery system, the effective working relationship between Wagner-Peyser programs and Proteus has been formalized in the written Memoranda of Understanding. The cooperation implicit in this MOU applies not only to the full-service One-Stop Career Centers, but to the affiliate centers and access points as well. There is no Wagner-Peyser funding level per se set-aside for the proposed outreach activities. However, all outreach activities conducted will be paid for by Wagner-Peyser funds.

(B) Explaining to farmworkers the services available at the local one-stop centers.

Outreach efforts will include an explanation of the full menu of services available from the local One-Stop Career Center as well as specific employment opportunities that are currently available. Outreach also involves the provision of information on the ES Complaint System and a summary of farm worker rights with respect to employment. Outreach workers encourage migrant and seasonal farm workers to go to the nearest One-Stop Career Center to receive required services. If the migrant and seasonal farm workers cannot or do not wish to access services at the Center, the outreach worker provides onsite aid in the preparation of applications, assistance in obtaining referral to specific employment opportunities, guidance in the preparation of complaints, referral to supportive services, and help in making appointments and arranging transportation. In all instances where appropriate, bilingual staff is available to conduct outreach activities.

NDOL will promote its full menu of services to agricultural employers through the use of handouts distributed by the migrant and seasonal farm worker outreach staff to both employers and workers. Outreach to agricultural employers is part of the daily responsibilities of every One-Stop Career Center manager. Local radio programs are used to air agricultural job openings. Employers may use the web-based, integrated system of NEworks to post their job openings, either through employer-direct entry or through any One-Stop Career Center or Department of Labor office. NDOL offers employers and job seekers NEworks (www.neworks.nebraska.gov), which is made available to state workforce agencies to list job openings on a nationwide basis. The H2A Coordinator follows the directives issued by the Chicago National Processing Center (for labor certification) in clearing H2A job orders in neighboring states and labor supply states, in coordination with the State Monitor Advocate.

(C) Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

The SMA will partner with the H2A Coordinator to provide training, as needed, to One-Stop Career Center staff on activities such as Housing Inspections and the Employment Services (ES) Complaint System, in order to improve delivery of services to the migrant population. The SMA's duties include the conducting of annual field visits to significant One-Stop Career Centers in the state, and reporting any findings resulting from those visits. Concentrated outreach is undertaken, as our increasingly constricted annual budget permits, during the peak periods of migrant and seasonal farm worker activity, traditionally April through June. The One-Stop Career Center outreach workers, in coordination with Proteus Inc., the WIA 167 National Farmworker

Jobs Program grantee, maintain a record of daily outreach activities that includes the names of individuals. These records are especially utilized when an application is taken, referral to a job is made, or a complaint is documented. This data is retained and preserved through the NEworks data system. This data system allows the Agency to track the number of migrant and seasonal agricultural workers contacted, any follow-up contacts that are made, and the types of services provided. This information is provided to USDOL's Employment and Training Administration (ETA) in the quarterly "Services to Migrant and Seasonal Farmworker Reports" (Form 5148, LEARS Reporting System)…

Outreach efforts will include an explanation of the full menu of services available from the local One-Stop Career Center as well as specific employment opportunities that are currently available. Outreach also involves the provision of information on the ES Complaint System.

(C) Providing farm workers with a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Outreach also involves the provision of information on the ES Complaint System and a summary of farm worker rights with respect to employment.

(D) Urging those farm workers who have been reached through the State's outreach efforts to go to the local one-stop center to obtain the full range of employment and training services.

Outreach workers encourage migrant and seasonal farm workers to go to the nearest One-Stop Career Center to receive required services.

(4) Services Provided to Farmworkers and Agricultural Employers through the One-Stop delivery System.

Describe the activities planned for providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system.

NDOL will promote its full menu of services to agricultural employers through the use of handouts distributed by the migrant and seasonal farm worker outreach staff to both employers and workers. Outreach to agricultural employers is part of the daily responsibilities of every One-Stop Career Center manager. Local radio programs are used to air agricultural job openings. Employers may use the web-based, integrated system of NEworks to post their job openings, either through employer-direct entry or through any One-Stop Career Center or Department of Labor office. NDOL offers employers and job seekers NEworks (www.neworks.nebraska.gov), which is made available to state workforce agencies to list job openings on a nationwide basis. The H2A Coordinator follows the directives issued by the Chicago National Processing Center (for labor certification) in clearing H2A job orders in neighboring states and labor supply states, in coordination with the State Monitor Advocate.

(5) Other Requirements

(A) State Monitor Advocate. The plan must contain a statement that indicates that the State Monitor Advocate has been afforded the opportunity to review and approve the AOP.

SMA prepares monthly and annual reports required by USDOL, including 5148 LEARS report, agricultural services plans, agricultural outreach plans.

(B) Review and Public Comment. The plan must provide information indicating that WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other appropriate farmworker groups, public agencies, agricultural employer organizations and other interested employer organizations, have been given an opportunity to comment on the State AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

(C) 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.

Nebraska anticipates further guidance from the U.S. Department of Labor. Once this guidance is received and processed by the core programs, this section will be completed.

Wagner-Peyser Assurances

The State Plan must include assurances that:	
1.	The Wagner-Peyser 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));
2.	The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;
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 services, Adult and Dislocated Worker programs and Youth Programs under Title I; and
4.	State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations.

Adult Education and Family Literacy Act Programs

(a) Aligning of Content Standards.

Nebraska Adult Education will adopt the College and Career Ready Standards approved by the Nebraska State Board of Education. The Language Arts Standards were approved on September 5, 2014 and the Math Standards were approved on September 4, 2015. By July 1, 2016, Nebraska

Adult Education staff will review the Nebraska Department of Education approved standards in order to align the standards with the curriculum available/to be created for instruction of adults.

Adult Education programs will be required to utilize these standards in their respective programs in order to prepare students for post-secondary education and/or employment. Professional development will be provided to ensure that all Adult Education staff are adequately prepared for instruction of the College and Career Ready Standards; this will be a multi-year project.

(b) Local Activities.

The Nebraska Adult Education program serves eligible individuals identified in WIOA, Section 203(4) as an individual-

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

Instruction includes: Basic Skills/Foundation Skills instruction; English Language instruction; Career Pathways; Work Readiness Skills; Academic Skills leading to a high school equivalency diploma; entry into post-secondary education/training and/or employment; and may include all of the following: Math, Reading, Writing, Science, Social Studies, Language Arts, Civics, Integrated Education and Training (IET), digital literacy, and other eligible categories of instruction enumerated in Section 203 of WIOA.

A committee made up of Adult Education practitioners has been formed to develop a framework for Adult Education instructors to address Work Readiness skills as well as College and Career Readiness (CCR) skills. Both a resource guide and professional development training covering these broad areas will be conducted statewide in the spring of 2016 so that AE programs are ready to incorporate in the program's offerings on July 1, 2016.

As defined in Section 203(5) of WIOA, the term "eligible provider" means an organization that has demonstrated effectiveness in providing adult education and literacy activities that may include—

(1) a local educational agency;
(2) a community-based organization or faith-based organization;
(3) a volunteer literacy organization;
(4) an institution of higher education;
(5) a public or private nonprofit agency;
(6) a library;
(7) a public housing authority;

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(8) a nonprofit institution that is not described in any of subparagraphs (A) through (G) and has the ability to provide adult education and literacy activities to eligible individuals;
(9) a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in any of subparagraphs (A) through (H); and
(10) a partnership between an employer and an entity described in any of subparagraphs (A) through (I).

The local application process will include applicable information required/needed by Nebraska Adult Education and the items enumerated in Section 232 (Local Application) of WIOA, which states that each eligible provider desiring a grant or contract from an eligible agency shall submit an application to the eligible agency containing such information, as enumerated in Section 232 of WIOA, and assurances as the eligible agency may require, including:

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

Section 231(c) requires that each eligible agency receiving funds under this title shall ensure that all eligible providers have direct and equitable access to apply for grants or contracts under this section; and the same grant or contract announcement process and application process is used for all eligible providers in the State or outlying area.

The Nebraska Department of Education ensures that all eligible providers have direct and equitable access to apply for grants under the Adult Education and Family Literacy Act (Title II) of the Workforce Investment and Opportunity Act. The same grant announcement and application process is used for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of evaluators and state Adult Education staff.

The considerations for funding will follow Section 231(e) of WIOA; other considerations identified in the local plan under section *108 (Local plan not available until July 1, 2017)* as determined by

the regional Workforce Boards; and other considerations as determined by Nebraska Adult Education in accomplishing the intent of WIOA.

Multi-year grants will be awarded to eligible agencies on a competitive base.

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 not individuals described in subparagraphs (A) and (B) of Section 203 (4), except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy services. In providing family literacy services 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 (Section 231 (d) of the Workforce Innovation and Opportunity Act).

In Nebraska, programs providing family literacy services, Adult Education funds can be used only for those activities offered specifically for the adult parent(s) who are eligible for Adult Education services. Other sources of funding will be required to fund activities involving children.

(c) Corrections Education and other Education of Institutionalized Individuals.

The Nebraska Department of Education, pursuant to the Act, shall use not less than 82.5 percent of the grant funds to award grants and contracts under Section 231 and to carry out Section 225, of which not more than 20 percent of such amount shall be available to carry out Section 225.

Adult education and literacy activities are provided at **both** the local and state levels of corrections Adult Education classes.

All other academic programs listed below are provided **only** at the state correctional facilities and are funded with other state and/or federal funding:

- Special education, as determined by the eligible agency
- Secondary school credit
- Integrated Education and Training (IET)
- Career pathways
- Concurrent enrollment
- Peer tutoring
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism

The policies, procedures, and activities for providing instructional services to this clientele are the same as those for regular programs of instruction for adults. In addition, programs will be encouraged to use guidance and supportive services where possible and to provide education and training through cooperative efforts with providers in correctional and other institutionalized settings. The same application and review processes will be used for Section 225 as are used for Section 231 applicants.

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(d) Integrated English Literacy and Civics Education Program

The United States Department of Education will be issuing further guidance on new statutory requirements that apply to the Integrated English Literacy and Civics Education program under WIOA throughout program year 2015.

Upon final federal guidance, all students in the Integrated English Literacy and Civics Education Programs may be (1) co-enrolled in other workforce system programs or (2) receive services concurrently from several partners.

The Nebraska Department of Education will offer a competitive RFP process designed specifically for Integrated English Literacy and Civics. Funding under this title will be awarded based upon the criteria for evaluation of programs' applications contained in Section 231(e) of WIOA and other criteria determined through state applications for Nebraska Adult Education.

The Nebraska Department of Education recognizes the importance of integrating English Literacy and Civics education services, including workplace development, with other agencies and institutions within the State. Collaborative efforts will be made with such agencies as Department of Labor, Vocational Rehabilitation (VR), Nebraska Commission for the Blind and Visually Impaired (NCBVI), Department of Health and Human Services (DHHS), and other partnering agencies. Local programs will use guidance from the Nebraska Department of Education, Workforce Development Boards, and local advisory committees and in close association with other training providers, to establish and operate an Integrated English Literacy and Civics education program. This cooperation leads to program improvements through which to better serve students.

Other partnerships come from agency and business/industry representatives serving on local advisory committees and program administrators taking an active role by participating on other agency committees. In addition, local program representatives are appointed to the regional Workforce Development Boards. These efforts will increase collaboration, raise awareness, and educate business and industry leaders about the benefits of workplace literacy, English Literacy, and Civics education.

To carry out English Literacy and Civics instruction, eligible agencies will collaborate where possible, and avoid duplication of efforts in order to maximize the impact of the activities.

As a strong supportive partner in the American Job Center, Adult Education will provide basic skills instruction and specific workplace readiness skills. This will enable the target population to obtain the skills necessary for successful employment. It is anticipated that, where feasible, Adult Education will provide on-site instruction and/or referral services. All of these activities help to build strong local programs that benefit the lives of students.

Nebraska Adult Education is committed to the development and implementation of programs and services through new and promising assessment tools and strategies that are based on scientifically valid research, identification of barriers and needs, and capturing the gains of such

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students. Adult English language learners will have the support necessary to achieve competence in Reading, Writing, Math, speaking, digital literacy, comprehension of the English language, and Career Pathways.

Further guidance will assist the state in finalizing the procedures and goals necessary to fulfill the program requirements. Anticipated additional funding sources of the training component include: Nebraska Department of Labor, other WIOA partners, government and public agencies, and/or the business community.

(e) State Leadership

State Leadership funds are essential as new and required initiatives are implemented under WIOA. State Leadership activities will be carried out to develop or enhance the services that Adult Education and other WIOA core partners provide to eligible participants in the program. Various committees will be formed to address both the required and permissible activities needed to fulfill the requisites of Section 223 of WIOA. A maximum of 12.5% of the federal Adult Education monies will be utilized for State Leadership activities.

Required Activities

1. Career Pathways

In anticipation of the formulation of the WIOA state plan, a committee of personnel from the local Nebraska Adult Education programs was formed to develop the plan for meeting Career Pathways and College and Career Readiness (CCR) objectives. Research is currently being conducted on the wide range of Career Pathways resources that are available, including the Nebraska Career Connections website that is available to all Nebraskans, including adults. Nebraska Career Connections was developed as a joint effort of Nebraska Career and Technical Education (CTE) and the Nebraska Department of Labor.

The Career Pathways and CCR plan for Nebraska includes three phases: training, implementation, and full transition. Statewide training of all program staff will include redefining initial contact with students and developing an orientation to address a career pathway system for each student. When implemented, instructors will engage students to determine the level of need and they will collaboratively design a training plan that may include any, some, or all of the three training areas of employability skills, career readiness and college readiness.

During transition, Adult Education programs will be directed to core partners through the American Job Center delivery system, utilizing job search and additional training programs offered through the Department of Labor administered programs. Upon determination of additional barriers, other partner programs such as Vocational Rehabilitation and Department of Health and Human Services will be consulted to provide support service training(s).

2. Professional Development Programs

To accomplish the required objectives of Section 223 of WIOA, Nebraska Adult Education proposes to establish a committee to assist the State Office in the development and implementation of the State Leadership portion of the Four-Year Combined State Plan.

The Professional Development Committee will study and recommend specific trainings to be offered during the state plan period. Staff from the core partner programs will be invited to attend and participate in various trainings that are offered to Adult Education teachers and staff. Areas to be included, but are not limited to, are: reading instruction, needs of adult learners, training and use of volunteers in Adult Education, and dissemination of best practices and models of learning, and other professional development activities as needed or requested.

3. Technical Assistance

The part-time nature of the Nebraska program will require technical assistance for all levels of staff on a continuous basis.

As needed, technical assistance to eligible providers and WIOA partners will include, but not be limited to:

- The development and dissemination of instructional and programmatic practices in reading, writing, speaking, mathematics, English language acquisition, digital literacy, distance education, and staff development;
- The role of eligible providers as a one-stop partner to provide access to training, employment, and education; and
- Assistance in the use of technology including staff development programs.

In Nebraska, a survey of both students and staff will be conducted within the first year of this plan in order to assess both needs and competencies of the students and of the staff who serve in the program. Specific trainings will be determined after the surveys have been conducted. Training will be provided in a variety of formats; such as webinars, on-line classes, and face-to-face.

4. Monitoring and Evaluation of Programs

The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities is essential to program improvement and attainment of the performance standards that are determined for the individual programs and for the state-wide WIOA program.

The monitoring and evaluation documents will be revised to address the goals of WIOA, and in particular, for the Adult Education program and its newly required activities in relation to the core partners. In addition, the dissemination of information about models and proven or promising practices within the State and from other states, will take place.

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Permissible Activities

With the exclusion of the regional resource centers, the following permissible activities are envisioned to be components of the trainings provided to Nebraska's Adult Education staff. Many of these will be incorporated into the required state leadership activities that are offered throughout the year; invitations to the trainings will be made to WIOA partners.

1. **Support of technology and distance education applications** (Nebraska Adult Education is presently reviewing additional distance education resources and will conduct a survey of staff and students in the area of technology.)
2. **Develop and disseminate curriculum including reading** (Nebraska Adult Education is presently in the second year of a mentoring project, emphasizing the four components of reading in assisting students to become college and career ready.)
3. **Develop content and models for Career Pathways** (In development in Nebraska)
4. **Provide assistance to eligible providers in developing programs to measure progress under this title** (Update needed in Nebraska.)
5. **Develop or implement a system to assist in transition from Adult Education to postsecondary education or employment** (In progress in Nebraska)
6. **Develop activities to promote workplace adult education**
7. **Identify and disseminate curriculum frameworks for adult education**
8. **Develop and pilot strategies for improving teacher quality**
9. **Develop strategies to meet the needs of adult learners with learning disabilities**
10. **Develop strategies of outreach to instructors, students and employers**
11. **Establish collaboration between eligible agencies** (In progress)

(f) Assessing Quality

The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities is essential to program improvement and the attainment of the performance standards which are determined annually for the core programs and for the state-wide WIOA program.

The monitoring and evaluation documents will be revised to address the goals of WIOA, and in particular, for the Adult Education program and its newly required activities in relation to the core partners. In addition, the dissemination of information about models and proven/promising practices within the State and from other states will take place.

The primary emphasis of evaluation will be to assess the effectiveness at both the state and local level, in achieving continuous improvement of Adult Education and literacy activities, teacher quality, and overall program performance. Data will be both quantitative and qualitative to evaluate the progress and continuous improvement of program activities.

Nebraska's Adult Information Management System (AIMS) meets Federal reporting requirements for data reporting. Through this data tool, the quality performance of local programs will be assessed on the core performance levels required for WIOA partners and the

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additional assessment of academics established by the Office of Career Technical and Adult Education. Further, the data in AIMS will be utilized to analyze local and state performance, determine the cause of areas of weakness, and develop strategies for improvement in the coming year. Professional development and technical assistance activities will be coordinated to ensure training and support for program improvements correlate with the program needs. Programs that fail to improve will develop a program improvement and plan could see a reduction in future funding.

The State Office holds regular meetings with the Adult Education program directors. This includes monthly conference calls and biannual face-to-face director meetings for local program administrators to share challenges as well as successes. These meetings serve as an opportunity to share new policies, best practices, and network with Adult Education colleagues.

Teacher Effectiveness:

Within the next two years, the Nebraska Adult Education program will devise a checklist for evaluating the effectiveness of teachers in the local programs. This will include instruments for goal setting and professional development plans. The teacher effectiveness evaluation will be rooted in best practices and current research, such as that developed by OCTAE and the American Institutes for Research; it includes a set of teacher competencies, toolkits of technical assistance resources, and teacher induction models to assist efforts to retain, support, and develop highly effective adult educators.

Local programs will be expected to meet requirements set forth by OCTAE; the State Adult Education Office; and as enumerated in their program proposal, grant award document, and assurances and certifications. Meeting performance standards and timely submission of student data, claims, and reports, along with desk audits, monitoring visits, and program evaluations are essential to the quality of an Adult Education program and the staff.

If a local Adult Education program is out of compliance, a Corrective Action Plan (CAP) will be developed. For low-performing programs, a Program Improvement Plan (PIP) will be initiated.

To assist in achieving maximum performance by all staff in all parts of the Adult Education program, regular and continuing professional development is essential. In addition, the Indicators of Program Quality will be updated and implemented.

Adult Education and Family Literacy Act Program Certifications and Assurances

States must provide written and signed certifications that:	
1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may carry out each provision of the plan;

4.	All provisions of the plan are consistent with State law;
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;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
The State Plan must include assurances that:	
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 supplement and not supplant provisions);
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;
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;
4.	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;
5.	The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and
6.	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.

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Nebraska Vocational Rehabilitation

(a) State Rehabilitation Council All agencies, except those agencies that are independent consumer-controlled commissions, must describe the following:

(1) Input provided by the State Rehabilitation

The State Rehabilitation Council (SRC) is made up of individuals from across the state who have an interest in working with Nebraska VR to ensure that the needs of Nebraskans who experience a disability are being met in the most effective and efficient manner possible. Council members review, analyze and advise Nebraska VR regarding the agency's performance. They also help develop, agree to, and review the agency's goals and priorities. The SRC developed the following mission statement: "The State Rehabilitation Council recommends and advises Nebraska VR for the purpose of ensuring quality employment services for Nebraskans with disabilities." This report covers SRC meetings and recommendations from October 2013 through September 2015.

The Council is composed of 3 subcommittees: Client Services, Employment and Transition. Each SRC member selects a subcommittee to participate in based on their interests and background. These committees provide the Council members the opportunity to focus and provide feedback on topics relevant to their individual group.

- The **Client Services Committee** provided feedback on client satisfaction surveys, services to VR clients and recommended cultural awareness training and technical assistance on materials and outreach strategies directed toward Nebraskans who are deaf and hard of hearing and the Latino populations. The Client Services Committee formed the subcommittee, Consumer Input Committee, as another avenue to gather feedback and recommendations. The Consumer Input Committee consists of past and present clients of Nebraska VR. This year the Consumer Input Committee reviewed: 1) Discover the Job that Works for You booklet section Individualized Plan for Employment (IPE) Important Information for You, 2) Application: section Understanding Your Rights as an Applicant, 3) Marketing: Magnet Promotional Item Survey and Nebraska VR bus advertisements, and 4) MyVR Survey.
- The **Employment Committee** selected the Entrepreneur of Distinction Annual Award winners, discussed and provided feedback on VR job placement services, job seeking training, Certificate Programs and Project Search.
- The **Transition Committee** focused on policies and procedures relating to high school aged clients and families including discussions on pre-employment transition services as defined in WIOA.

The following summarizes the State Rehabilitation Council's input, recommendations and collaborations with Nebraska VR. The agency agreed with all the recommendations and will take or has taken necessary action to implement.

SRC Input The VR Director provided information on the Workforce Innovation and Opportunity Act (WIOA) and the State Plan process. The SRC discussed and provided input on the long-term vision and goals of the State Plan. The SRC was in support of the comments developed and submitted by Nebraska VR on the WIOA draft regulations.

SRC members provided input on many issues including: educating the public about VR, marketing materials and brochures, and internal and external agency websites, VR's internal data dashboard that displays information on client expenditures, placement by primary occupation, plans, eligibilities and outcomes by individual counselors, teams, and statewide. The VR and SRC websites were updated and redesigned to be compatible with mobile devices and compliant with Section 508.

The SRC provided input on client engagement initiatives, i.e., MyVR, an on-line application to enhance communication with clients, a tool to increase client engagement by providing greater access to their VR counselor and their case information. In addition, the SRC reviewed and supported the 30-day client contact standard which is the minimum amount of time that a client should be contacted.

The SRC unanimously supported the continuation of FedEx days and the creative ideas that are generated by VR staff. FedEx days was enacted several years ago to provide VR staff the opportunity to share and create ideas to improve Nebraska VR. FedEx days provides time for VR employees to work on problem solving for the agency, i.e., the Lincoln VR Office purposed and eventually developed a tool to assist with job placement giving staff the ability to search their caseloads by employment goal when working with employers.

SRC Recommendations:

- The SRC supported VR's efforts to improve engagement of individuals in the VR Process through the Meet You Were You Are initiative, a rapid engagement model, and stressed the importance of using surveys to gauge how Nebraska VR is meeting client needs. Therefore, client satisfaction surveys were revised to get more detail as to why jobs ended.
- The SRC provided feedback and supported combining the VR Adult and Transition workbooks that explore client interests, assets, work history and employment needs used to develop the Individualized Plan for Employment. The SRC recommended adding Benefit Analysis to the booklet.
- The SRC provided feedback and suggestions to make the VR Transition pamphlets more user-friendly language by eliminating VR terminology.
- The SRC suggested that VR explore opportunities to increase the number of Native Americans with disabilities being served. With the only Vocational Rehabilitation Services Project for American Indians with Disabilities in Nebraska in Nebraska no longer funded, VR will approach other eligible tribes and organizations to apply for AIVR grants.

SRC Annual Events

Entrepreneur of Distinction Awards: The SRC selected and recognized Nebraska VR clients who were successful in their self-employment ventures. The SRC held the award ceremony during October to coincide with Disability Awareness Month and the quarterly SRC meeting. This

allowed more SRC members to also attend the ceremony. The Nebraska Commissioner of Education recognized the following Entrepreneur of Distinction award winners:

- Charlene Potter of Rosewood Environmental Art in Omaha is an artist who paints and sculpts.
- Lee Krumm of Midwest Auto Salvage in Lincoln salvages auto parts.
- Dan Hromus of Prairie Pride Poultry in York provides healthy, farm fresh eggs to consumers.

The Alumni Entrepreneur of Distinction Award winners recognizes previous winners who have successfully maintained their business for at least 3 years:

- Jessica Goeden of Healthy Paws in Norfolk has a pet-grooming business.
- Nathan Chandler of 40 Nights Photography in Lincoln is a photojournalist.

VR Awareness Activity for Legislators: SRC Member Brad Meurrens, Disability Rights Nebraska, provided training to the SRC on strategies and techniques to educate State Legislators on employment and vocational rehabilitation services. The SRC members put what they learned into immediate action when visiting State Senators or aides.

(b) Request for Waiver of Statewideness

(1) the local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request. (2) the designated State unit will approve each proposed service before it is put into effect; and (3) requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable. Nebraska VR is not requesting a Waiver of Statewideness.

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Investment System

(1) Federal, state, and local agencies and programs; (2) State Programs carried out under the section 4 of the Assistive Technology Act of 1998; (3) Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture; (4) Non-educational agencies serving out-of-school youth, and (5) State use contracting programs.

Nebraska VR seeks to work cooperatively with numerous other state and local agencies and programs. Collaborative efforts are manifested through coordinated committees throughout the state with Nebraska VR state office and local field staff actively participating. Examples of the committees Nebraska VR serves on includes, but are not limited to, Nebraska Planning Council on Developmental Disabilities, State Advisory Council on Mental Health Services, Nebraska Special Education Advisory Council Standing Committees on 1) Autism Spectrum Disorders, 2) Out of Home Placements (OHP), 3) Transition, 4) Deaf and Hard of Hearing, 5) Nebraska Youth Leadership Council, Nebraska Brain Injury Advisory Council, Local Community Resource Committees, Madonna Community Advisory Council, Assistive Technology Partnership (ATP) Advisory Council, Alternative Finance Loan Advisory Council, Nebraska Children's Commission

Juvenile Services Committee, Protection and Advocacy for Individuals with Mental Illness Advisory Council, Prevention Partnership with the Nebraska Children and Families Foundation, and local Chambers of Commerce, etc.

Nebraska VR maintains interagency agreements with Nebraska Health and Human Services, Nebraska Commission for the Blind and Visually Impaired, and the Veterans Administration–Vocational Rehabilitation and Employment Program for purposes of providing an understood and coordinated effort to achieve employment goals for persons with disabilities.

Nebraska VR maintains written agreements with the following programs to coordinate efforts and services to assist persons with disabilities to achieve employment success. These following agencies represent various locations throughout the state and serve individuals experiencing a variety of disabilities such as severe and persistent mental illness, developmental disability, brain injury, learning disability, autism spectrum disorders, and those experiencing multiple disabilities.

Liberty Centre Services Employment Program, Cirrus House, Inc., Goodwill Industries of Greater Nebraska, Goodwill of the Great Plains, Vocational Development Center Inc., Community Options Individual and Family Services, Mental Health Association of Nebraska, Community Alliance Rehabilitation Services, Mosaic, Douglas County Correctional Services, Developmental Services of Nebraska, Vital Services, Employment Works, Inc., Region V Services, Resources for Human Development, Inc. Integrated Life Choices, Eastern Nebraska Community Office of Retardation, Rainbow Center, Turley Employment Services, Ability Building Services, Easter Seals Nebraska, Abilities Fund, North Star Services, North Platte Opportunity Center, Black Hills Workshop and Training Center, Ollie Webb Center, Inc. and The Autism Center of Nebraska.

Project Search agreements are maintained with these business and high schools:

Businesses: Cabela's, Walmart Distribution Center, Embassy Suites Downtown Omaha, Embassy Suites La Vista and Embassy Suites Lincoln, PayPal, Valmont Industries, Faith Regional Hospital, St. Francis Hospital, Mercy Medical Center, Mary Lanning Health Care, St. Elizabeth's Hospital, Children's Hospital, Columbus Community Hospital, Monroe Meyer Institute, Nebraska Medicine, York Health Care and Good Samaritan Hospital.

Schools: Bellevue Public School, Columbus Public Schools, Kearney Public Schools, Lincoln Public Schools, Madonna School, Millard Public Schools, Norfolk Public Schools, North Platte Public Schools, Omaha Nations Public Schools, Omaha Public Schools, Papillion LaVista School District, Westside Community Schools, Winnebago Public Schools, Norris Public Schools, Waverly Public Schools, York Public Schools and Educational Service Units 1, 2, 6, 7 & 9.

To maximize limited resources and assist individuals to access other programs which can provide needed services essential to individuals achieving employment, Nebraska VR works cooperatively with and utilizes numerous services and facilities within the state. These services and facilities

include Centers for Independent Living, the Parent Information and Training Center, Apprenticeship Program, schools, Educational Service Units and employers.

Nebraska VR provides a grant to the Assistive Technology Partnership (ATP) to offer rehabilitation technology assessment, assistive technology use services, rehabilitation engineering and rehabilitation technology repair services to clients throughout the VR process. ATP and VR have established policies and procedures for these services. ATP staff are co-located in most of the Nebraska VR field offices.

Nebraska VR contracts with Easter Seals Nebraska for benefits analysis, post successful employment outcome follow-up, and conducts our client satisfaction survey.

Nebraska VR works cooperatively with and utilizes Rural Economic Area Partnerships, and other programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture, when these programs and resources are available to local communities for economic development, and to the extent such cooperation and utilization is permissible under the Rehabilitation Act, as amended.

With respect to non-educational agencies serving out-of-school youth many of the programs listed above serve this population.

The State of Nebraska does not have a state use contracting program.

(d) Coordination with Education Officials

(1) The designated state unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for timely development and approval of an individualized plan for the students. (2) Information on the formal interagency agreement with the state educational agency with respect to: 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; transition planning by personnel of the designated state agency and educational agency that facilitates the development and implementation of their individualized education programs; roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; procedures for outreach to and identification of students with disabilities who need transition services.

Coordination with Nebraska Department of Education-Special Education, Nebraska Department of Education

The Office of Special Education, under the Nebraska Department of the Education, is responsible for the provision of a free and appropriate public education. Nebraska VR is the adult service agency responsible for providing vocational rehabilitation services. There is a current interagency

agreement to facilitate the transition of students receiving special education services which will be revised when final regulations are issued.

The pending revised agreement will address the following —

- Consultation and technical assistance to assist local educational agencies and Educational Service Units in planning for Pre-Employment Transition Services and the transition of students with disabilities from school to post-school activities, including employment, post-secondary education, vocational rehabilitation services, or services from an appropriate adult service agency.
- Support for transition planning by personnel of Nebraska VR, local school districts and Educational Service Units to facilitate the provision of Pre-Employment Transition Services and the development and completion of Individualized Educational Plans.
- Procedures for enhancing outreach to and identification of students with disabilities in need of transition services, including those students with disabilities who qualify for assistance under §504 of the Rehabilitation Act, but not a free appropriate public education under the Individuals with Disabilities Education Act.

Nebraska VR serves on the Nebraska Department of Education's Special Education Advisory Council Committees on 1) Autism Spectrum Disorders, 2) Out of Home Placements (OHP) Committee, 3) Transition, 4) Deaf and Hard of Hearing, 5) Youth Leadership Council. These committees meet throughout the year to share information, identify issues, and coordinate secondary education and transition services for students with disabilities.

Nebraska VR and the Nebraska Department of Education-Special Education co-funds a Youth Leadership Facilitator and a Nebraska Youth Leadership Council.

Serving on the statewide Nebraska Youth Leadership Council provides an opportunity for youth with disabilities to develop leadership skills and promote self-advocacy. The Council works with youth and organizations across the state to promote the Council's goals and activities and the maintenance of regional councils. There are five regional councils across the state and each council meets four times throughout the year and all councils come together for a statewide meeting in the summer. Council members reach out to students and youth with disabilities as well as to community members to highlight and promote awareness of disability rights issues.

Nebraska VR provides financial support and consultation for five regional Transition Youth Conferences for students, aged 16-21, hosted at local community college sites. The conferences focus on employment, postsecondary educational opportunities, self-advocacy, utilizing community supports, and assistive technology. The students are exposed to a variety of interactive and informative discussions and activities to prepare for learning, working, and navigating as a young adult in the real world.

In an interagency collaborative effort, Nebraska VR partnered with Department of Education-Special Education, ESUs, Disability Service Offices at Institutes for Higher Education, and PTI

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Nebraska to participate in a Capacity Building Institute hosted by the National Secondary Transition Technical Assistance Center. Work has continued at a local level to develop a tool, which will help professionals, parents and students answer critical questions about the coordination of services and access to resources surrounding the five core PETS activities.

Nebraska VR is providing financial support to the Department of Education - Career Education to provide training to guidance counselors and special education staff regarding the Career Pathway Advancement Project (CPAP) grant. The Career Education office will educate high school staff regarding the training and employment opportunities for students when referred to Nebraska VR Career Pathway Recruiters. Local school staff will also be made aware of the grant by VR staff that work with transition students within the high schools. This will encourage referrals to Nebraska VR for students interested in career pathway advancement.

The Assistive Technology Partnership/Education receives funding from Nebraska VR for the AT Education Specialists to focus on transition youth and coordinate services with Nebraska VR offices. The Education Specialists host technology conferences, participate in self-advocacy workshops, provide AT demonstrations and individualized services and AT recommendations to transition youth across the state.

Coordination with local school districts and Education Service Units

As a result of Nebraska's strong tradition of local control, over 250 local school districts offer secondary education. Most districts are small, enrolling fewer than 100 secondary students, and having less than 10 students with disabilities. Nebraska VR has a two-prong directed outreach effort to secondary school districts:

- Outreach and identification efforts directed to special education, vocational education, guidance counseling, school nursing, and school personnel having knowledge of students with disabilities, including those not receiving special education services.
- Transition partnership planning occurs with schools, Educational Service Units, and VR at the local level. This planning promotes a coordinated effort between the local school, ESU, and the local VR Office. The planning process identifies the nature and scope of services the local VR Office will provide in coordination with the efforts of the school and/or ESU. The process addresses the schedule of events and activities, expected outcomes, and a process to evaluate the effectiveness of the partnership. Nebraska VR will develop local interagency agreements with school districts and Educational Service Units to address the coordination of the provision of Pre-Employment Transition Services (PETS) to students with disabilities and the joint responsibilities of each agency in providing and paying for PETS and transition services.
- Nebraska VR supports 17 Project SEARCH sites across the state. Consistent with the national model, Project SEARCH is a partnership between Nebraska VR, a business, area school systems, the Commission for the Blind and Visually Impaired, Assistive Technology Partnership, and Division of Developmental Disabilities. The one-year school-to-work program is business led and takes place entirely in the workplace. The experience includes a combination of classroom instruction, career exploration, and hands-on training through

worksite rotations. While completing the rotations, the students have the opportunity to gain transferable skills, practice self-advocacy and demonstrate work readiness. Nebraska's Project SEARCH programs are hosted in a variety of businesses including hotels, hospitals, retail and distribution.

(e) Cooperative Agreements with Private Nonprofit Organizations

Nebraska VR has written procedures for establishing written agreements with service providers, including private nonprofit vocational rehabilitation service providers. These procedures emphasize the role of local VR offices in identifying needs for specific vocational rehabilitation services responsive to the needs of persons with significant disabilities in their areas. They also emphasize the role of local VR and community rehabilitation staff in monitoring the agreements, including usage and effectiveness of services.

Background screening is required for all individual providers with written agreements who provide job coaching, independent living skills exploration and training, supported employment, and self-employment consultation. Providers who employ individuals who deliver services requiring background screening must furnish written assurances that those employees have not been convicted of a felony or misdemeanor involving neglect and/or abuse of a child or vulnerable adult before the written agreement is approved.

Currently, Nebraska VR does not have any formal Cooperative Agreements that utilize state and local dollars for matching federal funds.

(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

On the state level, Nebraska VR works collaboratively with the Nebraska Department of Health and Human Services Divisions of Developmental Disabilities Services and Behavioral Health Services to coordinate the system of service delivery for supported employment services. While the funding models for supported employment services in these two systems are different, both models contain performance-based provisions.

The Health and Human Services Division of Developmental Disabilities has expanded supported employment opportunities through its Community Supports Program (CSP). This program option allows clients and their families to hire private individuals, not associated with any agency, to serve as a job coach to help the individual achieve a supported employment outcome. Nebraska VR developed policies to support this effort and to financially participate in this innovative supported employment option.

The Autism Center of Nebraska has successfully provided supported employment and job coaching for individuals with Autism Spectrum Disorders under a performance-based contract. The Autism Center self-funds extended services.

At the local level**,** Nebraska VR enters into written agreements for the provision of supported employment services with financial assistance provided by Nebraska VR. These agreements are

used with public or private non-profit community rehabilitation programs and private for-profit entities providing supported employment services. Nebraska VR maintains written procedures for entering into these agreements.

Each agreement describes the time-limited services that will be provided to eligible persons with the most significant disabilities using funds from Nebraska VR prior to the transition to extended services.

Cooperating organizations must assure the availability of the minimum extended services of (1) twice monthly monitoring at the work site of each individual to assess job stability and (2) based on that assessment, coordination or provision of specific services needed to maintain job stability. If off-site monitoring is determined to be appropriate, then each month, there must be two contacts with the employed person and, if the person has disclosed their impairment to their employer, one contact with the employer each month. These mandatory extended monitoring services apply to all agreements.

(g) Coordination with Employers

(1) VR services

In Nebraska, coordination with employers is essential to creating competitive integrated employment and exploration opportunities. In an effort to increase the partnerships Nebraska VR has with employers, the following activities have been implemented:

"Meet You Where You Are" Model

Nebraska VR has engaged in a dual customer approach to the provision of employment-related services for many years as embodied in its mission statement, "We help people with disabilities prepare for, obtain, and maintain employment while helping businesses recruit, train, and retain employees with disabilities." This has led to a job-driven approach in Nebraska VR's development of customized training programs such as Project SEARCH, Certificate Programs, and On the Job Evaluation and Training sites. Nebraska VR recently extended the job-driven emphasis with the implementation of a "Meet You Where You Are" model that includes a rapid engagement (Progressive Employment) focus engaging individuals in an element of work as quickly as possible. VR staff are actively involved in the recruitment and support of businesses to partner with VR on rapid engagement activities.

Business Account Managers and Placement Specialists

Nebraska VR created three new positions during the spring of 2015. The primary responsibility of these new Business Account Managers (BAMs) is fostering relationships with current and prospective business partners. As the BAMs meet with employers, the focus is not only on current hiring needs but also on exploration of opportunities that may eventually lead a client to employment. These coordinated exploration opportunities include but are not limited to: On the Job Evaluation (OJE), mock interviews, and company tours. Over time, Nebraska VR will consider increasing the number of BAMs available in the state.

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Nebraska VR Placement Specialists are available across the state to assist individuals with disabilities find and keep jobs. The Placement Specialists work with clients and businesses to ensure appropriate supports are available for job seeking and job retention.
Placement Specialists and BAMs enter business information into an electronic Employer Contact application. This application is accessible to all Nebraska VR staff. It not only provides the agency with "business memory," it also allows Nebraska VR to track employer contacts and the variety of career exploration activities each business is willing to complete.

Nebraska VR's Talent Bank is another resource available to staff. The Talent Bank can graphically display aggregate information from the case management system by client job goal. This allows teams to strategically target employers by sectors in response to the number of job goals presented.

As the BAMs and Placement Specialists are meeting with employers, anecdotal labor market information is gathered. Employers are sharing current hiring needs with VR staff. The use of anecdotal and real time labor market information is an important component of Nebraska VR's work to support businesses.

Career Pathway Advancement Project
Nebraska VR is a recent recipient of a Career Pathway grant. The Career Pathway Advancement Project represents the next evolution of vocational rehabilitation by proactively improving the likelihood of economic self-sufficiency for individuals with disabilities, including youth with disabilities. The project will build off of existing Department of Labor career pathways initiatives in Information Technology, Manufacturing, Transportation, Distribution and Logistics. It will expand partnerships with other agencies including Easter Seals Nebraska, Assistive Technology Partnership, Nebraska Department of Education (NDE) Career Education and the Institute for Community Inclusion. Ultimately the project will allow VR eligible individuals over the course of the project to access career pathway partnerships with businesses and educational institutions. A proven Upskill/Backfill business model will be used to create opportunities for former VR eligible individuals to advance their careers and open up new opportunities for other VR eligible individuals.

Customized Employment
Impending changes in Section 511 of WIOA and Nebraska's experience in working with individuals with significant disabilities, lead to the conclusion that an emphasis on Customized Employment can increase the opportunities for successful employment and expanded partnerships with employers. In order for Nebraska VR to be successful in the implementation of Customized Employment services for individuals with significant disabilities, Nebraska is receiving intensive technical assistance and training from the Institute for Community Inclusion (ICI) in the following areas: 1) strategies to increase employer awareness and acceptance of a Customized Employment approach and 2)

training to VR staff at all levels to develop the necessary skills, knowledge and buy-in to the Customized Employment approach and to work with businesses to negotiate customized employment opportunities.

ADA and Section 503 Training

There are a variety of opportunities available for Nebraska VR to present ADA and Section 503 information to businesses. Nebraska VR maintains membership with fourteen Chambers of Commerce across the state. VR staff have presented at ADA conferences and hosted National Disability Employment Awareness Month forums.

NET and TAP

Nebraska's Program Director for Employment Services is a National Employment Team (NET) contact. Nebraska's NET contact receives timely information about national job openings and partnerships and participates in face-to-face business meetings. Nebraska VR staff receive information/training specific to the Talent Acquisition Portal (TAP) and its benefits are shared with businesses.

(2) Transition services, including pre-employment transition services, for students and youth with disabilities

Work Based Learning Experiences

Many of the activities highlighted under (1) VR Services also enhance Nebraska VR's transition services, including pre-employment transition services. For example, as the Business Account Managers are working with employers, opportunities for students and youth are also explored. These work-based learning opportunities may include informational interviews, job shadows, company tours, On-the-Job Evaluation and Training, internships, and placement assistance.

Certificate Programs

For the past several years, Nebraska VR has developed and maintained Certificate Programs. These Certificate Programs provide hands-on training for students and youth with disabilities (adult VR clients may also enroll). The specialized training results from a partnership with local Nebraska VR service offices, three to five core business partners in the area, a community college and local schools. Students take classes, tour businesses and either work part-time or participate in an internship with employer partners. The programs are business-driven, short term, real life trainings that teach both technical hard skills and work readiness skills. Each training opportunity gives the students an opportunity to acquire the skills that they need to pursue in-demand jobs and careers. To date, the Certificate Programs offered include: Electrician Helper, Welding, Auto Mechanic Helper, Construction, HVAC Helper, Para-educator, and Community Health Worker. Nebraska VR will explore increasing the number of Certificate Programs available in the state.

Project SEARCH and Business Advisory Councils

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There are currently 17 Project SEARCH sites in Nebraska. Consistent with the national model, Project SEARCH is a partnership between Nebraska VR, a business, area school systems, the Commission for the Blind and Visually Impaired, Assistive Technology Partnership, and Division of Developmental Disabilities. The one-year school-to-work program is business led and takes place entirely in the workplace. The experience includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. While completing the rotations, the students have the opportunity to gain transferable skills, practice self-advocacy, and demonstrate work readiness. Nebraska's Project SEARCH programs are hosted in a variety of businesses including hotels, hospitals, retail and distribution.

There are currently two Project SEARCH Business Advisory Councils (BAC) in Nebraska. The goal of the BAC is to broaden the program across a variety of industries, provide individuals with disabilities access to the resources they need to be successfully employed in a wide-range of fields and serve as a platform to further educate business professionals about the benefits of employing individuals with disabilities. The measurable goal is 100% employment of Project SEARCH intern participants. Between the two Nebraska BACs there are more than thirty businesses involved. Nebraska VR will consider increasing the number of Project SEARCH sites available in the state and will also consider the expansion of BACs.

(h) Interagency Cooperation

(1) the State Medicaid plan under title XIX of the Social Security Act

Attachment 4.16-A of the State of Nebraska State Plan Under Title XIX of the Social Security Act defines the relationship between the state health and vocational rehabilitation agencies and grantees under Title V of the Social Security Act and their respective functions. The attachment addresses reciprocal referrals, liaison staff, confidentiality of information, funding and limitations, exchange of service reports and reviews.

(2) the State agency responsible for providing services for individuals with developmental disabilities

Nebraska VR (VR) and the Nebraska Health and Human Services (DHHS), Division of Developmental Disabilities (DD) continue to co-fund milestone outcome payments for individuals with intellectual disabilities. VR maintains Service Agreements with DD approved community-based service providers.

VR and DD have not had an opportunity to meet and begin planning on the respective sections of WIOA that related to competitive integrated employment and competitive-integrated supported employment for individuals with intellectual disabilities. This delay is the result of a change in the Nebraska governorship, changes in the Nebraska Department of Health and Human Services agency directorship and division directors particularly with DD which has yet to select a permanent director. An initial conversation with the DHHS Director found a willingness to work with VR on the WIOA related initiatives and in particular, services to individuals with intellectual disabilities prior to age 21.

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(3) the State agency responsible for providing mental health services

Health and Human Services, Division of Behavioral Health Services (DBH) have developed a Memorandum of Understanding to provide braided funding for an outcome-based milestone system of supported employment for individuals with significant behavioral health disabilities. The negotiating team consisted of the Directors of VR and DBH along with their respective Program Managers and Fiscal Administrators. The tools used to arrive at the model included: reviews of the fidelity models, a signed agreement for sharing information on mutual clients, VR contract costs and the payments to supported employment providers from the six Behavioral Health Regions who receive their funding from the Division of Behavioral Health.

During this negotiating period, internal VR case reviews were performed on clients receiving supported employment services and program reviews were performed on the supported employment providers to assess the types of services being performed and their effectiveness. After consulting with other states including Maryland, Missouri, Kansas, Oklahoma and Indiana on milestone payment systems a braided funding system was developed. VR pays for three of the four milestones and DBH pays for one of the four milestones and all of the long-term supports. The implementation process included a pilot program to track the flow of payments, training for both VR staff and for providers. The Division of Behavioral Health instituted a "Supported Employment Payment Protocol Manual — Milestones and Payment for Services". VR changed its Program Manual to reflect all of the changes. The new payment system was implemented starting October 1, 2014.

Regular communication is the key to keeping the model moving forward. VR case reviews and supported employment provider program reviews were conducted again during the summer of 2015. A report was written and overall recommendations were made for program improvement. DBH conducts fiscal audits and provider reviews.

VR teams have a designated liaison meeting at least monthly with the supported employment providers. The VR Program Manager and VR Office Directors meet quarterly with the supported employment providers.

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

(1) Data System on Personnel and Personnel Development

Nebraska VR (VR) maintains a system for collecting and analyzing data on qualified personnel needs which includes: the number of personnel currently employed by VR by personnel category, the number of positions currently available to VR by personnel category, and projections of the number of personnel who will be needed in 5 years by personnel category. The table summarizes this information for direct service personnel as of September 30, 2015:

Direct Service Personnel Employees

	Rehab Specialists	Service Specialists	Associates

Direct Service Personnel Employed	51.68	52.8	38.375
Personnel to Client Ratio after IPE	1:131	1:129	1:177
Personnel to Clients Ratio All Clients	1:185	1:217	1:296
Projected Staffing Requirements *(All vacancies filled)*	54.68	61.8	39.938
Current Vacancies	3	9	1.563
Projected Replacement Needs (5-year total)	40	35	20

Non-Direct Service Personnel Employees

	Senior Administrator	Program Directors Office Directors	Information Technology	Program Specialists Admin. Specialists Admin. Associates	Office Associates
Non-Direct Service Personnel Employed	1	22	7	9.6	1.13
Projected Staffing Requirements	1	2	9	10	1.13
Current Vacancies	0	0	2	0	0
Project Replacements (5-year total)	0	3	2	1	.565

There are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act to prepare vocational rehabilitation professionals in the disciplines designated in the Act.

With the proposed changes in CSPD requirements and hiring Bachelor's with paid and unpaid disability-related experience and Masters in other disability-related disciplines, requesting enrollment statistics from Nebraska postsecondary institutions' current bachelor and master's candidates in a number of disability and business/employment related disciplines is neither feasible nor helpful. Consequently, there is no personnel development data system on potential graduates.

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel

There is a projected need to replace an average of 19-24 VR service delivery staff annually due to resignations and retirements over the next 5 years. With the passage of the Workforce Innovation and Opportunity Act and pending final regulations, it is difficult to predict the impact on personnel levels. The dual customer focus of serving both individuals with a disability and

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employers along with a heightened emphasis on providing pre-employment transition services to students with a disability and serving youth with a disability may have an impact on how staff are deployed, staffing levels, or a combination of both.

Recruitment and Preparation

The ability of Nebraska VR to recruit qualified specialists continues to be impaired by the absence of:

(1) a federal traineeship support for a long-term rehabilitation training program in Nebraska,
(2) the inadequate regional supply of qualified applicants with an obligation to the public vocational rehabilitation program, and
(3) pending changes to 361.18 (c) (1) (ii) in the Act may somewhat change Nebraska VR's strategy for recruiting personnel having a 21st century understanding of the evolving labor force and needs of individuals with disabilities.

As previously stated, there are no institutions of higher education in Nebraska receiving funds under the Rehabilitation Act to prepare vocational rehabilitation professionals in the disciplines designated in the Act; however, Nebraska VR has had staff enrolled in programs located in other states.

Emporia State University attended one day of the FY2015 Nebraska VR State Training Conference to recruit Nebraska VR employees to the RC48 Online Master's Program. As a result, 7 employees enrolled in their program. Other staff have attended rehabilitation related programs with Drake University.

Nebraska Department of Education and Nebraska VR policy provide options to VR staff to request time or financial assistance for post-secondary education. Nebraska VR has provided non-paid internships to graduate and undergraduate students. Our most recent internship was Spring 2015 to a University of Wisconsin-Stout graduate student who was hired upon completion of the internship.

Qualified rehabilitation and service specialists are actively recruited from the Nebraska higher education institutions listed below as well as rehabilitation education programs located primarily in the Midwest. The agency supplements the distribution of Rehabilitation and Service Specialists' vacancy postings by the State Personnel Office by sending announcements directly to the following counseling programs.

In Nebraska, there are two programs accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). They are the University of Nebraska at Kearney and the University of Nebraska at Omaha. Both programs offer an M.A. in Community Counseling.

University of Nebraska at Kearney – Community Counseling
University of Nebraska at Omaha – Community Counseling and School Counseling

There are 6 institutions of higher education, accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools that offer an M.A. in Counseling, Clinical Counseling, or Community Counseling. Because these are generic counseling programs, the agency must conduct a transcript analysis to determine which applicants meet the Professional Counseling certification criteria.

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- University of Nebraska Lincoln
- Creighton University
- Bellevue University
- Chadron State College
- Doane College
- Wayne State College

The following are rehabilitation education programs in adjacent and other Midwest states that the agency sends specialist vacancy announcements.

Master's Rehabilitation Programs

- Adler School of Professional Psychology
- Drake University
- East Central University
- Emporia State University
- Langston University
- Maryville University of St. Louis
- Minnesota State University, Mankato
- St. Cloud State University
- University of Illinois Urbana
- The University of Iowa
- University of Northern Colorado
- University of North Dakota
- University of Wisconsin – Stout

Undergraduate Rehabilitation Programs

- East Central University
- Emporia State University
- Southern Illinois University - Carbondale
- University of North Dakota
- University of Wisconsin – Stout

The agency annually participates in the Fall and Spring Career Fairs at the University of Nebraska Lincoln (UNL). This career fair, while held at UNL, is attended by students from most of the colleges in Nebraska. In addition, the agency also participates in Nebraska small college career fairs.

There is active recruitment of qualified personnel with disabilities and those from racial and ethnic minority. Our vacancy postings are listed with the Nebraska Latino-American Commission, the Ponca Tribe of Nebraska, the Urban League of Nebraska, the Nebraska State Independent Living Council, five Nebraska Centers for Independent Living and the Center for Independent Living in Council Bluffs, Iowa. In addition, an increased salary differential is offered to individuals who are bilingual or fluent in Spanish or American Sign Language (ASL). The agency currently has 16 minority staff. While we do have a number of staff with a reported or observed disability, we do not officially collect this information.

Retention

The Director conducts video conversations with all new staff during the first month, fifth month (6-month probationary positions), and in the seventh month on the job (1 year probationary positions). The video conversations are an opportunity to:

- become acquainted with each new staff member and his/her background,
- provide an opportunity for a new staff member to ask questions and provide feedback,
- assess how a new staff member is progressing in his/her training,
- determine if a new staff member is finding his/her job to be what they expected and is consistent with how the job was presented, and
- demonstrate the agency's interest in his/her success.

The Director offers an opportunity to staff for face-to-face, one-on-one interviews. This is an

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opportunity for all staff to provide personal feedback on specific policies and procedures and to discuss their role on their team and in the agency. In addition, staff have an opportunity to anonymously post questions about policy, rumors, or any concern a staff member has to the Director on an internal website.

Nebraska VR offers staff flexible work schedule options which include, but are not limited to a 4-day workweek (10 hour workdays) and compressed workweek (four 9 hour workdays and one 4-hour workday). In some cases, the agency has approved a staff person moving to a part-time schedule. This option provides a measure of autonomy to staff in balancing work and family.

On-line exit interviews are offered to staff exiting the agency. The goal of the interview is to assess why people leave, look for trends, and to learn if there was anything the agency could have done to retain them.

(3) Personnel Standards

Nebraska VR employs staff in 13 self-directed teams throughout the state to provide direct services and supports including financial assistance to help pay for the cost of services that are responsive to the unique needs and circumstances of each person with significant disabilities served.

During FY 2003, Nebraska VR implemented the new "VR Service Specialist" personnel classification. This position was created as the result of a Nebraska Department of Education position classification study based on job analyses of current job incumbents. The study found that the direct service work performed by Nebraska VR staff fell into three distinct classes of personnel instead of the two that existed. It was recommended that VR create a VR Service Specialist position classification located between the VR Associates and VR Rehabilitation Specialists positions comprised of job duties taken from the other two classifications.

VR Associate and VR Senior positions

VR Associates provide direct support to teams serving persons with disabilities seeking employment. Their responsibilities include: monitoring persons with disabilities engaged in agreed on vocational rehabilitation plans, arranging and coordinating team activities, arranging and coordinating transportation, maintaining individual service record, and arranging financial assistance necessary to obtain agreed on goods and services from community providers.

Associate academic degree standards

There are no national or state approved or state-recognized standards applicable to the associate position. The highest entry-level academic degree required for comparable work in State Personnel requirements is the high school diploma. All currently employed associates meet or exceed this standard.

VR Service Specialist and VR Senior Service Specialist positions

VR Service Specialists provide direct support to persons with disabilities seeking employment. Their responsibilities include: conducting orientation to Social Security benefits and benefits

analysis, providing personal management training, social skills training, job placement assistance, job seeking skills training and other instruction of persons with disabilities using standardized curricula and instructional methods, and providing information about the purpose, nature, and scope of vocational rehabilitation services to persons with disabilities, service providers, and the general public.

VR Service Specialist academic degree standards

There are no national or state approved or state-recognized standards applicable to the VR Service Specialist. The highest entry-level academic degree required for comparable work in State Personnel requirements is the baccalaureate degree. All currently employed VR Service Specialists meet this standard.

VR Rehabilitation Specialist and VR Senior Rehabilitation Specialist positions

VR Rehabilitation Specialists make determinations and provide specialized direct services to persons with disabilities pursuing employment goals. Their responsibilities include: eligibility, Individualized Plan for Employment (IPE) and amendment approval, IPE progress, and employment outcome determinations, community assessment, career counseling, disability awareness counseling, personal adjustment counseling, rehabilitation engineering, independent living skill training, personal management training, social skills training, job placement assistance, and job retention assistance. These activities generally require independent complex decision-making and problem-solving based on extensive knowledge of disability, human behavior, the world of work, and the community.

To comply with the previous CSPD requirements prior to WIOA, Nebraska VR elected in 1983 to use the coursework requirements for a Nebraska Certified Professional Counselor under the Nebraska Uniform Credentials Act. (Neb. Rev. Stat. §38-2132). Note that while Nebraska VR uses these academic coursework criteria for hiring, the certification applies only to individuals providing mental health counseling and who identify themselves as a Certified Professional Counselors. Nebraska VR neither requires staff to obtain the credential nor holds its staff out to be Certified Professional Counselors.

Once final regulations are issued around the CSPD standards, Nebraska VR intends to work with the Nebraska Department of Education Human Resources Office to combine the current two VR Rehabilitation Specialist classifications with the two VR Service Specialist classifications to create a four-step classification career ladder for VR Rehabilitation Specialists. The subsequent classifications are expected to be VR Rehabilitation Specialist I, II, III, and IV. Newly hired Specialists would enter the classification career ladder step commensurate with meeting the minimum education and experience requirements for either VR Rehabilitation Specialist I (BA) or VR Rehabilitation Specialist III (MA) and then progress up the career ladder based on time in grade, academic degree attainment and satisfactory performance. This career ladder has the potential of being a retention strategy to address a common comment on exit interviews on the lack of upward mobility within the agency.

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21st Century Understanding of the Evolving Labor Force

A 21st century understanding of the evolving labor force begins with an awareness that the workforce will continue to grow and reflect the increasing diversity of America. While increasing numbers of individuals with disabilities will be entering the labor force, such individuals currently remain a largely untapped labor source. Women's employment rates will rise while the employment rates for men will decline slightly. The percentage of individuals from minority groups entering the workforce will also grow.

The workforce will become increasing urban and the manufacturing sector will slowly decline while the service-producing sector will grow as will e-commerce. Technology and globalization will continue to shape the labor force and require a workforce with highly technical skills. How quickly graduate rehabilitation programs will revise curriculum to prepare graduates in a 21st understanding of the evolving labor force remains to be seen. Consequently, Nebraska VR must provide staff with timely training on Nebraska labor market information and trends, career pathways, the world of work and career connections in order to equipping VR staff with the knowledge to counsel individuals with disabilities in their pursuit of work and career and provide effective employment services. The outreach and partnership efforts of our Business Account Managers with Nebraska businesses will be also be critical to understanding their respective labor needs in order for VR to prepare, train and offer skilled applicants with disabilities.

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(4) Staff Development

Each team assesses the current knowledge, skill, and ability of the team and its members, and identifies the personnel development activities necessary to enable the team and its members to achieve their strategic and performance goals. These team level assessments are analyzed and integrated with a) statewide training needs identified by Program Directors in their specialty area, b) training needed to implement new innovative services, and c) needs indicated by objective program performance measures. The following summarizes significant staff development needs identified from these assessments.

Analysis of the assessments indicates the need for a long-term staff development strategy. In the absence of a long-term strategy, staff development becomes a series of one-time responses to immediate needs. A Program Director has been designated with the responsibility to work with the VR Leadership Council in the development of a long-term strategy.

For staff development purposes, the organizational knowledge and skill base is made up of the three major domains: Disabilities, Service Delivery Processes and Team Services. These domains are critical knowledge and skills shared by all team members. To effectively communicate among themselves, team members must possess knowledge of client disabilities and the way in which these impact the client, employment, and the provision of services. Every team member of the organization must understand the VR provided team services and possess knowledge of the service delivery system.

Organizational Knowledge and Skill Domains and Sub-domains

Disabilities (team-based):

- Spinal cord disorders
- Psychosis
- Anxiety & personality disorders
- Autism Spectrum Disorders
- Alcohol & Drug
- Musculoskeletal
- Cognitive disabilities
- Endocrine & immune system disorders
- Central nervous system
- Circulatory & respiratory
- Amputations
- Hearing impairments
- Acquired Brain Injury
- Learning Disabilities
- Intellectual Disabilities

Service Delivery Processes:

- VR Implementation Process
- Motivational Interviewing
- QE2 Training

Team Services:

- Assessment/Vocational Evaluation
- Benefits Orientation
- Counseling
- Placement
- Rehabilitation technology
- Independent living

Personnel development needs

1. **New staff training.** There is an anticipated need for Nebraska VR to replace an average of 19-24 staff annually due to resignations and retirements over the next 5 years. Until recently this turnover has primarily occurred among direct line staff. For the last three years, the agency experienced significant turnover among its administrative and management staff due to retirement. New hires through growth are a possibility given the emphasis of Title IV to serve businesses and to increase level of services to youth and students with a disability.

Nebraska does not have a Council on Rehabilitation Education (CORE) accredited, Rehabilitation Services Administration (RSA) assisted, graduate level rehabilitation education program preparing persons for practice in a rehabilitation discipline of counseling, evaluation or administration. In-migration of qualified personnel to fill vacant positions averages only about 1-2 per year. Consequently, newly hired VR Rehabilitation Specialists, VR Service Specialists, and VR Associates must be provided with intensive initial post-hire training to assure they possess critical performance related vocational rehabilitation knowledge and skills.

LINK is the State of Nebraska's online Human Capital Management program that will assist the state with Sourcing and Recruiting, Learning and Development, Employee Performance Management, On-Boarding & Benefits Enrollment, Succession Planning and Compensation Management. The component supporting Learning and Development will be the Employment Development Center (EDC). EDC is an employee's "one-stop shop" for learning, employee performance management, and employee and employer succession planning. The State of Nebraska continues to make enhancements to LINK and Nebraska VR continues to explore ways to best utilize this system.

The agency continues to explore different ways of utilizing videoconferencing, podcasts, or streaming videos as a way to deliver timely training to new staff. Using media technology would allow the training to be accessed when most relevant to each new staff member. On-line training through Elsevier, Inc. is being implemented to support training new and existing staff on career planning, working with employers, and job placement activities.

2. **Training in team services.** There is a need for on-going training to enhance the ability of VR Rehabilitation Specialists, VR Service Specialists, and VR Associates to provide direct services and supports. Staff turnover also requires training new staff to provide the quality team services expected by the program.

Specific types of team services provided directly by our staff include: community-based assessment, career counseling, vocational evaluation, disability awareness counseling, personal adjustment counseling, independent living skill training, personal management training, social skills training, job placement assistance, and job retention assistance. Also included are: Social Security benefits orientation, job seeking skills training and other instruction of persons with disabilities, monitoring persons with disabilities engaged in agreed on rehabilitation plans, providing information, arranging, coordinating, and scheduling team activities, arranging, coordinating, scheduling, and providing transportation, developing, preparing, and maintaining individual service records, and arranging financial assistance to procure agreed on goods and

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services. Motivational interviewing training has been provided to current staff. New staff will receive the same training. This training is expected to enhance the staff's delivery of team services.

3. **Individual training.** Probationary and annual performance reviews include identifying individual training and development needs. Staff request to attend training not provided or sponsored by Nebraska VR will be approved based on what was identified in their performance review.

4. **Technology use training.** Training needs assessments show a broad and diverse range of training needs related to integrating technology into everyday service delivery in order to improve productivity, efficiency, and timeliness of services. Primary focus of the training has been and will continue to be on the use of iPads in case management and associated applications.

5. **Social Media.** This training will focus on the appropriate use of social media as an outreach strategy with clients, businesses, and the public.

System of personnel development

1. New staff training will be provided to an estimated 19-24 new staff annually. This responds to the identified need to develop fundamental vocational rehabilitation knowledge and skill related to job performance in newly hired staff.

New employee training classes include the following:

- VR Implementation Training (4 days)
- QE2– Case Management System (1 day)
- Motivational Interviewing (5 days)

2. Training in the functional aspects of disabilities, service delivery and team services will occur at the local office level utilizing workshops, distance learning, podcasts, and continuing education.

3. The EDC through LINK will be used to identify areas of individual development and performance improvement. The EDC responds to individual needs as well as organizational needs of succession planning, leadership development, and capacity building.

4. Acquisition and dissemination of significant knowledge from research and other sources to staff ensures access to new knowledge and learning in the field of vocational rehabilitation. The system of staff development must provide for the on-going renewal and updating of the entire organizational knowledge and skill base, requiring a long-range training plan.

(5) Personnel to Address Individual Communication Needs.

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Nebraska VR, to the maximum extent possible, recruits and hires qualified personnel who are able to communicate in the native languages of applicants and recipients with limited English speaking ability. An increased salary differential is offered to individuals who are bilingual or fluent in American Sign Language (ASL). Interpreter services for persons with limited English speaking ability are obtained from agencies, vendors, ethnic organizations and advocacy groups. Nebraska VR has staff with sign language skills and staff fluent in a foreign language.

Deaf Services Unlimited and LanguageLine Services, Inc. are contracted with to provide on-demand and prior arranged interpreting services via video or phone. Deaf Services Unlimited provides video remote interpreting (VRI) and CART service while LanguageLine Services, Inc. provides VRI for sign language and video remote or phone interpreting for foreign languages. These remote services are provided when in-person interpreting services are not available. The State of Nebraska has recently passed legislation requiring the use of only licensed sign language interpreters and licensed VRI businesses in Nebraska.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act.

Nebraska VR coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) by: (1) exchanging needs assessment findings in areas or topics of mutual concern, (2) exchanging schedules of training and personnel development activities, and (3) joint development of training programs of mutual concern and priority, and joint funding of trainer costs for conducting joint training, when appropriate.

(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 most significant disabilities, including their need for supported employment services; (B) who are minorities; (C) who have been unserved or underserved by the VR program; (D) who have been served through other components of the statewide workforce investment system; and (E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services. (2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and (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.

The Comprehensive Statewide Assessment was conducted between October 1, 2013 and August 30, 2015 for Federal Fiscal Years 2016, 2017, and 2018. During this assessment period, the Workforce Innovation and Opportunities Act was passed July 2014 and proposed regulations issued April 2015. Final regulations are expected in the spring of 2016.

The State Rehabilitation Council (SRC) held 8 meetings during the assessment period. At each meeting, the SRC was apprised of and provided input on the assessment data, agency's activities, performance data, consumer satisfaction survey results, client issues addressed by the Client Assistance Program, agency's response to SRC recommendations and partnership updates

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including presentations by some of the partners. The SRC was updated on WIOA from its introduction, passage and the input Nebraska VR provided on the proposed regulations.

While the assessment is intended to help the VR agency establish it goals, strategies and priorities in addressing the rehabilitation needs of Nebraska's with disabilities in the next three fiscal years, the pending provisions of WIOA and the Rehabilitation Act will have the greater impact on the Nebraska VR program's goal and strategies.

(A) Individuals with most significant disabilities, including their need for supported employment services

Major service needs include —

- ***Impact and challenge from changing demographics in serving individuals with the most significant disabilities.*** *Nebraska continues to see a declining rural population. 59.95% of the state's population reside within 5 of the 93 counties. T*he agency must continue to look at how best to allocate staff resources throughout the state and adequately serve both population sets. As noted in the previous comprehensive assessment community resources and employment opportunities seem to follow the population shift. Individuals with serious mental health impairments continue to be the largest disability category being served by Nebraska VR.

- ***Challenge of locating, accessing and coordinating needed community services and supports.*** Consistent with prior comprehensive assessment of rehabilitation needs, individuals with the most significant work disabilities continue to have complex needs, complicated by poverty. Social services and support networks, both governmental and non-profit, have not been able to maintain much less increase service levels to meet these needs. The new governor and the legislature will be evaluating the previous trend of moving social services from local community offices to area call centers which has resulted in service access issues. However, Nebraska VR intends to maintain its strategic office locations across the state and travel to all counties.

- ***Access to supported employment extended supports for students with developmental disabilities desiring to exit high school at an age appropriate time.*** Extended supports are still not available for individuals with developmental disabilities under age 21 delaying their access to supported employment services. With the mandate to expend half of Title VI funds on youth with disabilities, Nebraska VR has approached and will continue to approach the Nebraska Department of Health and Human Services on strategies that will address that service delay. With a recent change in the governorship and newly hired administrators, Nebraska Department of Health and Human Services, the discussions have only just begun.

- ***Skill training services provided in integrated competitive employment and community settings.*** Many individuals with cognitive disabilities struggle with traditional post-secondary classroom and/or segregated training programs. In addition to On-The-Job Training services, Certificate Programs and Project Search sites have proven to be another

successful alternative for adults and students to achieve employment without pursuing post-secondary training. The collaboration between businesses and community colleges in the Certificate Programs and business and high schools in the Project Search programs results in individuals with cognitive and other impairments acquiring the desired work skills and jobs.

Post-secondary training continues to be the highest expenditure category among the VR services as individuals choose careers and professions that require certificates and degrees. VR staff provides occupational information and Nebraska Labor Market data on demand occupations so clients can make an informed decision on their vocational goal.

•**Rehabilitation technology services to accommodate functional limitations.** Nebraska VR continues a strong ongoing partnership with the Nebraska Assistive Technology Partnership (ATP) that allows Nebraska VR to offer up-to-date and effective rehabilitation technology service to our clients throughout the VR process. In FY 2014, 478 clients were referred to and received services from ATP through our grant to the ATP program. The identification of solutions through a technology transfer approach has provided individuals with significant disabilities expanded opportunities for employment as reflected in our program's increase in successful employment outcomes. ATP staff are co-located in most of the VR services offices which facilitates this effective collaboration.

•***Transportation for employment and independence***. Nebraska's 88 rural counties lack transportation resources that limit the opportunities for employment and independence among persons with significant work disabilities. Resources for addressing this need vary by community and for the most part transportation services are viewed as likely areas for budget cuts. Private and non-profit transportation resources also struggle with maintaining service levels essential to the elderly and persons with significant disabilities even in the more populous counties and cities. An emerging trend among students and youths with disabilities is the lack of interest in obtaining a driver's license which contributes to the issue of transportation.

(B) Individuals who are minorities

The state's population growth has continued to be primarily among minority racial and ethnic groups. The growth has occurred in the more populous Nebraska cities and counties. The Hispanic or Latino (of any race) population grew by 77% since the 2000 census and numbers 167,405, which is 9.2% of the state's population. It is estimated that by 2020, the Hispanic population in Nebraska will reach 242,531 and represent 12.5% of the state's population.

The Asian, non-Hispanic, population grew by 47% and represents 1.8% of the state's population based on the 2010 census and is projected to be the third fast-growing minority group in the state. The Black and African American population grew by 20.9% and represent 4.5% of the state's population. The White, non-Hispanic, population only increased by 0.4%.

Refugee Resettlement in Nebraska from 2000 to 2010, the most recently reported data, totaled

5,414 from 37 different countries.

Nebraska VR has met or exceeded the Standard/Indicator 2.1 six of the last seven years. Still, there is a need for Nebraska VR to be more effective in its outreach and marketing to diverse populations to improve minority referrals. While there are foreign language interpreters in the state, Nebraska VR has written agreements with two providers to provide phone and video remote foreign language services. These services can be pre-arranged or on-demand.

Nebraska VR will be working more closely with the Adult Education and Family Literacy programs which serve minority and refugee populations.

(C) Populations who have been unserved or underserved by the VR program

SSDI and/or SSI recipients may be an underserved population by virtue of the fact that Nebraska VR's percentage of clients receiving SSDI and/or SSI is below the national and agency mean. However, SSA data indicates that the state's percentage of individual's age 18 – 64 on SSDI or SSI on the basis of a disability is also below the national average.

As previously mentioned, youth with intellectual disabilities who exit or would like to exit school at an age appropriate time are unserved until they reach the age of 21 and can then receive Developmental Disabilities services and supports. With the proposed WIOA regulations, Nebraska VR intends to approach the HHS-Developmental Disabilities program with a plan to serve these youth prior to age 21.

Strides have continued to be made in using screening tools and specialized vocational assessments to identify Nebraska VR clients with brain injury and other cognitive disorders in order to better align services and supports required to achieve employment. The identification and use of assistive technology options have also proven to be beneficial to individuals with a brain injury.

Nebraska VR received a TBI Implementation Partnership Grant from the Health Resources and Services Administration in June 2014. The purpose of the 4-year grant is to increase access to rehabilitation and community-based services for individuals with brain injury. Nebraska VR is the lead agency for brain injury in the state and collaborates with several other state agencies and programs to carry out grant-funded activities. While progress has been made, information collected is a part of this grant finds that there are still service gaps and resources that exist for this population.

Nebraska VR is also active in promoting services to individuals with Autism Spectrum Disorders, a disability population that continues to grow nationally and is now the fourth largest impairment group in Nebraska schools. Nebraska VR staff have attended the National Autism Leadership Summit, joined the State Autism Collaborative, trained vocational evaluators in best practices for vocational assessment for individuals experiencing autism spectrum disorders, and have presented at the ASD Network Conference. Supported employment services to individuals with autism spectrum disorders have proven to be quite successful providing impetus to expand those

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services.

(D) Individuals who have been served through other components of the statewide workforce investment system and (E) Individuals who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services

With the implementation of WIOA, it is expected that there will be a significant reversal of the decline in referrals to the VR program in recent years under the former workforce investment system. The major contributing factor was the move to on-line registration and on-line services at the American Job Centers that was not adequately identifying applicants who had disabilities. The collaboration that has occurred among the core partners since the passage of WIOA has already resulted in a greater awareness of each core partners program and opportunities for reciprocal referrals and service coordination.

Nebraska VR staff will continue to serve on the new regional workforce boards which will now have a larger business representation. It is important that VR staff are aware of and promote among its clients, the jobs-driven, work-based learning, career pathways and industry sector initiatives put forth by the workforce system.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State

Strides have been made in developing and improving evidence-based, flexible vocational skill training, behavior management, and rehabilitation technology services and supports to be provided in natural environments, including integrated competitive employment sites.

Particular emphasis will be focused on establishing and developing supported employment services for youth exiting high school prior to age 21 and expanding supported employment services for individuals with autism spectrum disorders or acquired brain injuries.

(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.

The Nebraska Department of Education Statewide Count of Special Education Students by Impairment shows the four largest impairment groups continue to be Specific Learning Disability, Other Health Impaired, Intellectual Disabilities and Autism. While Nebraska has one of the highest 4-year high school graduation rates in the country (89.68%) and 6-year graduation rates (91.1%), there is still concern for those students who have dropped out of school or who graduate but do not make a successful transition to employment and independence and become involved within the Juvenile Justice system or dependent on public assistance. The provision of pre-employment transition services will hopefully lead to a more successful transition for all students and youth with a disability into employment and adult life.

Nebraska Department of Education Special Education Data by Impairment shows a three-year increase in the number of students identified as experiencing Autism. This identification is an

educational diagnosis rather than a medically verified diagnosis. Regardless, individuals with Autism Spectrum Disorders experience difficulty in employment due to their social and communication skills and their repetitive and restricted behaviors and interests.

Nebraska VR has a significant presence in the high schools across the state assessing and counseling, attending IEPs and working with the schools and other community partners. This provides a foundation for developing and offering a wide range of Pre-Employment Transition Services.

On average, 35.4% of clients served by Nebraska VR are age 21 or younger when applying for VR services.

(k) Annual Estimates

(1) The number of individuals in the state who are eligible for services.

The 2014 Annual Disability Statistics Compendium published by the Rehabilitation Research and Training Center on Disability Statistics and Demographics estimates of number of Nebraskans with a disability of any age in 2013 at 205,354. For the age range of 18 – 64 the estimate is 99,698 which represents 8.9% of the population for that age range. This places the State of Nebraska in the lowest prevalence range of 7.9% to 9.1%. By comparison, the other prevalence ranges are 9.1% to 10.5%, 10.5% to 12.6% and 12.7% to 18.1. The report estimates 45,352 individuals with a disability in the 18 – 64 year age range are working in some capacity with approximately 12,064 of those individuals working full-time.

When also considering students and youth with a disability under the age of 18 and individuals over the age of 64 with a disability, the upper range of the number of individuals with a disability of working age falls between 118,500 to 123,700. Best guesstimate of the potential number of Nebraskans with disabilities who want to work and are eligible for services is 75,000 to 83,000. In reality, only 7 to 7.5% of the potential number of Nebraskans with disabilities will apply for VR services in FY 2016.

(2) The number of eligible individuals who will receive services under The VR Program; The Supported Employment Program; and Each priority category, if under an order of selection.

Title 1, Part B The estimate of eligible individuals who will receive services with funds provided by Title I, Part B during FY 2016 is between 6,500 and 7,150. The estimate of case service expenditures for FY 2016 is between $6,750,000 and $7,250,000.

Title VI, Part B The number of individuals expected to receive supported employment services in FY2016 is expected to be between 760 and 878. This includes all individuals receiving supported employment services regardless of the funding source. Based on the last two years' expenditures, Nebraska VR will spend over $1,000,000 for supported employment services which greatly exceed the Title VI grant of $270,000.

(3) The number of individuals who are eligible for VR services, but not receiving such services due to an order of selection; and (4) The cost of services for the number of individuals

estimated to be eligible for services. If under and order of selection, identify the cost of services for each category.

Nebraska VR is not currently under an Order of Selection and does not anticipate needing to go under an Order of Selection in FY 2016.

(l) State Goals and Priorities

Nebraska VR's State Goals and Priorities have been aligned to the strategic vision of Nebraska for its workforce System. The vision maintains a shared focus on seamlessly providing services to jobseekers, including individuals with disabilities, at all stages of employment and providing a trained and qualified workforce for businesses.

The following aligned goals incorporate input from the State Rehabilitation Council provided during the August 2015 Council meeting.

Goal 1: Improve the communication between core partner programs and other key stakeholders to ensure coordinated and seamless services.

Continue participation on the Nebraska Partners Council. The Partner Council represents program stakeholders in Nebraska's Workforce Delivery System model. The Nebraska Partner Council works to strengthen cross agency partnerships that focus on workforce solutions to ensure subpopulations are being afforded quality work opportunities and employers have a diverse and ready workforce. The Council is dedicated in finding employer identified skill gap solutions, resource solutions, work readiness solutions, and innovative workforce solutions while ensuring the needs of subpopulations are well represented. Members include the Nebraska Department of Education, Department of Labor, Department of Economic Development, Job Corps, Proteus (Migrant Seasonal Farmer), Indian Center, Department of Health and Human Services, Career Technical Education, Nebraska Community College Association, Adult Basic Education, Senior Community Services Program, Unemployment Insurance, Office of Employment and Training, Vocational Rehabilitation and Temporary Assistance for Needy Families. The Director of Nebraska VR will serve as the Chair of the Council beginning January 1, 2016.

Continue to develop the interface for a common intake and reporting system and a process for sharing of information as necessary. Initial discussions have begun but are dependent on further guidance from RSA and DOL.

Increase the retention rate of VR staff to ensure the availability and participation of qualified rehabilitation counselors, evaluators and placement specialists enhancing the likelihood of coordinated and seamless services and improving communication by preserving established cross partner relationships. The agency will develop strategies to provide for a competitive salary for all positions, training to develop and maintain knowledge and skills, and flexibility to enhance autonomy as much as possible within a state agency environment.

Goal 2: Increase the workforce participation of individuals with disabilities through the provision of services and supports to prepare them for careers.

Maintain a high quality of service as measured by the rehabilitation rate and other VR program standards and indicators. Nebraska VR has maintained a rehab rate of over 66% the last two fiscal years. Until the final rules and regulations are issued, the agency will utilize the former VR standards and indicators to evaluate its success in maintaining or improving the quality of services.

Increase the engagement of individuals with disabilities by employing motivational interviewing strategies, implementation of the Meet You Where You Are rapid engagement model, and the integration of technology, including MyVR and other social media.

Motivational Interviewing: Nebraska VR is committed to integrating motivational interviewing as a strategy to help consumers determine if they are ready to make decisions about the next steps to getting a job and as a strategy to keep consumers engaged in the process. This is a consumer-centered directive counseling approach to assist consumers to recognize and reduce barriers to change. Motivational interviewing has been shown to increase consumer motivation and promote more active participation in services.

Meet You Where You Are: MYWYA is a major initiative of Nebraska VR that captures how the agency intends to provide services to all individuals with disabilities who come to VR for services. The initiative respects that each individual comes with a different set of experiences, skills, knowledge and interests and uses that information to determine, in collaboration with the individual, what services are of most benefit. Instead of the traditional linear process, the agency aligns the strengths of the VR team and other resources in a way that recognizes the uniqueness of each individual and assists with achieving their employment goals in a timely manner. Rapid Engagement, based on Vermont's Progressive Employment model, is a tool or strategy, as an element of the MYWYA model, that seeks to connect an individual with a business in the community as soon as possible. This could be a mock interview, an individual tour, volunteer work, an on the job evaluation or on the job training. Rapid Engagement allows an individual to gain exposure to the world of work, acquire work experience, and creates an opportunity for the employer to get to know the individual without an obligation to hire. Rapid Engagement can also be a potential placement strategy as an employer may ultimately find the individual to be a good fit for their business.

MyVR and Social Media: Nebraska VR will continue to promote the use of MyVR, a consumer side social media-type application that allows for enhanced communication and engagement with staff and client access to selected case management information. MyVR was developed and piloted in partnership with ICI-UMass' Learning Collaborative under the auspices of the NIDILRR funded RTAC on VR Program Management. Nebraska VR will maintain its presence in other social media arenas such as LinkedIn, Facebook, and Twitter.

Increase the participation of Native Americans in VR services. The State Rehabilitation Council suggested that the agency explore opportunities to collaborate with any existing American Indian VR programs in Nebraska to increase the number of Native Americans with disabilities being

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served. The one existing program in Nebraska is no longer funded. The agency will identify possible partnerships to encourage other eligible tribes/organizations to apply for an AIVR grant as available.

Collaborate with Workforce Development core partners on the development and availability of soft skills training for all individuals. The core partners will explore the possibility of joint soft skills training. The potential collaboration could reduce duplication and increase the availability of training opportunities across the state.

Goal 3: Strengthen the alignment between education, training, and employer workforce needs.

Maintain the Business Account Manager model and consider expansion to other areas of the state. Nebraska VR has hired Business Account Managers (BAM) in Omaha, Norfolk, and Kearney to establish relationships with businesses, trade associations, business and human resources organizations to identify staffing patterns, skill requirements, support needs, training preferences, etc., to be an effective representative to Nebraska VR teams on behalf of businesses. The BAMs will seek out opportunities to establish work-based learning partnerships, OJE/OJTs, apprenticeships, and internships with businesses. These positions take a jobs driven approach in aligning the education and training requirements of businesses with the qualifications of VR eligible clients to better meet the workforce needs of employers.

Maintain and expand the number of certificate programs that serve as an entry-level training program into an established career pathway. Certificate Programs offer hands-on training programs for students and adults with disabilities. This opportunity results from a partnership with local Nebraska VR service offices, three to five core business partners in the area, a community college, and local schools. The businesses have common interests in the types of skills and abilities they need to fill job vacancies. Together, the businesses work to identify exactly what they need in job candidates qualified to fill job vacancies. They can fit their hiring and retention needs with the opportunity to design a curriculum. The training includes work readiness or soft skills training, keying in on the basics of being on time and dependable. Work place communication skills are included. Students take classes, tour business, and either work part-time or participate in an internship with employer partners. The agency will look to expand partnerships across the state as well as beyond the current areas of auto tech, HVAC, welding, electrician and community health worker.

Collect information on the business/employer level of satisfaction with VR services and programs. Nebraska VR will reinstitute an employer satisfaction survey to provide feedback on business-focused initiatives. This will be revised at the issuance of federal guidance on the final employer measures under WIOA.

Goal 4: Provide coordinated services that lead to gainful employment and the likelihood of economic self-sufficiency.

Move more individuals to economic self-sufficiency through the implementation of the Career

Pathways Advancement Project. The CPAP is funded under a grant from RSA and uses an "Upskill/Backfill" model to train individuals in emerging and growing industry sectors. Career Pathway Recruiters will contact 1,200 former VR clients now working in targeted industry sectors such as information technology, manufacturing, transportation, distribution and logistics, to inform them of an opportunity to receive additional training and education to advance their careers. The grant will provide the necessary financial assistance to allow individuals with disabilities to participate in an established career pathway initiative in collaboration with the Nebraska Department of Labor, several post-secondary educational institutions, and businesses. Approximately 50-60 individuals will move up the career pathway by upgrading their skills and knowledge, creating opportunities for other individuals with disabilities to backfill the vacant positions. Individuals with disabilities will be more likely to be economically self-sufficient as they advance upward in their career pathway in the targeted high demand sectors.

Increase our capacity to provide customized employment services and options to consumers and employers. Nebraska VR is one of the states selected to receive technical assistance under the JD-VR TAC. The impending changes in Section 511 of WIOA, and the agency's experience in working with individuals with significant disabilities, point to an increased emphasis on Customized Employment. In order for Nebraska VR to be successful in the implementation of Customized Employment services for individuals with significant disabilities, there are two areas of need for intensive technical assistance and training to be provided: 1) strategies to increase employer awareness and acceptance of a Customized Employment approach; and 2) training to VR staff at all levels to develop the necessary skills, knowledge and buy-in to the Customized Employment approach and to work with businesses to negotiate customized employment opportunities. The JD-VR TAC will work with Nebraska VR to increase our capacity to provide customized employment services through the provision of training and technical assistance. The expected outcomes are:

- An increase in the number and type of businesses adopting a customized employment approach and establishing a CE job for an individual with a significant disability.
- An increase in the number of individuals with a significant disability, especially individuals with an intellectual or developmental disability, participating in competitive integrated employment.
- An increase in the quality of employment (as determined by the salary, benefits, number of hours worked, etc.).

Maintain and increase the number of Project Search sites in Nebraska. Project SEARCH is a partnership between Nebraska VR, a business, area school systems, the Commission for the Blind and Visually Impaired, Assistive Technology Partnership, and Division of Developmental Disabilities. This one-year school-to-work program is business led and takes place entirely in the workplace. The experience includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. The goal upon program completion and graduation is to utilize skills acquired during the internship for gainful employment and greater opportunity for economic self-sufficiency. Nebraska has established 17 Project Search sites and

will seek to expand the number of sites during the next year.

Collect information on the consumer level of satisfaction with VR services and programs. The State Rehabilitation Council and Nebraska VR work in collaboration to conduct consumer satisfaction surveys via a contract with Easter Seals Nebraska. This survey will continue and will be reviewed to make revisions as necessary based on the final rules and regulations, including any pertinent standards and indicators under the performance measures.

(m) Order of Selection Describe

Not applicable. Nebraska VR is not implementing an Order of Selection.

(n) Goals and Plans for Distribution of Title VI

Nebraska VR has for the last few years allocated the funds received under section 603 to providing supported employment services to persons with the most significant behavioral health disabilities. Additionally, the program's expenditures for supported employment services to this population are supplemented by section 110 funds. With the funds under 603(d) to be expended on youth with the most significant disabilities, additional 110 funds will be needed to continue the service level for persons with significant behavioral health disabilities. The funds received under Title VI, 603 will continue to be distributed in the form of contractual payments for the costs of supported employment services provided to eligible persons with the most significant behavioral health disabilities.

Nebraska VR has a written agreement with the state's Division of Behavioral Health Services that promotes evidence-based supported employment services to individuals with behavioral health disabilities. Written contracts have been established with a qualified provider in each of the state's six regions. These contracts identify the need for supported employment, the specific evidence-based supported employment services available from the provider leading to competitive integrated employment which may include transitional employment, and their negotiated projected outcomes. The Division of Behavioral Health Services also provides funds for supported employment and extended services.

Nebraska VR and the Division of Development Disabilities have a written agreement to co-fund milestone outcome payments for individuals with intellectual disabilities.

For individuals with autism spectrum disorders who do not qualify for behavioral health or developmental disability services and funding, Nebraska has a separate written agreement with the Autism Center of Nebraska.

Goals

Behavioral Health

To maintain or increase the number of persons with a most significant behavioral health disability served through providers using an evidence-based model of supported employment services.

Number served in FY 2016: 600 - 693

To meet or increase the number of persons with a most significant behavioral health disability who achieve a successful competitive integrated employment outcome through providers using an evidence-based model of supported employment services.

Number of successful employment outcomes in FY 2016 – 230

Autism Spectrum Disorder

To maintain or increase the number of persons with a most significant autism spectrum disorder disability served through a provider using an evidence-based model of supported employment services.

Number served in FY 2016: 80 – 92

To meet or increase the number of persons with a most significant autism spectrum disorder disability who achieve a successful competitive integrated employment outcome through a provider using an evidence-based model of supported employment services.

Number of successful employment outcomes in FY 2016 – 60

Acquired Brain Injury

To maintain or increase the number of persons with a most significant acquired brain injury disability served through providers using an evidence-based model of supported employment services.

Number served in FY 2016: 20 – 23

To meet or increase the number of persons with a most significant acquired brain injury disability who achieve a successful competitive integrated employment outcome through providers using an evidence-based model of supported employment services.

Number of successful employment outcomes in FY 2016 – 14

Intellectual Disabilities

To maintain or increase the number of persons with a most significant intellectual disabilities served through providers using an evidence-based model of supported employment services.

Number served in FY 2016: 60 – 69

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To meet or increase the number of persons with the most significant intellectual disabilities who achieve a successful competitive integrated employment outcome through providers using an evidence-based model of supported employment services.

Number of successful employment outcomes in FY 2016 – 58

Youth with the Most Significant Disabilities

Most of the providers of supported employment services in Nebraska also serve youth with a disability. The major challenge will be increasing the capacity of these providers to serve youth with disabilities exiting high school prior to age 21.

Nebraska VR anticipates that all of the 50% of funds received under section 603(d) for youth with a significant disability will be used to fund both supported employment services and the necessary extended services for youth with intellectual disabilities, autism spectrum disorders and brain injuries acquired as youth. It is also anticipated that Nebraska VR will need to supplement these supported employment services with section 110 funds, especially to fund up to four years of extended services.

Goal (*Subset of the above goals*)

To serve 80 to 100 youth with the most significant disabilities in FY 2016 using an evidence-based model supported employment services.

To achieve 40 - 60 successful competitive integrated employment outcomes for youth with significant disabilities in FY 2016 using an evidence-based model of supported employment services.

(o) State's Strategies

(1) The methods to be used to expand and improve services to individuals with disabilities.

Methods to be used by Nebraska Vocational Rehabilitation to expand and improve services to individuals with disabilities include:

- Continue to provide motivational interviewing training with new and existing staff on how to use this engagement strategy throughout the VR process.
- Fully implement the *Meet You Where You Are* model of Rapid Engagement.
- Use MyVR and Social Media strategies to increase opportunities for communication between staff and clients.

(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.

The agency contracts with the Nebraska Assistive Technology Partnership (ATP) to provide rehabilitation engineering and assistive technology services to agency consumers at all stages of the rehabilitation process. Consumers are referred to ATP by Nebraska VR staff for all assistive

technology assessments, funding coordination and assistive technology solutions. ATP offices are located throughout the state and in some cities are co-located with the VR office. Based on referral data available at the writing of this plan, the VR agency is expected to make approximately 450 - 500 referrals to ATP annually.

(3) The outreach procedures that will be used to identity and service 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.

Each team develops an outreach plan. As part of the plan, consideration is given on how to target minority populations. In addition, our presence in all Nebraska high schools assists in reaching all racial and ethnic minority groups as they occur naturally in schools.

- Continue to work with El Centro de las Américas on technical assistance.
- Continue to run feature articles in the Nebraska *Mundo Latino* Newspapers.
- Continue the priority of hiring bilingual staff. Increased pay is available for staff who are bilingual.
- Establish and maintain service agreements with qualified foreign language interpreters and utilize phone and video remote foreign language interpreting when on-site interpreting is not available.
- Continue to translate agency audio/visual media, brochures and forms in other languages.
- Continue to serve individuals with disabilities with a Deferred Action for Childhood Arrivals (DACA).
- Attend community cultural events to promote VR services.

(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to post-secondary life (including the receipt of VR services, post-secondary education, employment and pre-employment transition services).

Nebraska Vocational rehabilitation utilizes various methods to serve students with disabilities within the state, in order to help provide them the education and training for future employment. These methods are included below:

- Maintain the statewide and five (5) regional Youth Leadership Councils that provide students with opportunities to develop leadership skills. Seek input on suggestions from a youth perspective on the five (5) core Pre-Employment Transition Services activities.
- Continue to financially support the five (5) regional Transition Youth Conferences.
- Develop, revise and disseminate publications on PETS and Transition Services for both youth and students with a disability and their families.
- Maintain existing Project Search sites and develop additional sites in response to requests from schools and/or employers.
- Maintain existing Certificate Programs and develop additional programs based on local labor market needs.

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- Continue VR representation on the Special Education Advisory Council (SEAC) subcommittees.
- Continue to serve on the Nebraska Transition Advisory Committee and the Transition Practitioner's Committee.
- Develop agreements with local LEAs for provision of Pre-Employment Transition Services (PETS) and Transition Services.

(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Counseling, placement, and evaluation services are provided by Nebraska VR staff.

(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

Strategies to meet performance accountability measures under Section 116 of WIOA are outlined as follows:

- Develop strategies in coordination with the appropriate six core partner programs and participating Combined State Plan partners once benchmarks are established.
- Implement the technical assistance and training on customized employment with VR staff and providers. Technical assistance will be provided by the Job-Driven VR Technical Assistance Center.

(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

- Continue participation on the Nebraska Partners Council to strengthen cross agency partnerships that focus on workforce solutions.
- Dovetail with the Nebraska Department of Labor's established career pathways initiatives through our Career Pathways Advancement Project.

(8) How the agency's strategies will be used to: (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment; (B) support innovation and expansion activities; and (C) overcome identified barriers related to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

The agency's strategies are fully explained in the State Goals and Priorities section.

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals.

(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified and Combined State Plan for the most recently completed program year were achieved. The evaluation must:

The following represents Nebraska VR's evaluation and report of progress on the agency's FY 2014 State Goals and Priorities.

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(A) Identify the strategies that contributed to the achievement of the goals —

Goal: Increase the Rehabilitation Rate (Goal of 65%)

In FY 2014, Nebraska Vocational Rehabilitation:

(1) Conducted quarterly reviews with management staff to review progress on Standards & Indicators including the rehabilitation rate.

(2) Continued Project Search training programs with 8 hospitals, a warehouse distribution center, and 3 hotels. Added Project Search training programs with a manufacturer, payment processing center, and another hospital. Students in these programs achieved a 75% employment rate. Since the first site in 2009, 206 students with disabilities have participated in Project Search.

(3) Represented Nebraska as point of contact on The National Employment Team (NET). Pursued developing partnerships with employers identified through The NET.

(4) Continued to contract with the Abilities Fund to provide all necessary services for clients with a self-employment goal.

(5) Continued outcome-based supported employment services for individuals with behavioral health, acquired brain injury, autism spectrum disorders and intellectual disabilities.

(6) Expanded Certificate Training Programs to a total of 13 sites based on local employer needs in conjunction with community colleges and high schools. The rehab rate for FY2014 was 57%.

(7) The statewide rehab rate for FY2014 was 66.32% which exceeded VR's goal and the federal standard.

Goal: Increase the quality and timeliness of services

In FY 2014, Nebraska Vocational Rehabilitation:

(1) Continued a state-imposed standard of 55 days for job search and placement.

(2) Continued to monitor the placement requirements that have been developed.

(3) Continued to have placement staff marketing with employers to identify specific job openings.

(4) Provided monthly labor market information specifically addressing each team's local labor market.

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(5) Provided additional training through monthly lunch-time video conferencing to all placement staff in the areas of: 503 Compliance, How to Find Labor Market Information on the Department of Labor Website, Effective Resumes, Employer Panel on Effective Interviewing, and Working with Clients Who Have Criminal Backgrounds.

(6) Utilized iPads to enhance timely VR service delivery.

(7) Average consumer wage was $11.09 in FY 2014, an increase from FY 2013's Average Consumer Wage of $10.51.

(8) The amount of time that a client was in employment services for FY2014 was 70.86 days.

(9) QE2 on-line case management system continues to be revised to enhance utilization.

(10) Continue statewide implementation of MyVR, a computer-based client communication application, to enhance timeliness of communication between staff and clients.

Goal: Improve client satisfaction and engagement

In FY 2014, Nebraska Vocational Rehabilitation:

(1) Continued the employment outcome survey conducted at the time of the 90-day employment monitoring follow-up. Client satisfaction was 92.75% in FY2014.

(2) Reported survey results are tabulated by the Client Assistance Program (CAP) and provided to the State Rehabilitation Council (SRC) at each of the meetings throughout the year.

(3) Provided management staff the ability to review the results of client satisfaction surveys in order to address any team issues in a timely fashion.

(4) Continued quarterly reports from the CAP on the type of client concerns and CAP's recommendations to Nebraska VR leadership.

(5) Continued the Consumer Input Committee as a part of the SRC to provide direct client input on program marketing materials and marketing strategies.

(6) Continued quarterly agency ombudsman reports to SRC.

(7) Continued the use of LinkedIn and Facebook as communication strategies to enhance client engagement.

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(8) Provided another statewide training through Technical Assistance and Continuing Education (TACE) and follow-up support on motivational interviewing to improve client satisfaction and engagement.

Goal: Develop effective community partnerships

In FY 2014, Nebraska Vocational Rehabilitation:

(1) Continued to collaborate and provide funding for Nebraska Career Connections through the Nebraska Department of Education, Department of Labor, Nebraska Public Power District, and Partnerships for Innovation.

(2) Continued and added Project Search partnerships involving high schools and businesses. Continued to explore and promote partnership opportunities with other community businesses and schools.

(3) Continued the supported employment program for individuals with severe and persistent mental illness, acquired brain injury, autism spectrum disorders and intellectual disabilities through an outcome-based payment process.

(4) Continued and added Certificate Programs across the state.

(B) Describe the factors that impeded the achievement of the goals and priorities.

(1) Staff turnover affects timeliness of services due to the amount of time to orient and train staff to be fully functional.

(2) Small rural population over a large geographic area creates issues with timeliness and availability of services.

(3) The growing number of non-English speaking individuals with disabilities and the lack of availability of interpreters results in delays of services.

(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.

(A) Identify the strategies that contributed to the achievement of the goals

(1) Maintained supported employment partnerships for mental health in all 6 regions of the state.

(2) Piloted a revised supported employment milestones and payment system to demonstrate the viability to providers.

(3) Finalized a protocol manual in collaboration with the Division of Behavioral Health following the pilot.

(4) Utilized Title I funds to supplement Title VI, Part B funds to adequately address the mental health supported employment service needs in the State of Nebraska.

(5) Served 672 behavioral health supported employment cases.

(B) Describe the factors that impeded the achievement of the goals and priorities

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(1) A change in leadership and direction within the Division of Behavioral Health delayed the implementation of the final protocol.

(2) The supported employment providers were hesitant to accept the new milestones and payment process.

(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Since the performance accountability indicators were not in effect in FY2014, the following is a summary of the program's performance utilizing Standards & Indicators and RSA reporting data.

The agency met all of the performance Standards & Indicators in FY 2014.

Applied for Services
FY2009 — 5,013
FY2010 — 5,069
FY2011 — 4,812
FY2012 — 5,246
FY2013 — 5,677
FY2014 — 5,558

Eligible for Services
FY2009 — 4,429
FY2010 — 4,513
FY2011 — 4,237
FY2012 — 4,439
FY2013 — 5,407
FY2014 — 5080

Started Services
FY2009 — 2,710
FY2010 — 2,955
FY2011 — 2,877
FY2012 — 2,845
FY2013 — 3,314
FY2014 — 3,168

Received Services
FY2009 — 6,018
FY2010 — 6,397
FY2011 — 6,519
FY2012 — 6,364
FY2013 — 6,745

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FY2014 — 6,789

Successfully Employed
FY2009 — 1,568
FY2010 — 1,677
FY2011 — 1,799
FY2012 — 1,806
FY2013 — 1,887
FY2014 — 2,014

Supported Employment Outcomes
FY2009 — 201
FY2010 — 212
FY2011 — 270
FY2012 — 275
FY2013 — 325
FY2014 — 317

SE Mental Health Partnership Outcomes*
FY2009 — 179
FY2010 — 173
FY2011 — 218
FY2012 — 222
FY2013 — 212
FY2014 — 224 **SE Mental Health Partnership Outcomes are a subset of the Supported Employment Outcomes*

SE Autism Outcomes
FY 2014 – 33 **SE Autism Outcomes are a subset of all Supported Employment Outcomes*

SE Acquired Brain Injury Outcomes
FY 2014 – 11 **SE Acquired Brain Injury Outcomes are a subset of the Supported Employment Outcomes*
SE Intellectual Disability Outcomes
FY 2014 – 49 **SE Intellectual Disability Outcomes are a subset of the Supported Employment Outcomes*

4. Provide a report on how the funds reserved for innovation and expansion (I&E) activities were utilized in FY 2014.

I & E funding for FY2014 totaling $122,474.21 was used to support the following:

(1) State Rehabilitation Council ($4,876.35)
(2) Transition Program ($49,948.98) and the Youth Leadership Council ($17,080.96) —

$67,029.94
(3) Grants & Contracts Specialist ($50,567.92)

The agency has pursued outside funding for the development of innovative activities, such as MyVR and Employer On-Demand Side Strategies (Certificate Program) supported by grants from the Institute for Community Inclusion.

(q) Quality, Scope, and Extent of Supported Employment Services

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, are including youth with the most significant disabilities.

Quality of Supported Employment Services All services provided will be of high quality, as judged by prevailing professional standards and such legal standards as may apply. Persons licensed, certified, or registered in accordance with the laws of the State of Nebraska to perform the services will render these services or, if the service is not regulated by the State, by persons who are able to demonstrate they are qualified by reason of education, training, and experience to perform the services.

Scope of Supported Employment Services The services made available by Nebraska VR using Title VI and Title I funds are limited to those initial services resulting in stable job performance in an integrated competitive work setting. These may include, as appropriate to individual needs:

1. An assessment of the need for supported employment services is supplementary to and provided after an assessment of eligibility and rehabilitation needs has been determined that a person is eligible for services and is a person with a most significant disability.

2. Development and placement in competitive integrated employment includes customized employment services for the maximum number of hours possible consistent with the person's unique strengths, resources, priorities, concerns, abilities, and capabilities.

3. Intensive on-the-job skills training and other training provided by skilled job trainers, co-workers, and other qualified persons is based on a systematic analysis of the work to be performed, and a systematic analysis of the employer's performance expectations and requirements. It is conducted in accordance with a written plan identifying the methods of teaching, instruction, and behavior management necessary to enable the individual to acquire skills and master the work to be performed, to regulate behavior in accordance with the employer's requirements and expectations, and achieve stable job performance. The training provides for a systematic reduction of intensive teaching, instruction, and behavior management methods to the lowest intervention level necessary to maintain stable job performance.

4. Other vocational rehabilitation services that are needed to achieve and maintain job stability include, but are not limited to —

    a. Interpreter services for individuals with hearing impairments to permit

communication between the individual and the skilled job trainer.

b. Occupational licenses and permits required by federal, state, and local law to perform an occupation.

c. Occupational tools and equipment required by the employer but not routinely provided to new employees.

d. Rehabilitation technology services including adaptations and modifications of the workplace.

e. Work clothing and uniforms required by the employer but not routinely provided to new employees, and safety shoes and other articles of clothing necessary to permit safe performance on the job.

f. Transportation from place of residence to the work site and return until the person can pay for the cost from earnings.

g. Benefits planning to ensure an understanding of work incentives and earnings reporting requirements.

h. Customized employment services to enhance the likelihood of competitive, integrated employment for individuals with significant disabilities.

5. Follow-up services, including regular contact with the employer, the individual with a most significant disability, the individual's parents, guardian or other representative, in order to reinforce and stabilize the job placement.

6. On-going monitoring services from the time of job placement until the transition to extended services from one or more extended services providers. These services include, at a minimum, the assessment of employment stability and, based on that assessment, the coordination or provision of specific services needed to maintain employment stability.

<u>Extent of Supported Employment Services</u>

1. Assessment of rehabilitation need for supported employment services are made available to the extent necessary to determine the nature and scope of services to be provided under an Individualized Plan for Employment (IPE) to achieve supported employment or to determine on the basis of clear evidence that an employment outcome cannot be achieved

2. Job development including customized employment and placement services are provided to the extent necessary to place the individual into competitive integrated employment

consistent with client's informed choice.

3. Intensive on-the-job and other training services are provided to the person to the extent necessary to achieve stable job performance, or to determine on the basis of clear evidence this cannot be achieved. Services are provided for a maximum of 24 cumulative months, or for youth with a disability (16-24) utilizing Title VI funds up to 48 cumulative months unless a longer period is provided in the IPE of the person.

4. Other services are made available to the extent necessary to support the individual achieving a successful competitive integrated outcome.

5. Follow-up services are provided to the individual to the extent necessary to assure that job stability has occurred, or to determine on the basis of clear evidence that job stability cannot be achieved.

6. On-going monitoring services are provided, at a minimum, twice monthly at the work site to assess employment stability and, based on that assessment, to coordinate or provide specific services needed to maintain employment stability. If off-site monitoring is determined to be appropriate, and is included in the person's IPE, it must, at a minimum, include two meetings with the person and one contact with the employer each month.

Timing of the Transition to Extended Services

Nebraska VR transitions the person to extended services provided by other public agencies, nonprofit agencies or organizations, employers, natural supports, or other entities no later than 24 cumulative months or 48 cumulative months for youth with a disability after placement in supported employment (unless a longer period is established in the IPE), provided that—

- the person has made substantial progress toward their hours per week goal in the IPE,
- the individual is stabilized on the job, and
- extended services will be available and provided without a hiatus in services.

Vocational Rehabilitation Certifications and Assurances

States must provide written and signed certifications that:	
1.	The **Nebraska Division of Rehabilitation Services** 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, and its supplement under title VI of the Rehabilitation Act;
2.	As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **Nebraska Department of Education** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, 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;

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, the Rehabilitation Act, and all applicable regulations[1], 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 **State Treasurer** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The **Nebraska VR Assistant Commissioner/Director** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Assurances

The State Plan must provide assurances that:	
1.	**Public Comment on Policies and Procedures:** The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

[1] Applicable regulations, in part, include the citations in footnote 6.

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.	**Administration of the VR services portion of the Unified or Combined State Plan*:*** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) 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 (Option A or B must be selected): (A) is an independent State commission. **Yes** (B) has established a State Rehabilitation Council (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(2)(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 is 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) **No** See Section 2 of this VR services portion of the Unified or Combined State Plan. (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11), (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.

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	(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) comply with all required available comparable services and benefits, determined to be available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act and. (E) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (F) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (G) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (H) comply with the requirements for the conduct of semiannual or annual review, 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, as required by section 101(a)(14) of the Rehabilitation Act. (I) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs (J) with respect to students with disabilities, the State, (A) has developed and will implement,

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	(i) strategies to address the needs identified in the assessments; and (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 (B) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).
5.	**Program Administration for the Supported Employment Title VI Supplement*:*** (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6.	(a) **Financial Administration*:*** 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. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7.	(a) **Provision of Supported Employment Services*:*** The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that: i. the comprehensive assessment of individuals with significant disabilities

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	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 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.

Nebraska Commission for the Blind (Vocational Rehabilitation Response)

(a) Input of the State Rehabilitation Council

The Nebraska Commission for the Blind and Visually Impaired (NCBVI) is a consumer-controlled agency. Since it is governed by a Board of consumers, there is no State Rehabilitation Council.

(b) Request for Waiver of Statewideness

All services provided by NCBVI are statewide. There is no request for a waiver.

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

Nebraska Commission for the Blind and Visually Impaired (NCBVI) works across the state of Nebraska to establish interagency cooperation with, and utilization of the services of all relevant entities, including entities which are not within the workforce system. NCBVI administrative personnel communicate and cooperate with representatives of the statewide or corporate level of such entities. Counseling and other staff of our District and area rehabilitation offices do so in their areas. There are no State Use Contracting programs in Nebraska.

In each office, NCBVI staff members identify and network with a wide range of professionals in both the public and the private sectors. Doing so serves multiple purposes. NCBVI's VR professionals become well-versed in the resources and opportunities available to blind consumers across Nebraska. They are able to make NCBVI services known to those same entities, to educate them about the tremendous resource available to them from blind and visually impaired community members. In some cases, NCBVI Counselors participate with local Chambers of Commerce, Lions Clubs, Rotary Clubs, Commissions or Area Agencies on Aging, Community Networking Councils, and related organizations.

The United States Rural Development Agency (RDA) administers programs related to self-employment, business opportunities, housing, and other community economic development activities. NCBVI collaborates by providing information to counseling staff about the RDA programs which might benefit their clients. NCBVI VR Counselors also provide information to RDA representatives about efforts to assist blind and visually impaired Nebraskans to access funds available for developing self-employment and business opportunities.

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NCBVI works to assure that all the programs of the RDA in Nebraska are made available to clients. We also are available to provide training about NCBVI services, and about blindness, to RDA personnel. With this training they are able to provide reciprocal referrals to persons participating in their programs who might be eligible for services from NCBVI.

NCBVI offices are located in six locations; NCBVI staff work in all communities across the State of Nebraska. Agency staff members go to where the referrals and clients live, to provide the rehabilitation services specific to each individual. In each area and statewide, they work with local, state, and regional resources available. These include, but are not limited to small business, women's and minority business initiatives, community commercial, recreational and educational programs, religious entities (churches, synagogues, mosques), and private or public organizations are available and relevant to helping blind Nebraskans achieve their employment goals.

The State Use Contracting program is not applicable to NCBVI.

(d) Coordination with Education Officials

Consistent with requirements of the Workforce Investment Act, NCBVI coordinates with entities within the WIOA system, including teachers of the visually impaired and education officials, to facilitate the transition of students with disabilities from school to the vocational rehabilitation service system. We have developed a number of strategies to address the seamless transition from school to work for blind students. The most formal is a Cooperative Agreement, signed and updated periodically.

The agreement delineates the responsibilities of the Commission (NCBVI), the Nebraska Department of Education (NDE) Special Populations Division, the Nebraska Center for the Education of Children who are Blind or Visually Impaired (NCECBVI), and school districts and Educational Service Units across Nebraska.

Specifically, included in the agreement are provisions for consultations and technical assistance, transition planning, coordinating the IEP and the IPE for roles and responsibilities amongst key individuals, and financial responsibilities, and procedures for outreach. The purpose is to coordinate and promote the cooperation of the programs and services available to students who are blind, deaf-blind and visually impaired during the transition process.

NDE is responsible for assuring that a free, appropriate public education, in accordance with federal and state laws, rules and regulations, to children with disabilities from date of diagnosis to age 21 or graduation. Local school districts and Educational Service Units operate under the structure of NDE and are responsible to fund the education of children with disabilities who are in that particular district. This may include direct provision of educational services in the district itself or at NCECBVI.

In the past, Nebraska Commission for the Blind and Visually Impaired (NCBVI) coordinated a statewide Transition Team for Students who are Blind, Deaf-Blind or Visually Impaired. The Team was comprised of NCBVI Counselors, Deputy Director for Vocational Rehabilitation Services, and

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NCBVI Executive Director; the Executive Director of the Nebraska Foundation for Blind Children; Director of the Nebraska Center for the Education of Children who are Blind or Visually Impaired (NCECBVI); WinAHEAD (Western Iowa and Nebraska Association on Higher Education and Disabilities); the Parent Training Institute (PTI); teachers for the visually impaired (TVIs); representatives from Nebraska Department of Education, Deaf-Blind Project and other entities for low incidence populations and special education.

The Team was established to promote and develop positive working relationships to assure that children with visual impairments, including multiple disabilities, are provided the best opportunities for education and for transition into adulthood and the world of work. A final work product of the Team is now provided to parents, educators, and other partners throughout the State of Nebraska. The tool, Opening Doors: A Transition Guide, provides a continuum of transitional services, recommended practices protocol for all the entities involved, descriptions and prescribed roles of each entity for children in different age groupings (from birth to adulthood). Training has been provided in various settings and will continue to occur as needed.

Opening Doors was developed using a facilitated process involving many stakeholders, including service providers, parents, and consumers. It serves to inform all involved about other components of the system, allow stakeholders to better understand each other, and to establish positive working relationships amongst the individuals and entities involved; including outreach to and referral of students with disabilities who are eligible for rehabilitation services.

Staff members of our agency collaborate with educators, parents, and other service providers on an ongoing basis, to assure that children who are blind and have additional disabilities, will receive high quality education and rehabilitation services in all parts of Nebraska. The NCBVI Executive Director is a member of the State of Nebraska Board of Education's Transition Advisory Committee. We collaborate with the Deaf-Blind Project, Parent Training Institute, WinAHEAD, Centers for Independent Living across the state, the Nebraska Center for the Education of Children who are Blind or Visually Impaired, and other entities providing services for children and youth in transition. Particularly in the Omaha and Lincoln School Districts, which have the highest populations and the most students experiencing vision impairments, NCBVI Counselors are systematic in outreach efforts to Teachers of the Visually Impaired. We meet with them in groups, present at TVI training events, and communicate individually with the educators. This effort will be expanded statewide to provide pre-employment transition services (PETS) to all eligible and potentially eligible individuals, and to help educators and employers learn about the PETS services available from NCBVI.

NCBVI counselors attend Individualized Education Program (IEP) meetings at school districts throughout the State of Nebraska when appropriate. NCBVI counselors initiate the process of developing Individualized Plans for Employment (IPE) when the young student and the IEP Team exhibit interest in participating in our group programs for blind youth. This occurs at least by age 16 and sometimes by age 14, as established by IDEA and the Rehabilitation Act. For Transition aged blind students who have not participated in NCBVI's transition programs, new policies have been written to ensure that the IPE is written before the student graduates or ages out of

educational services. The Counselor attending IEP meetings will initiate the process for application of vocational rehabilitation services and development of the IPE well before the student leaves the school setting.

Ongoing communication amongst NCBVI, educators, parents, and students, are an important strength to the overall transition efforts in Nebraska. NCBVI counselors and administrators will continue a process of educating educators and service providers about the services we provide to children who are blind.

Students of NCECBVI and those attending school in their local school districts also have the opportunity to participate in specialized NCBVI programs for children and youth. We invite educators to also attend and observe our programs for students. NCBVI youth programs are offered each year. The impact of the events is clear in terms of self-confidence, blindness skills, and elevated expectations. We can see qualitatively that many if not most adults who have attended such programs in previous years, are active, competent members of the workforce and their communities. NCBVI is working to acquire a data management system which will enable us to track results quantitatively as well.

Project Independence (PI) is a five-day summer program for pre-transition age students. PI provides counseling on attitudes about blindness, self-esteem building, recreational and social experiences. It enables students to develop and to utilize relevant skills in conjunction with the discussions and activities. The opportunity to be with other blind and visually impaired children is a vital factor to the success of the program participants.

Winnerfest retreats are offered once or twice per school year, from Thursday evening through Saturday noon. Transition aged students from across the state participate in the opportunity for fellowship with blind and visually impaired peers. The curriculum focuses on personal achievement, goal setting, and communication skills. Through videos, role play activities and group discussion, young people explore a variety of topics relative to their everyday lives and to their career aspirations. Participants have the opportunity to learn from and with each other about how to be competent and successful in all aspects of their lives.

WAGES (Work and Gain Experience in the Summer) is a summer employment program for students as they approach high school graduation. WAGES provides students with work experience, peer interaction, and the opportunity to enhance pre-employment and independent living skills. Participants are trained in job-readiness skills, perform actual jobs with businesses in the community, and practice the behaviors needed to maintain employment. WAGES also enhances entities within the workforce system, particularly those participating employers who learn the value of employees who are blind or visually impaired.

In FFY 2015, fifteen percent (15%) of VR funds and fifty percent (50%) of supported employment funds are committed to the provision of pre-employment transition services to blind and visually impaired students and youth in transition between 14 and up to but not including 22 years of age. To that end, a Transition Service Specialist was hired in September 2015 to strengthen the

partnership with educational institutions statewide with the objective of making a smooth transition from school to adult life and the world of work possible for more blind and visually impaired students and youth.

NCBVI staff members work with local Workforce Investment Boards and Youth Councils to inform them of the program and to develop the job opportunities for the young blind participants.

(e) Cooperative Agreements with Private Nonprofit Organizations

Most private non-profit vocational rehabilitation service providers in Nebraska do not specifically serve persons who are blind or visually impaired. Nebraska Commission for the Blind and Visually Impaired (NCBVI) does work cooperatively with such entities when specific client needs and interests dictate. In such cases, agreements are developed for the provision of relevant services.

Outlook Nebraska, Inc. (ONI) of Omaha is a private nonprofit providing employment and training that allow blind and visually impaired persons to achieve personal and career goals. NCBVI works cooperatively with ONI, Goodwill, and other service providers to serve mutual clients or consumers. In addition to services specific to individuals, NCBVI collaborates on various projects. NCBVI worked with ONI in providing cane travel instruction to all their employees. NCBVI worked with each of three work shifts to demonstrate appropriate cane technique and staff walked all through their work area and break area utilizing canes (Two Point Touch, Shore lining, Pencil Grip, Sighted Guide). Working with ONI management the goal is to make this an annual training event. Training was provided for ONI blind employees on Social Security Benefits, the benefits of earning SGA and understanding Social Security. Also being explored is a workshop on Tasks of Daily Living.

A collaborative project in 2013 was to develop public information materials about 'vision resources' in our area. The Coalition of Vision Resources: The partners are NCBVI, ONI, Radio Talking Book of Nebraska (RTBN), Nebraska Library Commission and Talking Book and Braille Services, Lions Clubs, Nebraska Academy of Eye Physicians and Surgeons, Nebraska. The NCBVI Omaha District Supervisor shared the work product at the state conventions of the Nebraska Academy of Eye Surgeons, Ophthalmologists, and Optometrists in 2013 and 2014.

NCBVI also partners with the Nebraska Foundation for Visually Impaired Children in the provision of assistive technology for blind and visually impaired children under 14 years of age on an ongoing basis.

(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

Nebraska Commission for the Blind and Visually Impaired (NCBVI) enters into cooperative agreements with other state agencies and providers of supported employment when specific clients are identified as candidates for those services. The agreements are based on a model utilized for the purpose of providing supported employment, including the assurance of long term services. The NCBVI Deputy Director for Client Services has lead responsibility for Supported Employment. He is the point of contact for the Nebraska Department of Health and Human

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Services-Division of Developmental Disabilities (NDHHS-DDD). NCBVI Field Supervisors and Vocational Rehabilitation Counselors typically identify providers of supported employment services and make the necessary contractual arrangements.

Each blind and visually impaired individual with a developmental disability has a case service coordinator employed by the NDHHS-DDD. The case service coordinator is responsible for leading a multi-disciplinary team in the development of an Individualized Program Plan (IPP) for mutual clients served by NCBVI and NDHHS-DDD. When supported employment services are involved, the IPP includes financial support provided by NCBVI and DDD. DDD pays for hourly rates charged by the supported employment service provider; NCBVI provides incentive payments at specific intervals (start of job search, start of employment, 30 days following the start of employment, stabilization, and 90, 180, and 270 days following stabilization). This arrangement is in accordance with the "milestones" model used by the Nebraska general rehabilitation agency to serve clients shared with NDHHS-DDD.

In FFY 2016, NCBVI will work towards establishing a similar partnership with the Nebraska Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) to extend supported employment services to blind and visually impaired clients with behavioral health disorders.

NCBVI collaborated with the Department of Education, Special Education and Vocational Rehabilitation (Nebraska VR Services) in the development of policies and procedures more clearly delineating the responsibilities of the different agencies and institutions involved and the scope and nature of services available to younger persons with disabilities in transition from school. The Collaborative Agreement between NCBVI, Department of Education - Special Populations, and the Nebraska Center for the Education of Children who are Blind or Visually Impaired, applies to persons who are likely to require supported employment or extended services in the future, as well as those students without this need.

(g) Coordination with Employers

The business community is a key customer for vocational rehabilitation. NCBVI professionals in all six offices have active approaches to reaching out to employers in their areas of coverage. NCBVI staff are engaged with the American Job Centers (AJC) and the WIOA state and local boards. In the metropolitan area of Omaha, NCBVI co-locates two VR Counselors at the local AJC.

VR Counselors and Supervisors are members of employer groups, or business networking organizations, as available in each area. These include local Chambers of Commerce, and other entities established for businesses to connect in a meaningful way.

Employers and Human Resource personnel of companies are invited to tour the Nebraska Center for the Blind. This gives them a chance to learn about the potential capability of blind persons as potential employees and to dispel misconceptions held by many people about blindness.

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VR professionals, including Counselors and Technology Specialists in particular are available to spend time at companies to assess the positions or openings, to identify if any accommodations might be needed and to provide information about the various technologies and adaptations that can facilitate employing blind and visually impaired persons in most every occupation.

Information is also provided about the resources available – some directly from NCBVI, such as paying for technology, or from external sources, such as tax supports or benefits to the employer as a result of hiring a person with a disability.

Transition services, including pre-employment transition services (PETS) for students and youth with disabilities are key to life-long successful employment of persons with disabilities. NCBVI has a strong emphasis on building the skills and abilities of blind and visually impaired youth, so that they will be successful.

The WAGES program is an example already in place, others will likely be developed pursuant to PETS requirements in WIOA. Work and Gain Experience in the Summer (WAGES) first focuses on identifying employers who will hire young clients for a nearly full-time job during the summer. Employers involved are encouraged to consider the youth as any employee, with high expectations for performance. NCBVI provides salaries to the clients and consultation and technology to the employers. This and other such programs are effective in the career success of the young clients; they are also instrumental in enabling employers to have direct experience with the benefits of hiring people who are blind. This promotes more opportunities for VR clients of all ages to achieve full-time integrated employment.

(h) Interagency Cooperation

NCBVI is very much focused upon clients achieving competitive integrated employment, to the greatest extent practicable. The agency will explore potentials for cooperation and collaboration with the State Medicaid plan under title XIX of the Social Security Act.

NCBVI collaborates with the Nebraska Department of Health and Human Services-Division of Developmental Disabilities services (NDHHS-DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired.

Efforts are in motion to establish a similar relationship with the Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH). Other mental health services are provided statewide by various entities. NCBVI personnel in each office cooperate with those providers to ensure that mutual clients, or persons who may need both VR and mental health services, will be adequately and appropriately served.

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

NCBVI staffing complement totals forty-nine point seven five (49.75) FTEs; forty-six full-time staff persons and five permanent part-time staff persons. NCBVI personnel include eleven (11)

vocational rehabilitation (VR) counselors; three Field supervisors and one Center supervisor; twelve (12) rehabilitation teachers (orientation counselors); six (6) program specialists (three in technology, one in older blind services, one in transition services, and one is in Nebraska Business Enterprises); and nine (9) vocational rehabilitation technicians.

There are also eight (8) administrative/business personnel including the executive director, two deputy directors, one business manager, one technology manager, two (2) Administrative Assistants, and one business office-time accounting clerk.

The Nebraska Business Enterprise (NBE) program consists of a Team: one Program Specialist (FT), one Accounting Clerk (PT), and part of the time of the VR Deputy Director and two people in the Business Office.

These positions are all included in the total agency staffing, mentioned above.

All NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind (CVRCB). Sixteen (16) staff members hold graduate degrees of a Masters or higher, including one Ph.D. and one J.D.

Staffing Levels and Projections

We project the total number of persons served by vocational rehabilitation (all statuses, from applicant through full services) during FY 2016 to total 560. The ratio of applicants and eligible individuals served to personnel will be 12.24 to 1. The current staffing level does enable NCBVI to provide core services to customers. Generally, the number of individuals served each year does not change a great deal.

When numbers of referrals increase, we work to find ways to effectively streamline our processes to enable us to continue meeting customer needs. Budgetary considerations and state regulations which limit personnel per agency prevent us from changing our staffing to any great extent. We do, of course, monitor services to assure that all core services are provided and that all active Individualized Plans for Employment are carried out in full. Policy and procedures are in place to implement Order of Selection should it ever be imminent. As stated, though, to date we are able to manage the number of personnel who will be needed by the Commission to provide vocational rehabilitation services to all eligible individuals.

During the next five years, we project that the number of individuals served including those with significant disabilities, will neither increase nor decrease significantly from the current level. We project vacancies during the next five years, based on potential retirement age and age of the individual, as follows: one (1) Executive Director, one (1) Deputy Director, one (1) Business Manager, one (1) Vocational Rehabilitation Counselor, three (3) Orientation Counselors, and three (3) Vocational Rehabilitation Technicians (support staff).

The plan is to consider the needs of the agency as people retire. When any vacancy occurs, we assess client needs statewide, to determine whether to change the staffing patterns. We may decide to move any vacant position to a different location in the State or to put the resources toward a different position.

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Vocational Rehabilitation Counselors	11	0	1
2	Vocational Rehabilitation Technicians	9	0	3
3	Orientation Counselors (Rehab Teachers)	12	0	3
4	Program Specialists (Technology, Transition, OIB, BEP)	6	0	0
5	Vocational Rehabilitation Supervisors	4	0	0
6	Deputy Directors	2	0	1
7	Business, Personnel, Other	7	0	1
8	Executive Director	1	0	1

There are no institutions of higher education in Nebraska that are preparing vocational rehabilitation professionals. The State law mandating standards for Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) enables NCBVI to hire, train and maintain qualified staff. This is especially important because there is no Master's degree program in Rehabilitation Counseling within Nebraska. It is extremely rare that our job candidates have a CRC, and rarely do applicants have a Master's Degree in Rehabilitation Counseling specifically. There are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)].

Row	Institutions	Students enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
1		0	0	0	0

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel

Currently, there are two vacancies for pre-existing vocational rehabilitation personnel at Nebraska Commission for the Blind and Visually Impaired. When vacancies occur within our VR positions, NCBVI recruits through local and statewide newspapers, State of Nebraska Personnel services, consumer organizations of blind persons, University graduate programs beyond our immediate geographic area, and related list-serves.

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As stated above, there are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)]. Nor are there any colleges or universities offering academic programs in vocational rehabilitation at the Baccalaureate or Graduate degree levels. Therefore, there is no coordination or facilitation of recruitment, preparation or retention efforts between the Commission and colleges or universities within Nebraska.

There are, however, some such graduate programs in the Midwest. NCBVI has contacted the university placement offices of nine institutions. All have indicated that they will post any job openings that we transmit to them. During 2014, we began to do this on a routine basis. The goal is to recruit recent graduates to apply for open positions with NCBVI in the future.

Non-Discriminatory Plan

NCBVI always strives to be non-discriminatory in hiring, retention, and promotion of staff from minority backgrounds and with disabilities. To recruit qualified personnel including those from minority backgrounds and those with disabilities, NCBVI follows federal Affirmative Action guidelines. We recruit via national consumer groups of blind individuals. To prepare and retain all personnel, including those from minority backgrounds and those with disabilities, the initial training and the ongoing training plan are individualized according to each person's specific training needs and also encompasses training issues that will maximize the agency's effectiveness and efficiency.

(3) Personnel Standards

Nebraska statute requires a State Certification for Vocational Rehabilitation Counselors for the Blind. This law is the highest standard in Nebraska for the discipline of rehabilitation counseling for the blind. All the NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind. Sixteen staff members also hold graduate degrees of a Masters or higher.

Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) is defined as a person who is certified to practice vocational rehabilitation counseling for blind persons and holds a certificate issued by NCBVI.

Vocational rehabilitation counseling for the blind is defined as the process implemented by a person who operates a comprehensive and coordinated program designed to assist blind persons to gain or maintain remunerative employment, to enlarge economic opportunities for blind persons, to increase the available occupational range and diversity for blind persons, and to stimulate other efforts that aid blind persons in becoming self-supporting.

The qualifications to be a certified vocational rehabilitation counselor for the blind in Nebraska are: (a) to have a bachelor's degree from an appropriate educational program approved by the NCBVI Executive Director; (b) to have completed six hundred (600) hours of immersion training under sleep shades (for persons with any functional vision) at the Nebraska Center for the Blind

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(operated by NCBVI); and (c) to have completed appropriate continued education training credits as approved by the NCBVI Executive Director.

The plan for training newly hired personnel who do not meet the established standards is as follows. New hires for VR Counselor positions must have the bachelor's degree (a) before hire. Training in the immersion setting (b), begins on the first day of the second week of employment. It continues for 600 hours of their employment, that is roughly four (4) months of work time. The time period allowed is sometimes extended if there are interruptions to the training, such as leave needed for illness, vacation, or sometimes meetings that must be attended, etc. The continuing education credits (c) are accrued over time and are reviewed every three years to qualify for certification renewal.

Intensive systematic immersion training of six hundred (600) hours is provided by NCBVI for all newly hired counselors, followed by three months of training specific to the individual's new position. This training provides an orientation to the agency understanding of blindness and the strategy of service delivery that grows out of that understanding. The training includes reading and discussion of many articles and documents in the blindness field, and skills training in non-visual techniques and technologies through hands-on experiences.

To a lesser degree, paraprofessional or support personnel also receive intensive pre-service training in the office where they will be working at the start of their employment.

Following Center Training, newly hired rehabilitation personnel continue with two to three months of on-the-job training activities for specific job duties including agency policies and procedures, accessing local resources, sensitivity training, social security, vocational counseling techniques, consumer group information, etc. The topics covered include a wide range of policies and procedures, counseling techniques, teaching modalities, etc.

Each Certified Vocational Rehabilitation Counselor for the Blind shall, in the period since his or her certificate was issued or last renewed, complete continuing competency requirements as set forth by NCBVI under the Executive Director's approval.

Annually, each employee and supervisor review performance and plan for individualized training. The goals include activities to enhance abilities in blindness skills, to refresh and deepen understanding of philosophical concepts, to expand professional knowledge within the field of rehabilitation counseling for the blind, and opportunities for training specific to rehabilitation counseling for specific positions. Discussions of philosophical issues are held in local offices and by the Administrative Team in Central office. Employees are also encouraged to spend time with other staff to learn new practices and to stimulate ongoing improvement.

(4) Staff Development

Supervisors have provided data regarding their subordinates' education, including degrees held. As mentioned above, the CVRCB Certification requirement is a Bachelor's degree approved by the Executive Director, and 600 hours of intensive training at the NCBVI Nebraska Center for the

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Blind. We encourage VR Counselors to pursue additional academic work. NCBVI has six offices across the State of Nebraska. Some of these locales are many hours away from colleges or universities with graduate programs relevant to this endeavor. Distance learning is an option for some parts of a degree program, but may not fulfill all requirements for such a program.

Many activities are conducted in the team setting. This enables mentoring of staff less experienced by those with more expertise in a particular area. Individual staff members may also schedule time with others to expand their own knowledge, skills and experience in areas needing to be strengthened.

One example that is proving to be highly productive is training in Motivational Interviewing (MI). The Nebraska Center for the Blind and each district have each scheduled sessions with MI trainers, to develop, expand, and fine tune the MI skills of NCBVI Counselors. These skills helped counselors build more positive working relationships with clients towards the achievement of individualized service goals and objectives.

NCBVI coordinates efforts with institutions of higher education, organized consumer groups and professional associations to recruit, prepare, and retain qualified personnel, including personnel from minority backgrounds, and personnel who are individuals with disabilities. Continuing efforts ensure that all personnel are adequately trained and prepared to meet standards that are based on the highest requirements in the State and to become certified in accordance with State Law. NCBVI also works to ensure the availability of personnel internally (or from external resources) who are, to the maximum extent feasible, trained to communicate in the native language or mode of communication of an applicant or eligible individual. Ongoing staff development activities will ensure that all NCBVI personnel receive appropriate and adequate training.

Funds from several segments of the NCBVI budget are committed to developing personnel, including funding training from the Nebraska Center for the Blind, as well as tuition and related expenses for expanding the capacities of NCBVI staff.

Ongoing training is made available to all staff on relevant and timely topics. Retaining qualified personnel is particularly important because of the investment we make with the intensive Center Training as well as our willingness to reimburse tuition for course work.

Topics of focused training sessions may include, but are not limited to:

1. laws and regulations, including the Rehabilitation Act, Randolph-Sheppard, the Workforce Innovation and Opportunity Act, Americans with Disabilities Act, Individuals with Disabilities Education Act, and others,
2. methods to help clients of all ages achieve successful employment in high-quality positions with benefits and opportunities for advancement,
3. using data to measure the success of concentrated efforts for achieving goals of high quality employment outcomes,

4. providing effective services to transition-aged persons who are blind or visually impaired, including approaches to outreach and service delivery;
5. ways to work effectively with the increasing number of older individuals who are losing vision but still want or need to be a part of the workforce,
6. serving persons with multiple disabilities, especially deaf-blindness,
7. assistive technology, including non-visual and low vision options,
8. maximizing effectiveness in the group training or counseling setting,
9. Social Security information, including benefits counseling and PASS plan development,
10. supported employment,
11. workplace policies,
12. positive philosophical understandings of blindness,
13. diversity awareness and sensitivity training, especially to working with people from poverty, and
14. additional relevant issues, e.g. transportation, crisis management, etc.

The long-range plan for ongoing development of staff is based upon needs identified by our annual processes for comprehensive statewide needs assessment. The plan is updated and kept current with ideas or issues identified from ongoing client satisfaction surveys, employee requests for additional training on specific topics, and internal data collection from the NCBVI data management system.

(5) Personnel to Address Individual Communication Needs

NCBVI has several employees across the State of Nebraska with bilingual skills in English and Spanish. Independent contracts are established as needed to obtain services from individuals who are able to communicate in the native language of applicants or clients who have limited English speaking ability or in appropriate modes of communication. Contracts have included, but are not limited to American Sign Language, including Tactile Signing for Deaf-Blind individuals, Spanish, French, Turkish, Arabic, Vietnamese, Burmese, Kareni, Swahili and others according to the needs of applicants and eligible individuals.

(6) Coordination of Personnel Development Under the individuals with Disabilities Education Improvement Act

NCBVI coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) in several ways. NCBVI and a team of educators and other stakeholders established a Protocol for educators and NCBVI counselors, for providing high quality services to blind and visually impaired children and youth in Nebraska. The handbook is titled Opening Doors: A Transition Guide. This tool serves as a vehicle for educating parents and families, service providers, educators, and others about the best way for children from birth through transition age, to obtain the education and rehabilitation services that will move them into adulthood successfully.

NCBVI provides information to educators and to VR personnel about training opportunities relevant to personnel development in the fields of both education and vocational rehabilitation.

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A series of personnel training sessions relating to the handbook were held in a coordinated effort between NCBVI and personnel covered by IDEA. In FFY 2014 and 2015, NCBVI Counselors continued to provide the tool, and instructions as needed, statewide to educators, parents, and other persons involved with educating blind and visually impaired school students within Nebraska.

Additional joint personnel development efforts will be held when specific issues of mutual concern are identified. For example, teachers of blind children from the public school system provide presentations to NCBVI at Staff Meetings. At the NCBVI Annual State Staff Meeting in 2013, a speaker from Nebraska Department of Education/Special Populations gave a presentation on the IEP process and the role of VR Counselors in that process, working with educators, families and students.

NCBVI staff members provide presentations at training sessions of the school system, university and college classes, and other opportunities which arise. We will continue to explore ways to assure success in education and quality employment. One avenue will be collaborating with the WinAHEAD organization (Western Iowa and Nebraska Association on Higher Education and Disabilities). On an ongoing basis, the primary emphasis will be individual communication between NCBVI counselors and parents, teachers and others in the education system.

(j) Statewide Assessment

Nebraska Commission for the Blind and Visually Impaired (NCBVI) is the Designated State Agency responsible under State law for operating the vocational rehabilitation program for the blind in Nebraska. A governing board, the majority of whom are persons who are blind or visually impaired, appointed by the Governor of the State of Nebraska serves to assure the agency is consumer-controlled. NCBVI undertakes to review and analyze the effectiveness of services and consumer satisfaction with services provided by the Commission, vocational rehabilitation services provided by other state, public and private entities, and employment outcomes achieved by eligible individuals receiving vocational rehabilitation services from NCBVI, to assure high quality, career track employment outcomes, with health and other employment benefits, wages comparable to state wages for non-disabled persons, and equity for persons of minority status.

<u>Formal Comprehensive Statewide Needs Assessment (CSNA)</u>

During FFY 2013, NCBVI established a contract with the National Research and Training Center on Blindness and Low Vision (NRTC), Mississippi State University Research Unit for a formal Comprehensive Statewide Needs Assessment to cover the period of 2011 through 2013. The assessment included surveys of blind clients closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi-structured interviews were conducted with other key informants. In addition, existing data from various sources was analyzed, such as the RSA-911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Data gathering began in March 2013 and continued through August 2013. Analysis was conducted primarily during the final quarter of Fiscal year 2013. The full report was provided to NCBVI early in fiscal year 2014.

A plan is in place to contract for a triennial assessment again in the upcoming period. The next Statewide Assessment will cover the period of FY 2015 through FY 2018.

NCBVI worked to understand and assess the study's results. Steps are being taken to move forward on the recommendations of the Comprehensive Statewide Needs Assessment.

Serving consumers with multiple disabilities is a need that grows in complexity and numbers. The agency will work to increase staff members' expertise in a variety of disabilities, including deaf-blindness, brain injury, and others. In addition, it is important to partner with other entities specializing in serving persons with specific disabilities other than blindness. There is a need to increase competitive employment outcomes for clients with multiple disabilities. Caseloads were reviewed to identify clients with multiple disabilities and strategies were developed to more effectively provide the services needed by those individuals.

The population of Nebraska is not tremendously diverse in terms of race and ethnicity, but diversity has been increasing. The agency has a Minority Outreach Plan to assure that contacts are made systematically in every area of the State. The CSNA results show that there is a need to analyze the work being done. It is important to make meaningful contacts with diverse populations, to effectively reach persons who might be eligible for agency services. Materials are being revised to have different languages available, including print, online, and video productions for public use. A translation tool was added in 2014 to the agency website, allowing the user to read all content in a wide range of language options.

There is a need to increase the proportions of people served from minority populations who achieve competitive employment outcomes. The efforts to date have focused on increasing outreach to all Nebraskans. This effort will continue, along with examination of barriers that inhibit successful outcomes. Efforts statewide assure that regardless of race or ethnicity, quality services are provided at referral, application, and throughout the VR process.

Assistance related to employment is another identified need. The needs can be broken into three major areas: career exploration and guidance, searching for and obtaining employment, and working with employers on accommodations and other on-the-job requirements. More specifically, the needs include help with finding a job, finding job leads or contacting employers, working with employers on job accommodations, completing applications, exploring career options, and developing clients' skills for seeking and obtaining competitive employment.

The world of work and life in general require increasing needs for technology related skills and equipment. The highest focus of need from consumer surveys was in this area. Training in access technology is an area of high need, according to the assessment. This is consistent with our ongoing needs assessment with consumers statewide, described below, which we conduct every year. Employers surveyed also indicated that assistance with technology will help them to hire and retain employees with vision impairments. The Technology Team, led by a Program Manager, works to enhance their own expertise, to train other staff, to provide opportunities for training consumers, and to identify additional opportunities available from external resources.

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Another area identified is the importance of partnering with other organizations, agencies, groups, etc. In particular, other components of the statewide workforce system are key entities with whom to partner. Much is done and will continue to be done throughout the state. Staff members in each geographic area are encouraged to engage in networking opportunities with businesses in their locale. We engage with the Local Workforce Boards in all parts of the State. This helps to assure that we do have knowledge of and interaction with other components of the workforce system statewide. When staff members learn of new entities, or ones that have not worked with NCBVI in the past, the information is shared with other staff and consumers who need it. This agency is strongest when collaborating with and learning from people and groups that may have resources beyond its own.

With the exception of Omaha and Lincoln metropolitan areas, most of the state is rural. There are small and medium-sized towns sprinkled across the state. Still it is critical that we work to ensure our ability to achieve competitive employment outcomes for clients living in rural Nebraska. NCBVI data show that the rates of acceptance for services and competitive employment are actually slightly better for rural-based clients than for urban. However, there may be a perception amongst individuals who feel isolated and unable to connect with employment, leading to a sense that this is an unmet need. It is also not unusual for VR Counselors in the rural areas to be frustrated by limited employment opportunities for their clients. The fact that this need emerged as critical in the survey reinforces the need to strengthen networking efforts, outreach to potential clients and employers, and building skills among agency staff to make sure that all areas of the state are served fully, including rural, urban, and metropolitan.

The Comprehensive Statewide Needs Assessment also identified some rehabilitation needs of individuals. The top five include instruction using computer assistive technology; training in assistive technology; instruction on low vision aids or devices; cane travel; and exploring career options. Specific to minorities, there may be vocational rehabilitation needs that are different or that need special attention. The top three needs were the same as the general listed above, but also included here are a need for instruction in general and personal home management; help in exploring career options. The only minority group that appears to be underserved by this Assessment are persons of Hispanic origin. One salient point being considered is that population figures for the State include citizens and non-citizens of a variety of immigrant statuses. Our services, as required by State Law can only be provided to persons who are citizens or of qualified immigrant status. Thus, comparing proportions of persons served with proportions of persons present in the state can be misleading.

For the effort to establish, develop or improve community rehabilitation programs (CRPs), NCBVI collaborates with a wide range of community partners statewide, working together to develop and improve services. NCBVI is an active partner with the Statewide Independent Living Council (SILC). As part of the State Plan for Independent Living, to assure that IL services are available statewide, NCBVI provides 15.5% of the budget for Panhandle Independent Living Services (PILS). This funding is likely to discontinue at the end of FFY 2017 when a new SPIL goes into effect.

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Job coaching to Supported Employment clients is provided through contracts with community rehabilitation programs. Agency staff members also work with CRPs and independent living centers to assure that services are coordinated and meeting the needs of Nebraskans with disabilities, especially those who are blind or visually impaired along with multiple disabilities.

NCBVI partners with community rehabilitation programs (Outlook Nebraska, Goodwill, Martin Luther Homes, Community Alternatives of Nebraska, Quality Living) and other entities. Outlook Nebraska, Inc. (ONI) of Omaha is a private nonprofit providing employment and training that allow blind and visually impaired persons to achieve personal and career goals. NCBVI works cooperatively with ONI and other service providers to serve mutual clients or consumers. In addition to services specific to individuals, collaboration on other projects occurs as the need and opportunity arise.

The activities enable NCBVI to inform many persons about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. The agency website is updated continuously and provides information to the public about available services and resources, avenues to apply for services, and ask questions, and so forth. Work is being done to enhance a social media presence with information and updates about NCBVI events, activities, and services.

The agency collaborates with the Nebraska Department of Health and Human Services-Division of Developmental Disabilities services (NDHHS-DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired. Efforts have been initiated to establish a similar relationship with the Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) on behalf of blind and visually impaired clients with behavioral health issues. For the most part, job coaching to SE clients is provided through contracts with community rehabilitation programs. DDD provides ongoing funding for the job supports. Contracts with CRPs and coordination for services all serve to expand, develop and improve such programs across the State of Nebraska.

Part of the Comprehensive Statewide Needs Assessment gathered information regarding this question, from the staff survey and the key informant interviews. One item on the staff survey addressed this, and staff did not consider establishing or developing CRPs within the state to be an important need. This was the lowest rated item for staff in terms of need, with 64.7% indicating there was limited or no need to do this. Four of the key informants indicated they did not know or preferred not to provide an answer about this need. One informant did not see a need to establish CRPs, while another commented on the fact that there are no other organizations in the state which can provide blindness rehabilitation services. Only one key informant felt there is a need to establish additional CRPs, although this was from the perspective of providing a source of employment for consumers rather than from the perspective of providing rehabilitation services to consumers. Overall, the results would indicate that most do not consider the establishment or development of CRPs to be an important need for blind consumers in Nebraska. The only information that supports a need is that two key informants thought that

there is a need for other service options (beyond NCBVI providing all services). The fact that NCBVI currently partners with community programs to identify and to address consumer needs may be the reason that developing further such programs is not seen as a high-level need.

Ongoing Efforts for Needs Assessments

Throughout each year, NCBVI conducts comprehensive, statewide assessments on an ongoing basis in a number of different formats and settings. Throughout each year, NCBVI holds public forums to elicit opinions and comments from consumers regarding the services currently being provided and the needs of consumers that are not being addressed. In some cases, the sessions are conducted jointly with other providers including the general vocational rehabilitation agency, centers for independent living, education, health and human services, etc. Other forums are conducted as a part of our presentations to statewide meetings of consumer or peer support groups of the blind: National Federation of the Blind of Nebraska, American Council of the Blind of Nebraska, Nebraska Association of the Blind, and other more local groups. The NCBVI Board of Commissioners holds quarterly public meetings during which they encourage consumers and interested persons to make comments and suggestions.

Consumers are informed that the current NCBVI State Plan is posted on the website and is otherwise available to anyone requesting a copy in alternate format. The public meetings serve as focus groups to solicit consumer input. The event locations and logistics are scheduled to best elicit input from and ideas about the needs of persons with the most significant disabilities, disabled individuals of minority or ethnic background, areas that may be underserved, and those who may be served by other entities such as the Nebraska Workforce System or other partner entities.

During Federal Fiscal Year 2015, NCBVI held or participated in forums in the following Nebraska locations: Omaha, Lincoln, North Platte, and Norfolk. The consumer-controlled Commission Board handles all functions delegated to a State Rehabilitation Council, with added responsibility for governance in accordance with State Law.

Notes are taken at each forum or meeting to track consumers' ideas. Following such sessions, action is taken to explore ideas to determine what will help to improve services provided by NCBVI and when appropriate and possible, to implement new strategies. Frequently, the same types of comments are made; some of which may not have any real way to address as a vocational rehabilitation agency. It is very common for individuals at public forums to have questions specific to services, thus generating referrals. A follow-up response connects the person with NCBVI staff in their area.

The Client Assistance Program provides a report on cases received throughout the year to the Administrative team and Supervisor's team. Cases are reviewed for systemic issues and any current trends about services to clients.

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Assessment tools are utilized throughout each year to evaluate service effectiveness. Doing so adds depth to the ongoing statewide needs assessment, as the service evaluations may point to unmet needs not articulated in the more public settings.

In October 2015, a new online client satisfaction survey conducted by Gemini Research and Training (GRT), a private contractor, was initiated to assess the level of satisfaction of vocational rehabilitation clients in statuses 18, 20, 26, and 28. At the same time, online surveys of students of the Nebraska Training Center for the Blind began. For those who cannot fill out the survey via the internet, GRT follows up with a telephone call to assist clients with the survey. Surveys explore the client's perspectives about various aspects of NCBVI services and Center training. Results are shared with the NCBVI Executive Director and Deputy Director of Client Services, appropriate NCBVI personnel, and the Board of Commissioners. In general, most clients are satisfied or enthusiastically positive with the services they received. Occasionally, problems are mentioned. When this occurs, the Deputy Director of Client Services and the Center or field supervisor follow up to address identified problems. These comments help to assure quality services, correct any problems not discovered earlier, and to work on continuous improvement. Person surveyed are assured that their comments are confidential and that they will be used to help evaluate and improve services provided to blind Nebraskans. For current clients, assurance is given that any comments will not impact their service in a negative way; rather, that it will assure that their needs are being met.

Another assessment tool is a basic satisfaction survey, mailed to all independent living clients after case closure. The vast majority of respondents say that the services they received were excellent. Some make no comments at all. It is rare that we receive negative responses on these surveys. These surveys are also confidential. If the individual does include their name, and if they have any questions or negative comments, a follow-up contact is made to determine whether it is appropriate for any additional service delivery to address the unmet need. If no name is given, but negative comments are made, we discuss and remind all counseling staff of issues to which they need to be sensitive. Assessments from persons served through the Independent Living (IL) services also help to assure that the ongoing statewide assessment is comprehensive. The IL track sometimes leads to a person applying for Vocational Rehabilitation services; thus assessing IL services is linked to the overall comprehensive statewide assessment.

(k) Annual Estimates

NCBVI projects the total number of persons served by vocational rehabilitation (all statuses, from applicant through full services) during FY 2016 to total 560. The ratio of applicants and eligible individuals served to personnel will be 12.24 to 1. The current staffing level does enable NCBVI to provide core services to customers. Generally, the number of individuals served each year does not change a great deal.

When numbers of referrals increase, the agency identifies ways to effectively streamline processes to enable the staff to continue meeting customer needs. Budgetary considerations and state regulations that limit personnel per agency prevent us from changing our staffing to any great extent. Services are monitored to assure that all core services are provided and that all

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active Individualized Plans for Employment are carried out in full. Policy and procedures are in place to implement Order of Selection should it ever be imminent. As stated, though, to date there are adequate personnel to provide vocational rehabilitation services to all eligible individuals.

During the next five years, it is projected that the number of individuals served including those with significant disabilities, will neither increase nor decrease significantly from the current level. Projected vacancies during the next five years, based on potential retirement age and age of the individual, are as follows: one (1) Executive Director, one (1) Deputy Director, one (1) Business Manager, one (1) Vocational Rehabilitation Counselor, three (3) Orientation Counselors, and three (3) Vocational Rehabilitation Technicians.

(I) State Goals and Priorities

Nebraska Commission for the Blind and Visually Impaired (NCBVI) is an independent, consumer-controlled Commission. As such, it does not have a State Rehabilitation Council. A Board of Commissioners governs NCBVI, the majority of whom must be blind consumers. Until last year, all Commissioners appointed by the Governor of the State of Nebraska have been individuals who are blind or visually impaired. There is now an appointed Commissioner who is the parent of a blind young adult. The Board of Commissioners works together with the agency Executive Director to develop and agree to annual goals and priorities. The mission of NCBVI is "Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind." The agency's primary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals for competitive employment (including supported employment). The secondary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals to live independently, and to be full participants in their communities. With both priorities, agency personnel work with clients to elevate their personal goals beyond what they might have expected a blind person to be able to achieve. As people learn to understand blindness and learn to utilize the alternative skills of blindness, they develop self-confidence and determination to establish personal goals that embody elevated expectations for themselves and for their future. NCBVI goals are based on factors identified through analysis of the comprehensive statewide assessments, both the contracted research project and the ongoing public forums, and results of federal RSA Monitoring and oversight.

1. Increase the number and percentage of clients achieving competitive employment outcomes.

2. Increase the rehabilitation rate for transition aged clients achieving competitive employment outcomes.

3. Improve the quality assurance system.

Many approaches are in place to achieve the goals and priorities of achieving high-quality successful employment for clients, including those of transition age. Each situation is

individualized, thus the strategies and solutions for each client is unique. This approach is productive in itself. It also helps to model for the individual that throughout life, one can accomplish new things by thinking creatively and having the confidence to try new things. The overall priority of high-quality employment includes the traditional working age client, persons in transition from school to work, persons with multiple disabilities (e.g. Deaf Blind) or other special needs (e.g. Supported Employment candidates). Older applicants or persons who express interest in Independent Living (IL) programs are encouraged to explore vocational rehabilitation in addition to IL services. Clients of all ages are encouraged to examine whether, if not for blindness, he or she would still be in the workforce. If so, counselors help individuals to understand blindness and to raise personal expectations and aspirations. This process often does lead to employment goals for individuals who otherwise would not have believed it possible to be employed as a blind or visually impaired person.

The system of Standards and Indicators established by RSA has been the primary benchmark used to measure the extent to which program goals were achieved and as a result, the effectiveness of the overall program. Additional evaluation processes are described in detail in the section on Supported Employment Goals. The primary goal for the SE Program is to develop supported employment situations for persons who experience the additional involvement of a developmental disability. When competitive employment without ongoing support is not an option, particularly for individuals with developmental disabilities in addition to blindness, supported employment is explored as an option that may be more conducive for that individual. An agreement with the Nebraska Health and Human Services System provides the expertise and resources, including ongoing support, to develop and sustain individualized services. Each individual with a developmental disability has a case manager service coordinator, employed by the Nebraska Health and Human Services, Division of Developmental Disabilities (NHHS-DDD). The case manager is responsible for developing an Individual Program Plan for each client. The Plan normally includes provision for ongoing support from DDD when supported employment is involved. NCBVI generally works with the client (or supported job coaching) for 90 days after stabilization. Using the milestones system; the client remains in active status for about a year after employment. Arrangements are made on a case-by-case basis and mirror the approach in place between the Nebraska general agency (VR) and NHHS-DDD. There are also some persons who could benefit from ongoing support, but who do not have developmental disabilities. For the most part, these individuals have traumatic brain injuries or mental health issues with the onset of disability occurring after age 21. NCBVI works to enhance the potential to achieve employment outcomes in cases that often require maximizing resources and creativity. SE funds are also utilized for training of clients who are Deaf-Blind or have other multiple disabilities. As appropriate, some clients are sent to the Helen Keller National Center (HKNC) for intensive training, not available in Nebraska. In recent years, there have been more Deaf-Blind individuals who have personal goals to become employed, who qualify for Supported Employment and for whom Supported Employment is indicated. In addition to the actual job coaching and ongoing supports, it is crucial for such individuals to enhance their capabilities for productive lives.

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(m) Order of Selection

At present, NCBVI is not under an Order of Selection. Policy and procedures are in place to implement Order of Selection should it ever be imminent.

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

The primary goal for the Supported Employment (SE) program of NCBVI is to develop appropriate individualized SE placements for blind and visually impaired persons with developmental disabilities. It is also the goal of NCBVI's SE program to develop appropriate individualized SE placements for blind and visually impaired persons with significant secondary disabilities including brain injury, mental illness, hearing impairment, or other multiple disabilities occurring after consumers have reached the age of 21. Each blind and visually impaired individual with a developmental disability has a case service coordinator employed by the Nebraska Department of Health and Human Services, Division of Developmental Disabilities (NDHH-DDD). The case service coordinator is responsible for developing an Individualized Program Plan (IPP) for mutual clients served by NCBVI and DDD. When supported employment services are involved, the IPP includes financial support provided by NCBVI and NHHS-DDD. NHHS-DDD pays for hourly rates charged by the supported employment service provider; NCBVI provides incentive payments at specific intervals (start of job search, start of employment, 30 days following the start of employment, stabilization, and 90, 180, and 270 days following stabilization). This arrangement is in accordance with the milestones model used by the Nebraska general rehabilitation agency to serve clients shared with NHHS-DDD. The NCBVI Deputy Director described the milestone model as applicable to NCBVI clients at a statewide gathering of 30 local field office supervisors coordinated by NHHS-DDD in November 2012. The NCBVI Lincoln district supervisor and vocational rehabilitation counselors and the NCBVI Deputy Director for Independent Living Services also met with NHHS-DDD supervisors and case service coordinators from various local field offices in southeastern Nebraska, and work continues to establish working relationships with NHHS-DDD local field offices in other parts of the state. One supported employment case has been closed successfully since the milestones model was initiated. Some blind and visually impaired persons with non-developmental disabilities, primarily those with traumatic brain injuries, mental health issues, or other significant disabilities occurring after age 21 might benefit from supported employment services; however, state funding for support extending beyond eighteen (24) months to such persons is not available in Nebraska. In such cases, the Deputy Director, Supported Employment Administrator, works with the NCBVI Counselor involved to identify possible resources for the ongoing support (i.e., PASS plans, natural supports, personal resources). Continued training regarding Supported Employment services is provided to NCBVI counselors, statewide. The total funds projected for FY 2016 is expected to be $30,000. At least 50% will be allocated to persons in the pre-employment transition services categories. Concerted efforts will assure efficiency so that the limited funding will be as effective as possible. As appropriate, additional funding will be available from Title I funds. SE services were provided to 20 clients in FY 2015; it is feasible that the number served in 2016 will be 25. Overall, NCBVI Management staff work to implement creative strategies to most effectively utilize Supported employment funds to maximize the benefit for those individuals in the program's target population.

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Project SEARCH is a joint effort between NCBVI, VR (NE-G), school districts, hospitals and other businesses in several communities. Project SEARCH is not specifically supported employment, but it is designed to benefit people with developmental disabilities in transition. Additional Project SEARCH programs were added during the past year. These partnerships between NCBVI, VR, schools and businesses are expanding. New projects include a major hotel and hospitals. Outreach to transition aged persons with multiple disabilities will enable us to identify youth who are appropriate for this opportunity and to provide the vocational preparation and experience that will serve them well into adulthood.

(o) State's Strategies

Nebraska Commission for the Blind and Visually Impaired are to increase the number and percentage of clients achieving competitive employment outcomes; increase the rehabilitation rate for transition aged clients achieving competitive employment outcomes; and to improve the quality assurance system. NCBVI utilizes strategies identified in the text above and in WIOA to achieve these goals and priorities, to support innovation and expansion activities, and to overcome barriers to accessing NCBVI's vocational rehabilitation and supported employment programs.

There are six physical offices throughout the State of Nebraska, to reach blind and visually impaired persons in their home communities. Vocational Rehabilitation staff travel their catchment areas to meet with referrals and clients, to educate the general public, including employers, and to reach out to individuals who may need our services. There is an increasing emphasis upon providing effective services to the transition population, particularly pre-employment transition eligible persons. From the RSA perspective, as well as this agency, it is crucial to increase successful outcomes for clients who begin rehabilitation services from the age of 16 (or 14 where appropriate) through age 24. NCBVI closely reviews all transition cases closed without achieving employment outcomes. Through this process, approaches and services are analyzed, to determine how successes for transition clients can be increased. At the same time, case reviews are conducted on all transition cases closed that did achieve employment outcomes. The level and types of services provided and the success achieved are examined based upon benchmarks established by RSA and WIOA common measures, to be determined. Workshops are provided in various locations around Nebraska to spotlight the capabilities of blind individuals. The agency partners with other agencies, consumer organizations, communities, and groups; including Disability Rights Nebraska, Nebraska Assistive Technology Partnership (ATP), the Statewide Independent Living Council, Workforce Development Councils, educational entities, hospitals, multi-cultural centers, community rehabilitation programs (Goodwill, Martin Luther Homes, Community Alternatives of Nebraska, Quality Living), and a wide range of other entities. The activities enable NCBVI to inform many persons about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. The agency website is updated continuously and provides information to the public about available services and resources, avenues to apply for services, and ask questions, and so forth. In 2016, the employment conferences for clients will be continued. The conferences are an effective approach to expand and improve efforts to secure high quality employment outcomes for job

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ready consumers and to enable pre-employment services clients to gain skills and resources for achieving employment. Included in the conferences are motivational speakers, sessions on resume writing, interviewing and related skills, technology demonstrations, mock interviews with local business people, and a job fair with local businesses present. Employers have an opportunity to meet blind job candidates in a setting conducive to exploring the options for both blind consumers and for business representatives. Clients learn and practice many skills necessary to succeed in the world of work. Instructional videos developed and produced by NCBVI are now being used by clients, for self-study on blindness skills, between appointments with Rehabilitation Counselors and Teachers. Over the past several years, staff training included intervention strategies promoting greater effectiveness working with people with Traumatic Brain Injury, Deaf-Blindness, autism, and other significant disabilities. These activities will enable more blind consumers to obtain employment and to be full participants in their families and communities. Every year, NCBVI conducts comprehensive, statewide assessments on an ongoing basis. Throughout each year, NCBVI holds public forums to elicit opinions and comments from consumers regarding the services currently being provided and the needs of consumers that are not being addressed. In some cases, the forums are conducted jointly with other providers (e.g. the general vocational rehabilitation agency, centers for independent living, education, health and human services, etc.). Other forums are conducted as a part of our presentations to statewide meetings of consumer or peer support groups of the blind: National Federation of the Blind of Nebraska, American Council of the Blind of Nebraska, Nebraska Association of the Blind, and others. The NCBVI Board of Commissioners also holds quarterly public meetings during which they encourage consumers and interested persons to make comments and suggestions. In addition to the ongoing work to hear from the public about services and needs, we now have the results of the formal Comprehensive Statewide Needs Assessment, completed in FFY 2014. The results are consistent with our less formal, ongoing assessments, validating the information that is received from both approaches.

Consumers are informed that the current NCBVI State Plan is posted on the website and is otherwise available to anyone requesting a copy in any format. The forums serve as focus groups to solicit consumer input. The event locations and logistics are scheduled to best elicit input from and ideas about the needs of persons with the most significant disabilities, disabled individuals of minority or ethnic background, areas that may be underserved, and those who may be served by other entities such as the Nebraska Workforce System or other partner entities. The following strategies work toward achieving the third goal (Improve the quality assurance system): each fiscal year, a percentage of Title I funds are used to develop and implement innovative approaches to expand and improve services. During recent years, Innovation and Expansion funds were allocated to further our ability to manage data systematically. The NCSAB data management system, eForce, has been live since April 9, 2009. Each year, training sessions were conducted for NCBVI personnel to operate the system, both inputting data and accessing information. Additional programming and training efforts were required to fully utilize the system, on an ongoing basis as the system was developed and refined.

As with any data management system, facets needing to be fine-tuned have become evident. The programming and training costs have been funded with a combination of Title I Innovation

and Expansion and Social Security Reimbursement funds. Day to day enhancement of the system and provision of the service are specific areas for which resources are needed. New, major additional requirements from RSA for 911 data collection have been implemented, relating to medical coding and other reporting elements. The new regulations, pending further regulations related to WIOA, and an effort to link system with the State of Nebraska fiscal system has led to the decision to purchase a proprietary data system. NCBVI is in the process of a Request for Proposals for competitive bid. This should generate proposals from major software entities for consideration. Plan for starting with a new system is projected at October 1, 2016. Work with the data management system will address all goals. Data management will enable NCBVI to analyze the effectiveness of all parts of the system. These can then be used the data based results to add value to overall efforts of the agency, achieve established goals, and to identify future needs and challenges.

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals

The mission of Nebraska Commission for the Blind and Visually Impaired (NCBVI) is "Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind." The Commission's primary priority is to enable persons who are blind and visually impaired, including those with multiple disabilities (i.e., hearing impairment, brain injury, mental illness) to achieve their individual goals for competitive employment (including supported employment). A secondary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals to live independently and to be full participants in their home communities. Particular emphasis is given to the provision of pre-employment transition services to blind youth ages 14 years and up to but not including age 22.

NCBVI goals are based on factors identified through analysis of comprehensive statewide assessments, the contracted research projects, and ongoing public forums.

2016 State Plan program goals for NCBVI are extensions of the goals identified on the 2014 State Plan:

(Goal 1) Increase the number and percentage of clients achieving full-time (31+ hours per week) competitive employment outcomes.

Fifty (50) VR clients were closed in Status 26 during FY 2015, indicating that employment goals were achieved, compared to seventy-two (72) in FY 2014. In FY 2015, 54% of cases closed in Status 26 achieved full-time employment, compared to 52.77% achieving full-time employment in FY 2014. Our goal specifically focused on employment with more than 31 hours per week. While the goal of increasing the percentage of status 26 closures achieving full-time employment in FY 2015 was met, the goal of increasing the number of status 26 closures achieving full-time employment in FY 2015 was not.

(Goal 2) Increase the ratio of average hourly earnings of clients who become employed compared to average earnings in the state.

The average hourly wage of cases closed in status 26 during FY 2015 was $15.08. Using the most recent Department of Labor (DOL) estimates for the average overall hourly wage for Nebraska in

the 2nd quarter of 2015 ($19.99), the ratio of average hourly wage of cases closed in status 26 with DOL estimates is .75. The average hourly wage of cases closed in status 26 during FY 2014 was $15.67. Using DOL estimates for the average hourly wage for Nebraska at the end of FY 2014 ($19.69), the ratio of average hourly wage of cases closed in status 26 with DOL estimates of the average overall hourly wage in Nebraska is .79. Goal number 2 was not met.

(Goal 3) Increase the rehabilitation rate for transition aged clients in FY2015 over the previous fiscal year.

The rehab rate for transition-aged clients in FY 2015 was 45.45%; in FY 2014, it was 28.57%. Goal 3 was met.

NCBVI is committed to the provision of rehabilitation services to blind and visually impaired children and youth and their families as early as possible in the child's development. Special programs such as Project Independence for children between the ages of five and fourteen stress the importance of self-confidence and independence using the alternative skills of blindness. Programs for blind and visually impaired teens such as WAGES (Work and Gain Experience in the Summer) and Winnerfest provide valuable work experiences and opportunities for developing interpersonal skills needed for success in later life. Other programs such as technology fairs and the College Workshop also help blind and visually impaired students make the transition to life after high school. In the coming year, NCBVI will increase efforts promoting more job opportunities for blind and visually impaired youth in their home communities throughout the school year.

In September 2015, NCBVI hired a Transition Services Specialist to strengthen the relationship between NCBVI and schools statewide on behalf of blind and visually impaired students. Fifteen percent (15%) of funds allocated to NCBVI for vocational rehabilitation services are dedicated to providing pre-employment transition services to blind and visually impaired youth between the ages of 14 and up to but not including 22; 50 percent (50%) of funds for supported employment services are committed to providing pre-employment transition services to blind and visually impaired youth in the same age group.

Increasing the number of blind and visually impaired youth in transition achieving their individual employment goals is a major objective for NCBVI in FY 2016. Transition-aged clients are encouraged to elevate their expectations for personal achievement. This can translate to higher education, often delaying their ultimate employment. It may take more years to reach that goal, but when they do, it will be in a career that will pay well, have benefits, and the chance for promotions. We are in the process of examining all 28 closures, including those for Transition clients. We will determine if there is any difference between those who choose to continue their education and those who do not. We also will explore any commonalities among cases closed unsuccessfully. There may be strategies which can be used to improve the employment outcomes and the resulting rehab rate.

(4) Improve the quality assurance system.

In October 2015, NCBVI issued an RFB requesting bids to replace the client database management system, eForce, to a system that will be more comprehensive and effective on all levels of the process, such as establishing electronic reminders of service deadlines; ways for staff to communicate with each other about client needs and case service activities; mechanisms for administrators to review work that is done, accomplishments made, and to assess gaps in either the data management system itself or the agency's service delivery system. As there is more time using the new system, the Commission will be better able to track effectiveness of programs and in other ways, assure that high quality services are provided to accomplish successful outcomes for clients.

To achieve the goals and priorities of achieving high-quality successful employment for clients, NCBVI is using many approaches. Each situation is individualized, thus the strategies and solutions for each client is unique. This approach is productive in many ways. It helps each individual client to clarify personal goals and then to achieve those goals. It helps to model for the individual that throughout life, one can accomplish new things by thinking creatively and having the confidence to try new approaches. It also helps rehabilitation staff by reinforcing creative, individualized thinking, which in turn stimulates creative thinking for the next client who walks in the door.

Clients are encouraged to examine whether, if not for blindness, he or she would still be in the workforce. If so, counselors help individuals to understand blindness and to raise personal expectations and aspirations. This process often leads to employment goals for individuals who otherwise would not have believed that they could be successful in the job market as a blind or visually impaired person.

NCBVI has developed workshops for clients that give a jump-start toward competitive employment. They also serve to educate business people about the features and benefits involved with hiring blind job candidates, the capabilities of blind individuals, and technology related to blind persons in the workplace. These events have been highly effective in the short term and are expected to garner additional benefits over time.

During FY 2015, NCBVI entered into a contract with Abilities Fund, a private non-profit organization specializing in training for people with disabilities in preparation for self-employment. It is expected that this partnership will expand self-employment options for more blind and visually impaired consumers.

The upturn in the national economy over the past couple of years has created a more favorable labor market; however, there are still pressures which make getting a job more difficult for individuals who are blind or visually impaired. It is hoped that the overall economic situation in Nebraska and across the country will continue to improve during 2016.

Every year, NCBVI evaluates the effectiveness of its vocational rehabilitation program in several different ways; using data and input from Rehabilitation Services Administration (RSA), employers, consumers and the general public, staff members, the Client Assistance Program, and

private or other public entities with whom the agency collaborates. Most important, service recipients are asked for their evaluation of services provided at several stages of their program.

The needs of Nebraskans who are blind or have visual impairments are identified on a statewide basis through public forums and meetings, surveys of clients after completion of Center training, after case closure, and changes at statuses 18 and 20. There is ongoing communication with the NCBVI Governing Board of Commissioners (four of five of whom are blind) and the agency's accessible website. Work continues with the resultant feedback, to best address identified needs and to modify procedures for the future. The public forums held throughout the year continue to confirm and reinforce findings of that formalized needs assessment.

In 2013, NCBVI initiated a contract for a statewide needs assessment with the National Research and Training Center on Blindness and Low Vision (NRTC), Mississippi State University Research Unit. The assessment includes surveys of blind clients who were closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi-structured interviews were conducted with other key informants. In addition, existing data from various sources were analyzed, such as the RSA-911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Some of the more important research findings of the statewide needs assessment issued in FY 2014 were as follows:

Services to consumers with multiple disabilities

Several data sources indicated that services to consumers with multiple disabilities need improvement. According to the RSA-911 analyses, consumers with multiple disabilities were competitively employed at a significantly lower rate after receiving services than other consumers. In the consumer survey, respondents who had multiple disabilities reported a greater need for services in many areas compared to those with blindness or visual impairment only. In terms of services for which a need remained after the completion of their rehabilitation program, respondents with multiple disabilities had similar or higher remaining needs in all areas. They reported a higher remaining need (compared to those without multiple disabilities) in 47.4% (n=9) of the services asked about. Almost all staff (94.7%) indicated that improving services to consumers with multiple disabilities was a moderate or critical need. This item had the fewest number of people who did not consider it a need (only one staff person rated this as limited or no need). Four of the eight key informants identified persons with multiple disabilities as a group that was unserved or underserved by NCBVI. One key informant mentioned that counselors tended to not have knowledge about other disabilities, and there was a need for them to have this knowledge in order to serve this group appropriately.

In terms of suggestions by participants about how to better serve this population and meet their needs, four key informants indicated that it is important for NCBVI to partner with other agencies or organizations that have some expertise with the additional disabilities of this group. Three staff members mentioned that additional training or professional development about other disabilities was needed, and two staff members suggested partnering with other professionals or organizations that have expertise with other disabilities.

Services to minorities

Several data sources also indicated that services to minorities could be improved. In RSA-911 analyses, there were significant differences by race/ethnicity in both acceptance rates and competitive employment. Whites were significantly more likely than other races/ethnicities to be accepted to receive services and also to be closed with competitive employment. Specifically, Whites were competitively employed at a rate of nearly double the rate for African Americans (51.2% and 25.9%, respectively). Competitive employment rates were also lower for Hispanics (33.3%) and for American Indians (10%). The majority (57.9%) of staff respondents indicated that services to consumers with diverse racial or ethnic backgrounds was a critical (31.6%) or moderate (26.3%) need for improvement.

Across multiple data sources, there were indications that improvement of services to non-English speaking individuals is needed. Those of Hispanic origin were under-represented in percentages who received services by NCBVI compared to the percentages of their population in the state. Key informants and staff respondents indicated that there are various barriers associated with serving non-English speaking consumers. These issues included cultural barriers, language or communication issues, and outreach concerns. Improving the availability of materials for non-English speaking consumers was indicated as either a critical or moderate need by 73.7% of staff respondents. Staff and key informants suggested that the use of local translators can create a perceived threat to confidentiality among non-English speaking consumers, especially in small communities. One recommendation provided was to contract with non-local translators by phone when possible. Another respondent suggested that specific steps need to be taken beyond what is outlined in the Minority Outreach Plan. Suggested actions to potentially improve services include making all materials and outreach brochures available in Spanish and reaching out to communities to learn about cultural issues that may discourage individuals from contacting the Commission.

Employment-related assistance

Employment-related assistance was another area of need identified by several data sources. This was one of the most common rehabilitation needs identified by key informants, for all people who are blind or visually impaired and for those with the most significant disabilities. Consumers indicated a remaining need, after receipt of services, for many employment-related services. The services included assistance with finding a job (39.3% reported still needing help in this area), finding job leads or contacting employers (38.5%), assistance working with employer to provide accommodations (34.8%), filling out a job application (33.3%), exploring career options (26.7%), support from counselor to raise career expectations (24%), improving interview skills (21.4%), and guidance in developing a resume (11.8%). More than one quarter of the consumer respondents (28.2%) indicated that they did not achieve their employment goal. However, it is relevant to note that when reporting on barriers experienced to employment, the top five barriers identified are not things that can be directly influenced by the agency.

Several items on the staff survey addressed employment-related services. The two items that were identified as having the greatest needs were Improving placement services by developing and strengthening relationships with employers and community organizations and improving services that enable consumers to learn more about career options (both identified by 84.2% of

staff as a moderate or critical need). Also considered a moderate or critical need by most staff were improving job placement services to help clients find or maintain employment (78.9%) and improving training for consumers on job seeking skills (68.4%). Some suggestions related to improving services in these areas were: doing more on-the-job training, use of professionals to help with career exploration, use of career assessments, providing more opportunities for bringing employers and job-ready consumers together, all staff being involved in networking with employers, and having one staff person in each district specialize in placement activities.

Assistive technology

Training in assistive technology, including computer assistive technology, was the highest area of need reported by consumers in their survey. After completing their rehabilitation programs, a number of consumers reported a remaining need for training in this area. Of the people who reported that they initially needed the service, 20.8% (n=11) for assistive technology and 14.8% (n=8) for computer assistive technology reported still needing the service after completion of their programs. Four of the seven consumers who indicated a remaining need after services (to the open-ended question) indicated a need in this area. In addition, 33.3% of employers who completed the survey indicated that providing assistance with assistive technology would help them in hiring or retaining people who are blind or visually impaired, and two key informants identified assistive technology as an important rehabilitation need.

Most staff also considered items associated with improving assistive technology to be important needs. Improving the assistive technology training to consumers was rated the second highest in terms of critical need (36.8% of staff rated as critical and 42.1% rated it as a moderate need). A large majority of staff (84.2%) also believed that offering more in-service training for staff who provide assistive technology to consumers and providing more assistive technology support to employers were moderate or critical needs. Staff provided several suggestions for improving services related to assistive technology. Several recommended additional, ongoing training in use of assistive technology for all staff (not just the tech staff). Two suggested group training classes for consumers. One suggested that better teamwork was needed between VR/OC counselors and technology staff.

Partnering with other organizations

Across multiple data sources, many respondents suggested that several needs could be addressed by partnering with other agencies and organizations. According to respondents, collaboration with resources external to NCBVI has the potential to address several issues, particularly those related to expertise and funding constraints. Staff members and key informants suggested partnering with other agencies, consumer groups, and experts to improve service to those with multiple disabilities by providing staff training, learning from successful organizations, and sharing costs and caseloads. Specifically, some individuals suggested partnering with experts in mental health, memory loss, and brain injury associations.

Respondents suggested that partnering with organizations would also improve services to other special populations such as the older blind, transition age youth, non-English speaking consumers, and those living in rural areas. For example, key informants suggested that NCBVI

could better serve older blind consumers, by reaching out to senior centers, community centers, the Department of Aging, and state independent living centers. Respondents also suggested that partnerships should be established with schools and educators beginning as early as pre-school, with direct communication with TVIs, which would develop better relationships to later serve transition-age youth.

In addition to these partnerships, some respondents noted the benefits of strengthening partnerships with community organizations, non-employment related agencies (such as housing, transportation, and Medicaid), advocacy groups, the Nebraska Partner Council, and low vision clinics. Most respondents suggested that partnering with other organizations is a viable way to better serve hard to reach consumers and to improve services with limited funding. Some respondents suggested that partnering with agencies in rural areas, or hiring paraprofessionals, would improve outreach and services to those living in those communities. Collaboration with other agencies was also suggested as one way to improve services to non-English speaking consumers by learning how cultural and language barriers are being addressed by other community agencies. While most respondents were in favor of improving and developing partnerships, one individual cautioned that "sometimes too many agencies working together can create delays and miscommunication."

Services for consumers in rural areas

A large majority of staff indicated that enhancing services in rural areas was either a moderate (47.4%) or critical (42.1%) need, making it the most critical area for improvement of all items on the staff survey. In addition, one key informant stated that reaching consumers in rural areas is a problem. However, analyses with RSA-911 data did not indicate a significant difference in acceptance rates or competitive employment rates based on rurality. Though not significantly different, highest acceptance and competitive employment rates were among those living in rural areas (86.8% and 50% respectively), while those living in urban areas had the lowest acceptance and competitive employment rates (75.2% and 45.3% respectively). To evaluate whether people living in rural areas might be underserved (under-represented), percentages of consumers served in rural, urban, and metro areas were compared to percentages for the entire population of the state, and no differences were found.

Despite lack of evidence from secondary data sources (RSA-911 and state population data), staff and one key informant perceived services to consumers in rural areas to be an important area needing improvement. A variety of suggestions for improving services to consumers in rural areas included increasing outreach efforts in these areas, increasing presence by providing more counselors and visits to clients in those areas, promoting self-employment, and partnering with other agencies or contracting with professionals within rural communities.

NCBVI has studied and assessed these research findings in conjunction with other methods for gathering data in the establishment of priorities for improving VR services to blind and visually impaired individuals and in the consideration of future practice and policy.

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As noted above, NCBVI will be switching to a new, more comprehensive client data management system. This will enable us to achieve our goal to improved quality assurance with a systematic assessment of progress of all aspects of service delivery. The system will be customized to our environment and fine-tuned to provide the data-analysis components which we will find most useful in the future.

Work to implement a new database management system will address all four goals and enable NCBVI to analyze the effectiveness of all parts of the client services system. We can then use the data based results to add value to our overall efforts, achieve established goals, and to identify future needs and challenges.

(q) Quality, Scope, and Extent of Supported Employment Services

Supported Employment (SE) is an employment option available to individuals with the most significant disabilities receiving services from NCBVI. An individual with the most significant disability is defined in rule (Title 192 Nebraska Administrative Code, Chapter 1) as an individual with a severe visual impairment or combination of visual, physical, or mental impairments which profoundly limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and an individual whose vocational rehabilitation can be expected to require extensive or intensive SE services for at least twelve months.

SE requires the provision of a job coach for the initial, intensive training; and requires long-term, intermittent support to insure the individual is successful on the job. This long term support is provided for as long as the person has the job.

NCBVI provides financial support of SE services using Title IV Subtitle G funds only if the placement is expected to meet the following conditions:

1. The placement is community-based.
2. The consumer is integrated into the workforce with other non-disabled individuals.
3. The consumer earns minimum wage or better.
4. The need for ongoing support is expected to continue indefinitely.

NCBVI works in partnership with the Department of Health and Human Services-Division of Developmental Disabilities (NDHHS-DDD) in the provision of SE services to blind and visually impaired individuals with developmental disabilities. Each individual with a developmental disability has a case service coordinator, employed by NDHHS-DDD. The case service coordinator is responsible for developing an Individual Program Plan for each client. The Plan includes provision for the ongoing financial support of SE services provided by NDHHS-DDD after NCBVI support is discontinued. Over the past few years, NCBVI has been using a milestones system for financial support of SE services provided by private vendors. The milestone approach mirrors the model used by the general agency (Nebraska VR Services). Using this model, the client will remain

in an active status for about a year after the start of employment. The arrangements are made on a case-by-case basis.

NCBVI collaborated with the Department of Education, Special Education and Vocational Rehabilitation in the development of policies and procedures more clearly delineating the responsibilities of the different agencies and institutions involved and the scope and nature of services available to younger persons with disabilities in transition from school. The Collaborative Agreement between NCBVI, Department of Education/Special Populations, and the Nebraska Center for the Education of Children who are Blind or Visually Impaired, applies to persons who are likely to require supported employment in the future, as well as those students without this need. Particular emphasis is placed on the provision of pre-vocational transition services for blind and visually impaired students in need of SE services between the ages of 14 and up to but not including the age of 22.

Financial support by NCBVI for supported employment services is limited to 24 months unless there are compelling reasons to believe that extending NCBVI support will result in a more successful placement. For example, supported employment services may be provided by NCBVI for longer than 24 months in those cases involving consumers between the ages of 18 and 22. Developmental Disabilities (DDD) does not pick up the cost of supported employment services until individuals have reached the age of 22. In such cases, NCBVI will extend services for longer than 18 months until the age of 22 is reached. In those cases in which the consumer has a developmental disability, long-term financial support after NCBVI's support is discontinued is typically provided by NDHHS-DDD.

Efforts are currently underway to establish a partnership with the Nebraska Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) similar to the one between NCBVI and NDHHS-DDD using the milestone approach for providing SE services. The partnership with NDHHS-DBH is expected to expand SE service opportunities to blind and visually consumers with behavioral health issues.

A small number of blind and visually impaired consumers with significant, non-developmental secondary disabilities occurring after age 21 might benefit from SE services. Generally, however, funding for services extending beyond eighteen (24) months to such persons is not available in Nebraska. In such cases, the Deputy Director of Client Services and the immediate supervisor of field services works with the NCBVI Counselor involved to identify possible resources for the ongoing support, such as developing a PASS (Plan to Achieve Self Sufficiency) or personal resources. The Deputy Director also provides statewide training and information to NCBVI personnel regarding the SE program.

NCBVI has service contracts with a number of providers in the Nebraska Developmental Disabilities system and with private providers of job coaching and related services. Contracts are developed on behalf of individuals with the most significant disabilities with both private and public providers who are actively seeking suitable work placements for them in integrated

settings. The total amount of Title IV Subtitle G funds that we project to expend in FY 2016 is $30,000. We expect to provide SE services to approximately 30 clients in FY 2016.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

Jobs for Veterans State Grant

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

DVOPs and LVERs have formed strong partnerships with other AJC programs to integrate veteran services and to promote employment, training, and placement opportunities for veterans throughout the areas of the state. This includes integration with other state and federal agencies. This integration ensures that qualified veterans can be simultaneously enrolled with other partner programs such as Wagner-Peyser, Trade Adjustment Assistance (TAA), Workforce Innovation and Opportunities Act (WIOA), and Vocational and Rehabilitation Employment Program (VR&E).

Lincoln and Omaha DVOP staff currently attend U.S. Department of Veterans Affairs Chapter 31 VR&E orientation sessions hosted in these metro VA offices. Omaha staff partners with Offutt Airman & Family Readiness staff with two significant veteran focused job fairs each year hosted in the spring and fall.

In collaboration with the Nebraska National Guard (NENG), Wagner-Peyser staff routinely attend unit demobilization and reintegration trainings to assist eligible veterans with employment and training services. These events, known as "Yellow Ribbon Events" provide staff an opportunity to promote veteran services to newly separated veterans. DVOPs work with Wagner-Peyser staff to inform and education them on relevant information to promote and share. NDOL conducts training sessions to present job search, resume, and interviewing skills workshops to NENG members during weekend unit trainings and other appropriate occasions. NDOL will develop, implement, and offer new and updated informational sessions during NENG weekend training sessions as needed.

State VR has developed a Traumatic Brain Injury (TBI) Task Force and facilitates education and trainings for those providing services to this unique population. NDOL is working to ensure that all DVOP and LVER staff has the opportunity to attend these informational sessions. Traumatic Brain Injury Task Force awareness and resource emails are distributed to DVOP and LVER staff to allow them to get a better understanding of the program and its resources. This allows the DVOP and LVER staff to address the employment barriers created by TBIs.

NDOL continues to develop and refine the relationship with the Veterans Association (VA) Regional Office with regard to assisting and monitoring Chapter 31 Veterans. In Nebraska, the state JVSG Program Coordinator, assigned to the Nebraska Department of Labor Office of Employment and Training, coordinates Chapter 31 referrals from VR&E Counselors to DVOP staff across the state. Upon receipt of the referral, DVOP staff members commence communication with the referring VR&E counselor and the veteran to verify needed services and/or employment plans as appropriate. Nebraska intends to expand its partnership with VR&E over the next year to establish an outstation agreement that is mutually beneficial to both agencies. This may

include placing DVOP staff on a part-time basis at VA offices or placing VA Counselors on a part-time basis at NDOL locations.

The JVSG Program Coordinator also supports the Hiring our Heroes (HOH) job fairs conducted by the U.S. Chamber of Commerce in order to help veterans, transitioning service members, and military spouses find meaningful employment opportunities. Nebraska typically hosts three HOH job fairs each year and plans to continue this for years to come. The location for these events changes with each job fair to provide services to veterans statewide.

The majority of state and county correctional facilities are located in or near the Lincoln and Omaha AJCs and NDOL office locations. Local DVOPs provide outreach, employment, and training information to incarcerated veterans at several correctional facilities located in these areas. DVOP outreach at these facilities is scheduled as needed when veterans are identified within the incarcerated population. Eligible incarcerated veterans, who are approved for work release, are referred to DVOPs for job development and other placement activities to provide optimal support as the incarcerated veteran transitions to life outside the correctional institution.

The preponderance of homeless veterans are located in the two metropolitan service delivery areas of Omaha and Lincoln, which also have the greatest number of support agencies available to provide assistance. However, regardless of location, when a homeless veteran is identified, the DVOP will commence and coordinate support activities with local shelters and health organizations to provide for basic subsistence needs and referral to job training activities or agencies. If job ready, DVOPs provide job placement/referral activities and initiate contact with public housing and social service agencies to provide often needed support services when transitioning to employment.

All DVOP and LVER staff members have the responsibility to expand partnerships and coordination with other resource and community agencies in their locations in order to locate and assist the various veteran groups and provide additional services. LVER staff will work with industry employers and employer associations to identify the skills needed for in-demand careers. If applicable, LVERs will provide information on military skill identifiers and military occupational specialties that possess similar skills and experiences, but may be unknown to employers due to differences in military/civilian terminologies. LVER staff will work with additional agencies including Nebraska State Vocational Rehabilitation, local County Veteran Service Offices, Vet Centers, satellite VA clinics, homeless shelters, and NENG units, etc., to develop the in-demand skills that have been identified. LVERs will keep DVOPs well informed of the in-demand jobs and related job training opportunities. DVOPs will present information on services and opportunities in high-demand, high-skill, and high-wage (H3) occupations while conducting career counseling. DVOPs will assist veterans and eligible spouses in making decisions based on individual needs in conjunction with the projected labor market information.

NDOL has partnered with the state Apprenticeship program to assist with the screening and assessment for the local electrical workers and steamfitters unions. Additionally, NDOL has developed a dedicated veteran's services web page outlining available resources. Through this

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web page, veterans and military personnel can access a current NDOL office directory with all appropriate location and contact information. The web page includes information regarding priority of service, job search services and location sites, job fair information, and links to other veteran service organizations, federal employment information, and state and federal benefit information.

Due to the isolated nature of the Native American communities living on tribal lands in largely unpopulated rural areas of Nebraska, specific outreach plans for Native American Veterans have not been developed.

Success regarding services to veterans will be monitored and assessed through existing report mechanisms. This includes quarterly reports and reports located within NEworks. These reports currently provide information on employment and training activities on veterans with SBE's and the targeted population at a state, regional or local perspective.

(b) The duties assigned of DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

DVOP Staff: Nebraska's current staffing model is predominantly a DVOP model. All DVOPs are state merit staff and assigned to a Nebraska Department of Labor location or American Job Center. DVOPs are integrated into the one-stop delivery system and are well versed in the process of developing and maintaining strong relationships with other service providers and plan partners to promote employment, training, and placement services for veterans. NDOL conducts numerous public relations activities to ensure the general public is aware of the services available to veterans. This includes the use of informational pamphlets, webpages, and social media posts containing information about the employment services offered by DVOPs and LVERs.

DVOPs will provide or coordinate the full range of employment and training services to eligible veterans in accordance with the VPL 03-14 & VPL 04-14. The intent is to serve veterans with the following Significant Barriers to Employment (SBE) or within the following target population(s):

- A special disabled or disabled veteran
- Homeless
- A recently-separated service member, who at any point in the previous 12 months has been unemployed for 27 or more weeks
- An offender who is currently incarcerated or released from incarceration
- Lacks a high school diploma or equivalent certificate
- Low-income
- Veterans or Transitioning Service Members between the ages of 18-24
- TSMs identified as in need of intensive services
- Members of the armed forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility (MTF) or Warrior Transition Unit (WTU)
- The spouse or other family caregivers of such wounded, ill, or injured members

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These veterans may be identified and referred through other partner or program staff such as WIOA, Trade Adjustment Assistance (TAA), Unemployment Insurance, Department of Health and Human Services, Vocational Rehabilitation, Veteran County Service officers, among others. Regardless of the referral source, the provision of direct services provided by DVOP staff to veterans with a SBE may include, but are not limited to:

- Initial and/or in-depth assessment
- Intensive services as defined in VPL 07-10
- Case management activities and established case files
- Individual Employment Plans (IEP)
- Provision of Labor Market Information
- Referral to supportive service programs and resources
- Co-enrollment (shared case management responsibility) with other agency, state or partner staff
- Job search assistance
- Job developments
- Individual or group career counseling

DVOP staff will also place emphasis on outreach activities and partnerships with other NDOL partners and programs within their local communities to locate those veterans who may benefit from more intensive services. The DVOPs will provide technical assistance or guidance as needed to community-based organizations and assist other NDOL staff in carrying out their responsibilities to serve veterans.

All VR&E referrals/Chapter 31 veterans will be disseminated to DVOP staff. The referral process will be coordinated through the State JVSG Program Coordinator. VR&E counselors will outline needed services for the veteran that may include the need for labor market information, assessments, and job placement services. DVOP staff will case manage and track those veterans deemed "job ready" or who are within 90 days of completing their Individual Written Rehabilitation Plan (IWRP). DVOP staff will be required to maintain regular communication (monthly or on a more frequent basis) with the veteran and provide monthly updates to the VR&E counselors regarding the veteran's progress. VR&E activities and Chapter 31 veteran updates will also be included in monthly and quarterly reports disseminated to Nebraska's DVET.

DVOP Responsibilities and Job Functions include, but are not limited to:

1. Outreach
    a. Provide outreach services to the entire service area; including surrounding towns outside of the NDOL Location
    b. Actively recruit eligible veterans and spouses through consistent and on-going efforts. These efforts include:
        - Partnering with Wagner-Peyser to data mine in NEworks to make referrals to DVOPs
        - Developing and expanding partnerships with agencies that serve veterans

        - Communicating with veteran service staff from other veteran programs (Nebraska Veteran Affairs, County Veteran Service Officer (VSO), etc.)
        - Partnering with community colleges, state colleges, universities and other educational institutions to obtain veteran referrals
    c. Review newly registered reports in NEworks and partner Wagner-Peyser to receive veteran referrals
    d. Maintain beneficial relationships with area VSOs, VFWs, American Legions, Local Armory, Salvation Army, Rescue Mission; Goodwill; National Guard and Reserve; Community foundations; Chamber of Commerce's and such within the communities.
2. Service Delivery
    a. Recruit, enroll and maintain an active caseload that corresponds to the staffing matrix:
        - 1.0 FTE = minimum of 40 qualifying/eligible veterans.
    b. Provide all veterans on the caseload with intensive services at least once every 30 days.
    c. Provide case management and intensive services for no more than 6 months per veteran.
    d. Maintain an active caseload that accurately reflects the veterans being provided intensive services.
    e. Remove veterans from case management at the conclusion of intensive services.
    f. Request an extension to provide intensive services beyond 6 months.
    g. Continuously evaluate the intensive services provided to veterans to determine if sufficient progress is being made and how the veteran is benefitting from the intensive services provided.
3. Priority of Service
    a. Inform and educate NDOL staff and partner programs of Priority of Service and changes in policy.
4. Program Knowledge
    a. Be informed of changes in veteran related policies and programs, and share relevant information with staff and management.
    b. Attend National Veterans Training Institute (NVTI) training.
    c. Participate in Vets Technical Assistance activities, webinars and trainings.
5. Reports
    a. Provide input and information to the Manager for the quarterly Veteran reports for the local office. Completion and submission of this report is the manager's responsibility, but it is completed with input from the DVOP.

MANAGEMENT Responsibilities to support DVOPs include, but are not limited to:
The Manager is responsible for the workload and production level of the DVOP. To ensure that that the DVOP is working productively and meeting the goals of the VETS program, the Manager will:

1. Meet on a regular basis with the DVOP to discuss the following:
    a. Outreach and enrollment efforts.

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   b. Any obstacles that are preventing the DVOP from meeting expectations.
   c. Enrollments and services provided since the previous meeting will be reviewed.
   d. The Manager will identify DVOP strengths shown and opportunities for improvement.
   e. Issues, questions and concerns will be discussed.
2. Follow-up with the DVOP to ensure veterans are receiving Priority of Service for eligibility programs.
3. Review all new enrollments to ensure data integrity and program eligibility are met.
4. Determine the need for and request technical assistance from the Veteran Program Coordinator.
5. Assist in coordinating necessary NEworks Training and Technical Assistance to be provided via the Manager, NDOL Administration, and/or the Veterans Program Coordinator.
6. Assist in coordinating National Veterans Training Institute (NVTI) training.
7. Monitor DVOP progress using NEworks reports.
8. Run and share appropriate NEworks reports, including Enrolled Individual reports and Services Provided Individual reports, to inform the DVOP of progress and identify areas of concern.
9. Conduct Quality Control (i.e. monitoring, data integrity, oversight, etc.) to ensure that program guidelines, rules and expectations are followed.

LVER Staff: Nebraska will support three LVER positions in this next fiscal year; each with specific duties and responsibilities.

JVSG Program Coordinator

One LVER will be assigned to the State Administrative office and will serve as the state JVSG Program Coordinator. Primary duties for the JVSG Program Coordinator will be to provide technical assistance to DVOPs and LVERs regarding NDOL and USDOL guidance, policies, and mandates on services to veterans. This position will also be responsible for all quarterly and annual reporting requirements as defined in the JVSG grant. This LVER will also assist in coordinating staff attendance at veteran-focused job fairs, Nebraska National Guard demobilization activities in their assigned areas, and compile the Quarterly Managers Report on Services to Veterans, VR&E Quarterly Report, and JVSG Quarterly Report.

Omaha Supervisor LVER

The second LVER position serves in a lead capacity for DVOP staff assigned to the Omaha AJC and NDOL Omaha location. As the Omaha metro area serves up to 60% of Nebraska's employment and training customers and the majority of the state's job seeking veteran population, Omaha is the only locale with a defined Veterans unit consisting of three DVOP and one LVER staff. This unit receives and serves the majority of Chapter 31 referrals in Nebraska.

Virtual Services Unit (VSU) LVER

The third LVER position will function within the Virtual Service Unit. The LVER functioning in this position will primarily provide virtual support to employers utilizing the NEworks system. This

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role will provide statewide LVER functions while working with both DVOPs and employers throughout Nebraska to assist in placing veterans in quality employment and filling employer's needs.
The VSU LVER will serve as the veterans' services liaison on a statewide basis to promote job and training opportunities on behalf of veterans within the workforce system. The LVER will also establish and maintain regular employer contacts to develop educational, promotional and employment opportunities for veterans.

The outlined duties do not preclude the overarching LVER responsibility to ensure that veterans are provided the full range of labor exchange services to meet their employment and training needs. The LVER shall be available to provide guidance and/or technical assistance to NDOL staff regarding the identification and referral of those veterans who may benefit from more intensive services provided either by DVOP staff or other partner resources.

LVER staff will also conduct employer outreach either independently or through the coordinated efforts of the AJCs and NDOL locations. Through contacts within the employer community, LVER staff work to develop employment and job training opportunities, apprenticeship, and other on-the-job (OJT) training positions to benefit the veteran community.

VSU LVER Responsibilities and Job Functions include, but are not limited to:
LVER staff promote available resources, programs, and work to develop or expand the network of community and employer groups for the purpose of opening all avenues of assistance and job opportunities to these veterans.

1. On a weekly basis, team members will:
    a. Conduct Employer Outreach
        - Contact employers for job postings. Explain the benefits of posting on NEworks;
        - Provide information on self-service job postings;
        - Explain to the benefits of job development and hiring veterans. Federal contractors will be informed of their responsibility to recruit and retain qualified Veterans;
        - Promotional calls will include calls placed to unions, apprenticeship programs, and business organizations to promote the benefits of hiring veterans.
    b. Provide Job Order Assistance/Follow-Up
        - Job Order Assistance will take place during "Promotional" and "Follow-Up" calls with employers;
        - Staff will promote self-service job posting for employers.
    c. Perform Customized Recruiting
    d. Contact DVOP and Wagner-Peyser staff throughout the state to find Veterans who are job ready and qualified for available positions.

2. On a monthly basis, the LVER will:

a. Conduct speaking engagement(s) to a community business organization or union on the benefits of hiring qualified veterans
   - Speaking engagements will be to groups where five or more employers are expected to be present;
   - Speaking engagement will focus on the benefits of hiring veterans
   - Employers attending the speaking engagements will be followed up within two business days
b. Plan and/or participate in career fairs/hiring events within a 90-mile radius of Lincoln
   - Coordination between the LVER and the partner programs will take place to coordinate each staffs' roles in the event
   - LVER will engage employers in conversation about the benefits of hiring veterans.
   - LVER will partner with Wagner-Peyser to promote services offered to job seekers
   - Interested job seekers will be followed up within 2 business days of the event to review the veteran's job skills, abilities, goals, and any limitations
   - Labor market information and vocational guidance will be reviewed with the job seeker

(b) The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or one-stop delivery system partner network;

The Nebraska Department of Labor currently hosts 1 American Job Center (AJC) and 14 NDOL locations across the state. NDOL will locate 9.5 grant funded DVOPs and 3 LVERs at the locations identified in the map below.

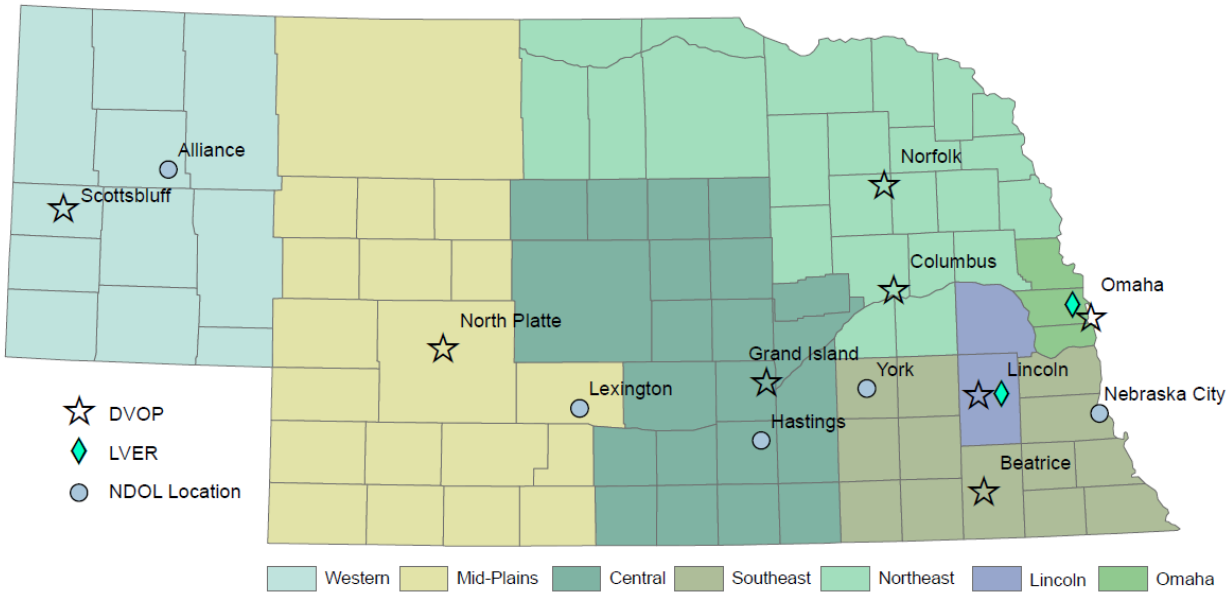

Figure 3 – Deployment of JVSG Staff within Nebraska Department of Labor

Region	Program	Number of Staff	Number of Counties
Western	DVOP	1.0	11
Mid-Plains	DVOP	1.0	19
Central	DVOP	1.0	22
Southeast	DVOP	1.0	13
Northeast	DVOP	1.5	23
Lincoln	DVOP	1.0	2
Omaha	DVOP	3.0	3
Omaha	LVER	1.0	3 (same as DVOP)
VSU	LVER	1.0	Statewide
Administration	LVER	1.0	Program Support

In the Omaha area, two DVOPs provide services from the "F" Street NDOL location with an additional DVOP providing service at the Omaha American Job Center (operated by Heartland Workforce Solutions, serving the same three counties). One LVER staff will operate from the Virtual Service Unit and a LVER Supervisor will be located at the Omaha "F" street NDOL location. The JVSG Program Coordinator will operate as a LVER from the NDOL administrative location in Lincoln.

NDOL will work to fill any DVOP or LVER vacancies as expeditiously as possible. When notified of a potential opening or staff intent to vacate a position, managers will seek approval or authorization from senior management to hire as soon as possible. This may include filling vacant positions with temporary or interim positions. Additionally, NDOL makes every attempt to satisfy the requirement in 38 U.S.C. 4102A(c)(8), stating that all newly assigned DVOP and LVER staff will receive training from the National Veterans' Training Institute within 18 months of assignment. Nebraska will do this by scheduling mandated courses at the time the DVOP/LVER has successfully completed their initial six-month probationary period upon hire.

(c) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

NDOL uses monetary incentive awards program to recognize employees that provide exceptional service to veterans. The NDOL will use 1% of the JVSG funding for Veterans Performance Incentive Awards.

The main objective of the program is to encourage our employees to be more attuned to the needs of our veterans and to motivate them to provide each veteran with outstanding service. A second and equally important goal is to ensure there is improvement to the overall system of providing services to veterans.

Exceptional Customer Service

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- Success stories – The monthly success stories submitted over the course of the previous year will be reviewed and the best story selected. The DVOP that provided the best success story will be awarded $4,500 for use at his/her NDOL location.

Operational Excellence

- This award will be presented to the office that has successfully case managed the highest average number of veterans into employment in the previous 12 months as measured by NEworks (calculated by the number of successful employment placements of an office divided by the number of DVOPs). Measured from July 1 to June 30. The office or region that has successfully transitioned the greatest number of veterans into employment will be awarded $4,500.

Awards will occur annually on the following timeline: Application deadline: July 14. Announcement of winning NDOL location by July 21. All allocated funds must be obligated by September 30. The JVSG Program Coordinator, the Employment & Training Administrator, and the Director of the Office of Employment & Training will function as the selection committee for these awards.

The funds awarded will be used to support the JVSG activities at the NDOL location where recipients are assigned. These funds can be used for activities that support the goals of the JVSG to include expenditures on advertisement, training, and improved equipment and technology.

(d) The population of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g. Native American veterans; veterans in remote rural counties or parishes;

In accordance with Veteran Program Letter (VPL) 03-14, VPL 04-14, and VPL 08-14 Nebraska is placing emphasis on service to veterans in need of intensive services. In order to easily identify veterans most in need, all American Job Centers (AJCs) & NDOL offices will conduct "first point of contact" initial assessments. Veterans are afforded the opportunity to voluntarily disclose information that allows AJC & NDOL staff to determine if there is a need for intensive services. If there is a need, the veteran is referred to a DVOP to deliver intensive services per the guidelines established in Veterans Program Letter (VPL) 07-10, VPL 03-14, VPL 04-14, VPL 08-14, and VPL 03-14 change 1. DVOP staff will serve those with Significant Barriers to Employment (SBE) as defined by VPL 03-13 and target populations as defined by VPL 04-14 and VPL 08-14 listed below:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); Special disabled and disabled veterans are those:
    - who are entitled to compensation (or 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;
- Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));

- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who at any point in the previous 12 months has been unemployed for 27 or more weeks;
- An offender, as defined by WIOA Section 3 (38)1, who is currently incarcerated or who has been released from incarceration;
- Lacking a high school diploma or equivalent certificate; or
- Low-income (as defined by WIOA at Sec. 3(36))2.
- Veterans and Transitioning Service Members between the ages of 18-24;
- Members of the armed forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility (MTF) or Warrior Transition Unit (WTU); or,
- The spouse or other family caregivers of such wounded, ill, or injured members

In addition to veterans assessed at "first point of contact," DVOPs routinely receive referrals from other agencies working with veterans with disabilities such as State Vocational Rehabilitation (VR), VA Vocational Rehabilitation (VR&E), and Nebraska's Vets Centers. For veterans not identified at "first point of contact," Wagner-Peyser staff will search NEworks, Nebraska's management information system, for new veteran registrations and refer veterans to the DVOPs as appropriate. Figure 1 illustrates the referral process, of veterans entering the physical location and veterans being data mined out of NEworks, from Wagner-Peyser staff to DVOP staff at NDOL locations.

Nebraska hosts three AJCs. These are located in Grand Island, Lincoln, and Omaha. The NDOL operates the AJC in Grand Island, but does not operate the AJCs in Omaha and Lincoln; instead NDOL acts as a partner to offer DVOP services. Figure 2 represents the encouraged referral process between partner AJCs and DVOP staff.

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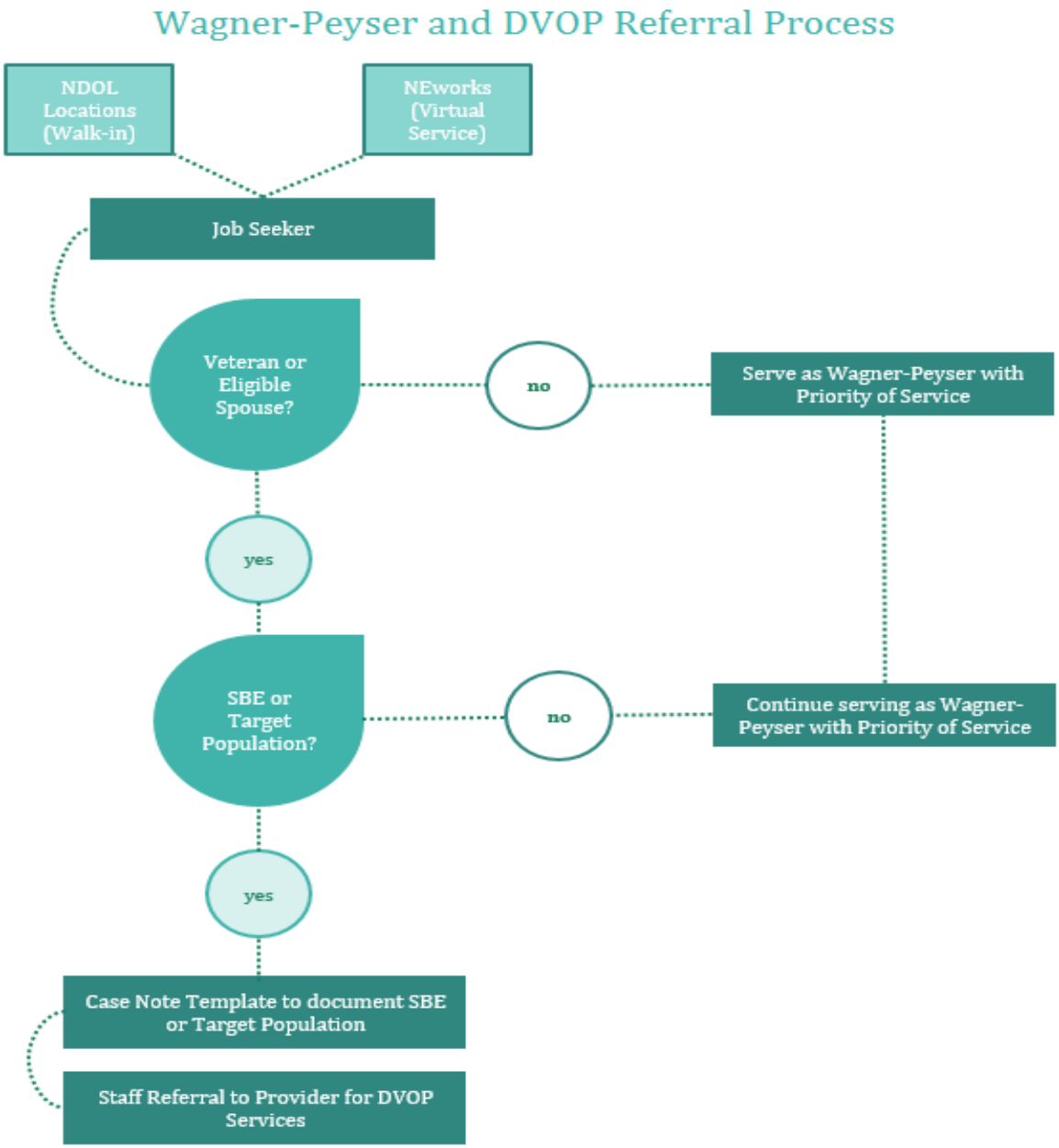

Figure 1 - Wagner-Peyser and DVOP Referral Process

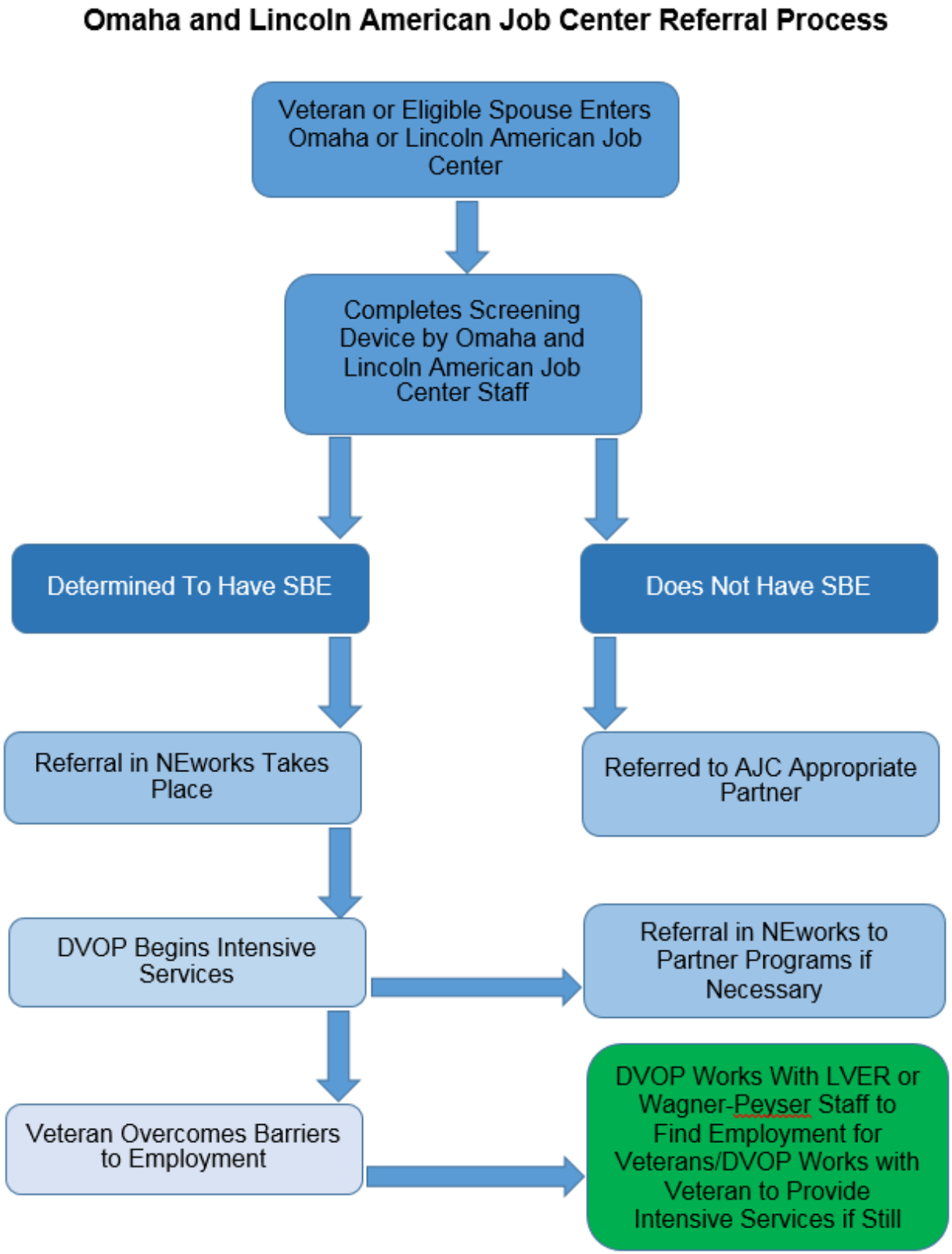

Figure 2 - Omaha and Lincoln AJC to DVOP Referral Services

DVOPs in Nebraska offer several core and intensive services to veterans with Significant Barriers to Employment (SBE) and qualified spouses. These services include but are not limited to: resume preparation, education on proper work/interview attire, education on interviewing skills, job search assistance, job coaching, assistance finding housing, and referrals to supportive services offered by other Federal, State, and non-profit organizations.

NEworks provides self-service options to resources and website links that veterans and eligible spouses can access from their residence or any accessible public computer. NEworks provides veterans access to a vast range of job opportunities from corporate job posting boards and external job search engine websites that are imported into NEworks on a daily basis.

As prescribed by the VR&E counselor, Chapter 31 veterans may receive a wide range of services to include: labor market information, assessment, career guidance, and counseling. DVOPs provide case management services as needed, especially for those in need of placement services or other services to become "job ready". Case management services include the development of an Individual Employment Plan (IEP), in-depth assessments, and regularly scheduled communication or follow-up until the veteran no longer requires DVOP services or the VR&E counselor closes the veteran's file.

(a) How the State implements and monitors the administration of priority of service to covered persons;

Priority of Service (POS) to veterans has been incorporated into all local WIOA plans and a specific Veterans Priority Provisions policy has been developed for all AJCs and NDOL locations.

When accessing a NDOL location, Veterans and eligible spouses are made aware of their right to priority of service through signage. These individuals will receive "first access" to all employment and training services for which they may qualify. Identification of such veterans or covered persons will be made by "first point of contact" initial assessment as well as referrals from other partner or program staff.

NDOL will maintain POS signage promoting priority of service in all NDOL locations. NDOL will also maintain updated veteran focused brochures or pamphlets outlining POS and other employment and training services available for veterans through the NDOL locations.

Priority of service is further supported through the state labor exchange system, NEworks, which automatically matches qualified applicants to available jobs. When a job search is run against any job opening, a list of qualified job seekers is created. All eligible veterans are placed at the top of the list and will be notified of job openings before non-veterans. NDOL staff are responsible for reviewing job orders for qualified eligible veterans and making referrals.

Veterans and eligible spouses referred to other DOL programs will receive priority over non-veterans in terms of eligibility determination and enrollment. Veteran populations targeted for

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special consideration in accordance with VPL 03-14 as well as Chapter 31 veterans will receive priority for DVOP case management services.

Priority of Service will be monitored through existing report mechanisms such as quarterly and federal reporting and NEworks reports. These reports provide information at a state, regional, or local perspective through which the percentage or ratio of service delivery of veterans to non-veterans may be compared.

(c) How the state provides or intends to provide and measure, through both the DVOP and one-stop delivery system partner staff: (1) job and job training individualized career services, (2) employment placement services, and (3) job-driven training and subsequent placement service programs for eligible veterans and eligible persons;

1) The State will provide Job and Job Training individualized career services by providing 1-on-1 services to veterans with SBEs and other eligible persons. These 1-on-1 services will center around formal and informal assessments to determine the skills, strengths and barriers faced by the participant.

   An Individual Employment Plan (IEP) will outline the identified barriers and plan to overcome these barriers to gain sustainable employment. The IEP will be developed in coordination with the participant to ensure greater success through their agreement and "buy-in" of the plan. Additional services will be provided based on the needs of the individual. Referrals to service provider is a key aspect of ensuring a participant receives individualized services. Program staff will follow up with service provider referrals to determine the success and benefit to the customer of such referrals.

   Coordination with partner programs that have Job Training funds is key to the successful upskilling of veterans. Co-enrollment and leveraging of resources will allow veterans to receive the greatest amount of services. Communication between partners will occur on a formal and informal basis to allow continual support of veterans through job training programs. Release of Information documentation will be collected when necessary, in order to allow this communication to occur between the programs and not require the veteran to repeatedly provide the same information multiple times to partnering programs.

2) Employment placement services will be leveraged through the Wagner-Peyser program, including the NEworks website and Employment Service staff. Veterans will be shown the benefits of job search, posting a resume, setting up a Virtual Recruiter, and other self-service options with in NEworks to maximize the opportunities for employment.

   In addition to self-service options, participants will receive the benefits of Employment Service staff. Employment Service staff will provide veterans with priority of service when they make job referrals for job postings within NEworks.

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LVER and DVOP staff will coordinate with Employment Services (business services and job seeker services) staff promote qualified veterans as part of the hiring pool in Nebraska. New served veterans will have the opportunity to leverage their recently obtained employment skills to work for employers in their community.
NDOL staff also conduct outreach to Federal Contractors to offer assistance with meeting the requirements of Office of Federal Contract Compliance Programs (OFCCP). This assistance includes recruitment and referral of qualified veterans for their job openings, as well as promoting job development opportunities with employers.

3) Job-driven training and placement services are coordinated with job training providers and other service and training providers in each region. Veterans are provided Labor Market Information (LMI) from a variety of sources, in including: the NEworks website; Career One-Stop resource; H3 website (h3.ne.gov) which provides information on High Wage, High Skill, High Demand jobs at a local, regional and statewide level in Nebraska. This LMI provides insight on the current and growing opportunities available to veterans and other job seekers. Veterans are counseled with this information to determine in-demand opportunities and job-driven trainings that may assist them in achieving these employment goals.

   Veterans are referred to one-stop partners with job training funds to assist the veterans in receiving the job-driven training. Veterans are also referred to other financial assistance providers, such as Financial Aid Offices, the GI Bill, EducationQuest Foundation (a non-profit organization with a mission to improve access to higher education in Nebraska), as well as other local resources.

   Placement services are leveraged between DVOPs and the partnering programs, such as WIOA, Wagner-Peyser, Vocational Rehabilitation, etc. The program staff that have served the veteran or other eligible person, communicate with each other to maximize placement services to achieve the greatest possible outcome of sustainable employment.

The items above are measured through

- Federal reporting of the Veterans Entered Employment Rate (EER)
- Referrals to Service Provider through the NEworks system
- File reviews for quality of services provided and IEPs developed

This information can be quantified and assessed for quality programing. Areas for improvement will be identified and staff training for program improvement will conducted.

(d) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff

Staff	Program	Hire Date*	Mandatory Training Completion Date
Dave Alder	DVOP	12/16/2013	6/3/2014

Cody Christ	DVOP	9/15/2015	3/14/2017
Art Davis	DVOP	8/12/1996	8/30/2011
Leah Good	DVOP	3/23/2015	9/22/2016
Sandy Grigg	DVOP	3/3/1997	1/12/1998
Jose Palacios	DVOP	7/27/2015	3/1/2016
Brady Plunkett	DVOP	1/11/2016	10/10/2016
Dave Rangeloff	DVOP	8/12/1996	2/2/1998
Nina Rogers	DVOP	12/26/2009	11/22/2014
Alan Trook	DVOP	1/12/2015	7/31/2015
Josh Whited	DVOP	8/11/2014	6/5/2015
Terry Eklund	LVER	11/15/2014	12/4/2015
Harvey Hudson	LVER	1/17/2006	2/14/2012
Liem Tran	LVER	6/29/2015	3/1/2016

*Hire Date for State of Nebraska may not align with start date as a DVOP/LVER.

(e) Such additional information as the Secretary may require.

Nebraska's unemployment rate for May 2014 of 3.4% percent reflects a 0.4% decrease from the May 2013 rate of 3.8% and remains as one of the lowest rates in the nation. Nebraska's veterans compare favorably to non-veterans in the percent of individuals below poverty and in the labor force participation rate according to the 2012 American Community Survey 3-year estimates. In Nebraska, the percent of veterans below the poverty rate was 5.8%, and for non-veterans the rate was 12.0%. The rates for both veterans and non-veterans falling below the poverty line were below the national average. The labor force participation rate for veterans (81.2%) is slightly lower than for non-veterans (83.0%). The rates for the U.S. were 75.0% for veterans and 75.9% for non-veterans.

Ten Year Outlook: Nebraska's Super-Sector Industries

Nebraska's projected fastest growing industry for the 2012-2022 time period is Construction, with 2.27% annual growth and an additional 10,613 jobs. Professional and Business Services follows with an annual growth rate of 1.71% and job growth of 19,642 over the same period. Education and Health Services is expected to be the third fastest growing industry with an annual growth rate of 1.39% and an additional 34,402 jobs. Only two of the state's industries, Natural Resources and Mining and Information, are projected to lose jobs. It is expected that Natural Resources and Mining will shed 5,419 jobs in the ten-year period at a rate of -1.11% annually. Information, with jobs in publishing industries, broadcasting, and telecommunications, is projected to lose 272 jobs, a -0.16% annual loss.

Nebraska Industry Sub Sectors Industries

Found within the Education and Health Services super-sector, Ambulatory Health Care Services is expected to add the most jobs by 2022 (11,531, 2.88% annually). In fact, four out of the top ten industries are found in this super-sector.

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Education Employment for private, state and locally run schools, Nursing and Residential Care Facilities, and Social Assistance also make the list. These increases are due in part to the aging population of the state; as people age, their health care needs tend to increase. Another factor is many workers in this field are reaching retirement age. According to Quarterly Workforce Indicators data provided by the Census in the third quarter 2013, 31.1% of workers in Educational Services were 55 and over and 22.8% of workers in Health Care and Social Assistance were 55 or over. In comparison, 21.7% of workers in the state were 55 or over.

All three of the industries that make up the Professional and Business Services super sector are in the top ten growing industries. Professional, Scientific and Technical Services are expected to add 9,425 jobs and grow 2.02% annually. Administrative and Support Services are expected to grow by 4,848 jobs, a 1.09% change annually. Management of Companies and Enterprises are expected to add 4,844 jobs and increase 2.30% annually.

Only thirteen of the ninety-three sub-sector industries are expected to decline. The largest decline is expected in Crop Production where a loss of 3,268 jobs is expected, a -1.67% annual decline.

10 Year Occupational Growth Outlook

The fastest growing occupation of the top 25 ranked high-wage, high-skill, and high-demand (H3) occupations is Market Research Analysts and Marketing Specialists with a projected percentage increase of 30.4% adding 955 jobs in the next 10 years. The second fastest growing top 25 H3 occupation is Physical Therapists by 29.7% adding 443 jobs by 2022.
The number one ranked overall H3 occupation is Heavy and Tractor-Trailer Truck Drivers with an estimated increase of 4,716 jobs, a 16.8% increase. Registered Nurses come in at number two on the list adding 2,739 jobs, a 12.4% increase. Carpenters come in at number three, with the fastest growth rate of the top five anticipated to increase by 23.2% and adding 2,274 jobs. Rounding out the top five H3 occupations are Accountants and Auditors (13.4%; 1,323 jobs) and General and Operations Managers (12.0%; 1,334 jobs).

In general, this data appears to support a positive employment outlook for Nebraskans. However, upon analysis, training duration, licensure requirements, work environment, geographic location, and regional wage projections vary greatly between these occupations, presenting challenges to the state's veteran population.
Collectively, job orders posted in PY2013 increased 19.5% over PY2012 while veteran labor exchange registrations decreased by nearly 7% respectively. Veteran registrations posted through June 2013 comprise approximately 2% of all NDOL location registrations showing a decrease of 2% from the previous year.

Employer services are a priority for the Nebraska Department of Labor and are tracked through the public labor exchange statewide management information reporting system, NEworks. All NDOL locations have one or more (dependent on service area size) Wagner-Peyser Staff whose primary responsibilities include conducting employer outreach, developing business

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relationships, networking and providing employment, training and placement information for all NDOL partners with targeted employers and their associations.

Wagner-Peyser staff emphasize the benefits of hiring veterans when talking to employers. Disabled Veterans Outreach Program Specialist (DVOP) and Local Veteran Employment Representatives (LVER) staff, as appropriate, offer an additional level of support to Wagner-Peyser staff by providing detailed information and assistance regarding the local veteran labor pool or individual veterans seeking employment. The above strategies will assist NDOL with the promotion, hiring and retention of Nebraska veterans.

Unemployment Insurance

A. Overview

FY 2015 saw a continued decrease in workloads decrease from FY 2014 levels. Nebraska continues to make processing benefit claims accurately a priority as well as continued improvement in all performance measures. UI Program Integrity continues to be an area of emphasis in Nebraska as is demonstrated through the Integrity Action Plan included in this submittal.

During FY 2015 the State Information Data Exchange System (SIDES) was implemented. Both broker and SIDES E-Response went in production midway through FY 2014. *The Interactive Voice Response (IVR) system currently used by the UI Benefits system utilizes an unsupported operating system. Over several years Nebraska staff have been working on development to participate in the State of Nebraska IVR solution. Implementation is anticipated in CY 2014.*

In 2015 the UI Tax system entered into its second year of the Treasury Offset Program (TOP). Changes to state statute were made for both Benefits and Tax allow for the use of TOP as a means to collect outstanding debt. Implementation of TOP for Tax is scheduled for end of CY 2015. LB 961 passed the Nebraska legislature and was signed by the Governor during the 2014 legislative session. The legislation adds the short time compensation program to Nebraska statute. UI staff are analyzing this legislation so that implementation can occur in CY 2016.

Nebraska focused UI Program integrity efforts on decreasing improper payments resulting from Job Service Registration, Work Search Issues, and Benefit Year Earnings. As a result of several integrity initiatives in collaboration with IT projects, improper payments attributable to registration and benefit year earnings have seen remarkable declines, as well as an overall decrease in Nebraska's improper payment rate. Nebraska's overall improper payment rate has decreased from 24.38% to 14.52%. While these numbers indicate significant progress has been made toward restoring the public trust in UI, Nebraska recognizes there is still more work to be done. FY15-16 presents an opportunity to pivot integrity projects from detection and recovery to long-term solutions in prevention and reduction. Nebraska intends to focus on significant projects aimed at a continued decrease in improper payments while sustaining high levels of achievement in core measures, notably overpayment detection and recovery.

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UIConnect, Nebraska's employer portal allows employers to register for a UI Account, file and pay UI Combined Tax and Wage reports, file UI Benefits separations, Appeals and Benefit Payment Audits. In early 2015 employers were given the opportunity to register for SIDES E-Response through UIConnect. Nebraska employers may file UI Combined Tax Reports electronically using UIConnect or Bulk filing or by paper. For the first quarter 2015, 47,517 combined tax reports (85%) were filed electronically of which 28,948 (60.92%) were filed via UIConnect. Approximately 90% of payments were received electronically and 97% of wage items.

Nebraska recognizes the importance of maintaining a solvent trust fund. An array system has been used since CY 2006 to determine employer combined tax rates. The trust fund balance dropped below the solvency range for the CY 2010 and 2011 rates. The trust fund balance returned to solvent range for CY 2012 and above the solvency range for CY 2013 through 2015 allowing for the expected yield to fall below prior year benefit payments.

B. Federal Emphasis and GPRA Performance Goals

Improving State Capacity to Administer and Operate the UI Program Effectively

During FY 2014 Nebraska has experienced a reduction in workload moving to more typical levels. This has given the state an opportunity to update system processes and technologies that were delayed during the Great Recession. The UI Benefits program will begin using the state IVR solution in the next few months replacing a system that is functioning on obsolete equipment.

Recent Supplemental Budget Request opportunities have given Nebraska the funding to expand and improve our integrity efforts as outlined in our Integrity Action Plan. During FY 2015, the use of additional merit staffing to detect improper payments have assisted in improving Nebraska's performance.

The increased workloads over the past few years have reduced our capacity to maintain training efforts at a desired level. We recognize the importance of maintaining a knowledgeable UI staff and the risk of loss as senior staff begin to retire. A renewed emphasis on training was begun during FY 2015 as REX and other technologies were deployed.

Improving Prevention, Detection, and Recovery of UI Improper Payments

Integrity is a high priority in Nebraska. FY 2015 was the third year for the Treasury Offset Program (TOP). Supplemental Budget Requests have given us an opportunity to continue to enhance detection methods. As outlined in our FY 2015-2016 UI Program Integrity Action Plan, the various detection and recovery efforts which were developed and tested.

Improving Program Performance Nationally

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Nebraska experienced a decrease in performance during the Great Recession similar to other states. Over the course of FY 2015 we continued to work hard to meet performance standards. The Field Audit total wages changed continues to improve but has not yet met the desired standard. Additional methods to detect total wages changed will be explored during FY 2016. Program performance continues to be a priority in Nebraska and we will continue to work to exceed performance targets.

Reemployment of UI Claimants

Reemployment Services continues to be provided through the service delivery system at the American Job Centers. Employment and Training staff at the Nebraska Department of Labor is committed to continuous improvement and collaboration with Unemployment Insurance staff. Process improvements to utilize reemployment services throughout the claim were begun midway through FY2015. During second quarter, Employment and Train reached acceptable levels of performance. Work continues to increase employment levels for claimant and reduce the number of benefit weeks experienced.

Addressing Worker Misclassification

The detection of misclassified workers continues to be a high priority in Nebraska. Beginning in 2003, Nebraska has utilized the resources made available through the IRS 1099 Extract File. Identifying employers that are typically problematic in specific industries by use of NAICS Codes and cross referencing to the 1099 Extract File, Nebraska has been successful in locating misclassified workers. This process also lends to the opportunity of educating the employer community regarding correct classification of workers. In addition, misclassified workers are also detected and reclassified through the obstructed UI claims process.

The misclassified worker information is shared with the IRS through the Questionable Employment Tax Practices (QETP) program. Nebraska is one of twenty-nine states that shares information through this process. The misclassified information is also shared with the Nebraska Department of Revenue and the Nebraska Contractor Registration so that all phase of worker misclassification are addressed.

GPRA Goals

Make Timely Benefit Payments: Target – 87%; Nebraska Performance – 89.2%

Nebraska continues to place a high level of emphasis on timely benefit payments. During the recent recession Nebraska struggled as most states have with timely benefit payments. During FY 2014 the GPRA performance has been met.

Detection of Overpayments: Target – 54.2%; Nebraska Performance 65.89%

Nebraska continues to focus on goals to meet this measure. Nebraska's Benefit Payment Control Unit (BPC) has been actively involved in the UI Integrity Cross-Functional Task Force

since fall 2011. As a result, BPC management and employees have engaged in cross-sectional analyses and discussion of integrity related issues, including furthering employee understanding of BAM, benefits adjudication, fraud determinations and the importance of clear messaging when communicating with employers and claimants. This process has provided for increased focus on detecting overpayments earlier and more efficiently, evidence by an overall increase in the overpayment detection rate since October 1, 2011.

Establish Tax Accounts Promptly: Target – 88.9%; Nebraska Performance – 92.6%

Prompt status determinations continue to be a priority in Nebraska.

Facilitate the Reemployment of Claimants: Target – 68%; Nebraska Performance – 65%

Reemployment Services will continue to be provided through the service delivery system at NDOL Locations, American Job Centers (AJCs), and through the virtual service unit. Development and coordination of NEres begun. NEres is an integrated reemployment model that will effectively utilize resources and offer employment services at a larger capacity and within an effective timeframe. Employment and Training staff at the Nebraska Department of Labor is committed to continuous improvement and collaboration with Unemployment Insurance staff.

NEres will provide uniform services to all WPRS and REA profiled individuals with a long-term goal of serving all initial UI claimants with NEres services. NEres activities will be monitored via the Management Information System. Program Administration and Management will provide oversight of activities and services provided to target populations. Reports will be run from the MIS on a regular basis to ensure data integrity and program compliance.

C. Program Review Deficiencies

N/A

D. Program Deficiencies

N/A

E. Reporting Deficiencies

Report Timeliness – ETA 9057 Lower Authority Appeals Quality Review

Changes made during FY2014 continue to ensure timely filing of quarterly reports. The data compilation process was streamlined by allow tribunal staff to manage sample extraction. This change allowed for reports and related documents to be retrieved timely. Additionally, due dates are now calendared electronically to ensure timely review and submittal of reports.

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F. Customer Service Surveys

N/A

G. Other

Background: On August 5, 2010, the Nebraska Department of Labor (NDOL) received a Supplemental Budget Request (SBR) award of $432,142.00 to improve unemployment insurance (UI) information technology (IT) contingency plans and UI IT security. The application for the award specifically referenced NDOL's security risks as identified by audits. The award allowed NDOL to address four components of UI IT security, as follows:

1. Update and test the UI IT contingency plan according to the NIST SP 800-34 and conduct an Independent Verification and Validation (IV&V) on the updated plan
2. Conduct an IT Security Assessment in accordance with the FIPS 200/NIST SP 800-53 and NIST SP 800-53A for the assessment of Security Control Effectiveness. The assessment will include an update of *iSecure 2007*
3. Address priority risk areas identified in the *iSecure* update
4. Upgrade the authentication and verifications systems utilized for UI

In accordance with ET Handbook 336, 18th Edition, Change 2, NDOL instituted plans or measures to comply with SQSP Assurance requirements, as follows:

Assurance H. Assurance of Contingency Planning

Utilizing 2010 SBR funds, NDOL contracted with a CIP-certified IT consulting company to update and test the UI IT contingency plan according to the NIST SP 800-34 standard. The project was completed in November 2011, and the contingency plan was updated to document processes and procedures to recover and protect the UI data, assets and facilities in the event of a disaster. 2010 SBR funds were also used to procure hardware and software for implementation of a UI IT disaster recovery (DR) cold site at The University of Nebraska Medical Center (UNMC) in Omaha, NE, situated 50 miles away from our primary data center. Implementation of the DR site was completed in September 2012, and the contingency plan was updated and tested to include the addition of the disaster recovery site. In 2012, NDOL contracted services for an Independent Verification & Validation (IV&V) of the UI IT contingency plan, which was completed in December 1, 2012. The UI IT contingency plan is updated uniformly with changes in the UI IT environment, but at least annually so as to be in a ready state for use immediately upon notification.

NDOL conducted table top DR exercises on November 16, 2012 and put the structure in place to review, update, and test the UI IT Contingency Plan annually to ensure availability of critical assets and overall operational readiness for unexpected disruptions. NDOL had an unplanned test of the UI IT Contingency plan on April 23, 2013 due to a 2-hour power outage. The incident was fully documented and outcomes included action to be taken for improvement. ~~Future~~

NDOL procedures include Table Top DR, Functional and Full-Scale tests, which are scheduled in compliance with IRS Publication 1075 and NIST requirements and strengthen the agency's ability to recover in the event of an emergency or system disruption.

NDOL also conducts scheduled inspections of the state Data Center, off-site storage and disaster recovery site annually, in compliance with IRS Publication 1075 and NIST requirements to ensure security protocols are in place for the protection of information and information systems.

Under UIPL 13-14, NDOL applied for SBR funds to update the UI Contingency Plan. The next scheduled review and update is due November 2014.

Assurance J. Assurance of Automated Information Systems Security

Background - Over the last nine (9) years, NDOL completed several initiatives that have been valuable to the security needs of the agency. The first initiative, Strategic Technical Architecture Roadmap, STAR – V2.0 provided a point-in-time assessment of the current level of technical maturity and recommendations on how to achieve a future state technical architecture. Other initiatives, *iSecure 2004* and subsequent *iSecure 2007 IT Security Risk Self-Assessment*, used the security section of STAR as a springboard to perform the high level analysis and review of the security environment of the agency.

Utilizing 2010 SBR funds, NDOL contracted with an independent, CIP-certified firm to conduct an update of *iSecure 2007. iSecure 2011* was completed on November 10, 2011, including documented policies and procedures, along with recommendations for addressing deficiencies and security management effectiveness. The *iSecure Assessment* is in accordance with the FIPS 200/NIST SP 800-53 and NIST SP 800-53A security guidelines.

In February 2012, NDOL hired an independent consultant to facilitate the process of conducting the NIST Self-Assessment and completing the System Security Plan (SSP). The self-assessment identified additional controls, policies and procedures to be addressed in NDOL's Plan of Action and Milestones (POA&M) documentation. The SSP documents each control and responsible parties. This ongoing process documents all corrective actions identified during internal inspections and security assessments and assigns a risk category to each so the most critical are addressed immediately, with measured progress towards resolving all defined gaps or findings. NDOL uses security and risk assessments as a best practice to ensure that appropriate levels of controls exist, they are being managed, and they are compliant with all federal and state laws or statutes.

NDOL performs ongoing monitoring of all UI systems in accordance with documented policies and procedures from the *iSecure 2011* update. All documentation is reviewed and updated at a minimum annually. Every three years, NDOL conducts a formal independent UI IT security risk assessment ensuring vulnerability management and policy compliance. Under UIPL 13-14,

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NDOL applied for SBR funds to complete *iSecure 2014,* the security risk assessment for 2014, aligning with our three-year requirement.

NDOL uses security tools. The Veracode tool identifies software vulnerabilities across UI systems. This tool helps to prevent threat posed by hackers who are targeting software vulnerabilities to gain access to critical data. NDOL conducted a series of scans on UI systems, which provide categorized analytics to improve performance. NDOL uses the outcomes to mitigate application risk at the code level. NDOL's system security plan clearly defines procedures and timelines for conducting scans for risk management and audit compliance. The LogRhythm tool collects a complete set of data from the IT environment for processing and analysis of relevant information from multiple dimensions, allowing NDOL to perform real time threat management. Logs are reviewed continually to detect and respond to breaches and threats. Microsoft System Center Configuration Manger is used for remote control, patch management, software distribution, operating system deployment, network access protection, and hardware and software inventory capabilities.

NDOL's security team meets monthly to review the POA&M and discuss security-related projects or activities. Changing technology requires conscientious and steady assessment of the System Security plan. In strict compliance with legislation, regulations and other applicable requirements, NDOL is committed to compliance with NIST SP 800-53 Recommended Security Controls for Federal Information Systems and Organizations.

NDOL's security and risk assessment policy addresses purpose, scope, roles, responsibilities, management commitment, coordination among agency entities, and compliance; and procedures to facilitate the implementation of the risk assessment policy and associated risk assessment controls. The policy is reviewed and updated every three years; procedures at least annually.

In 4th Quarter 2014, NDOL will hire an Agency Security Officer and utilize SBR or program funds to further train staff in NIST security and privacy controls for the protection of information and information systems.

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CORRECTIVE ACTION PLAN

State:	Federal Fiscal Years:	MEASURE/PROGRAM AREA:
NEBRASKA	FY 2015 – FY 2016	Effective Audit Measure

Current Performance Level:	Projected Performance Levels:							
1.1%	1.2%	1.3%	1.4%	1.5%	1.6%	1.8%	1.9%	2.0%
	12/31/14	3/31/15	6/30/15	9/30/15	12/31/15	3/31/16	6/30/16	9/30/16

SUMMARY:

The detection of misclassified workers continues to be a high priority in Nebraska. Beginning in 2003 Nebraska has utilized the resources made available through the IRS 1099 Extract File. Identifying employers that are typically problematic in specific industries by use of NAICS Codes and cross referencing to the 1099 Extract File, Nebraska has been successful in locating misclassified workers. This process also lends to the opportunity of educating the employer community regarding correct classification of workers. In addition, misclassified workers are also detected and reclassified through the obstructed UI claim process.

The misclassified worker information is shared with the IRS through the QETP (Questionable Employment Tax Practices) program. Nebraska is one of twenty-nine states that shares information through this process. The misclassified information is also shared with the Nebraska Department of Revenue and the Nebraska Contractor Registration program so that all phases of worker misclassification are addressed.

However, with this comes some challenges to Nebraska. As a "small state" in terms of liable employers, 55,643, and the fact that 80 percent of the liable employers have less than ten workers we are challenged to meet the second criteria of UIPL 30-10 which is the Percent of Total Wage Change from Audit as evidence by the results of the 2011 – 2013 Performance Audit Measures. Nebraska has embraced the challenge to meet the second audit measure by expanding an audit detection measure to include the contractor registration database. The focus is to cross reference corporations and those contractors who had employees with our Tax Management System (TMS). When matches didn't occur a status assignment is created. We have had some success setting up new employers, that success did not translate into a significant change in total wages.

{✓} If continued, check box

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Effective Audit Measure Summary Continued

CY 2014 will show some gains in the audit measures but the change in total wages will continue to be an issue. Nebraska has a very limited number of large employers thus we will never have the WOW factor other states have experienced. We plan to expand the use of the 1099 Extract File to include Nebraska employers who issue 1099s but do not have a UI Account Number assigned to them. We will perform the audit concurrently with the status investigation. The expected result will be an increase in the percent of Total Wages changed from the audit as the liable employer previously filed nothing.

	Completion Date*							
	12/31	**03/31**	**06/30**	**09/30**	**12/31**	**03/31**	**06/30**	**09/30**
1. The UI Tax Section will work closely with the Contractor Registration program to explore potential misclassified workers and changes in total wages.	✓	✓	✓	✓	✓	✓	✓	✓
2. Expand the use of the 1099 Extract File in audit process to include employers that don't have a Nebraska UI Account Number.	✓	✓	✓	✓	✓	✓	✓	✓
3. The UI Data Warehouse will be utilized to potential under reporting based on employer characteristics found in audits.	✓	✓	✓	✓	✓	✓	✓	✓
4. The Effective Audit Measures will be emphasized in the annual Field Meeting.			✓				✓	
5. Individual Field Representative performance for all four audit measures will be monitored. Individual audit goals will be established to achieve a passing score for all Effective Audit Measures.	✓	✓	✓	✓	✓	✓	✓	✓

CORRECTIVE ACTION PLAN

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State: NEBRASKA	Federal Fiscal Years: FY 2015 – FY 2016	MEASURE/PROGRAM AREA: Facilitate Reemployment Criteria: 68%

Current Performance Level:	Projected Performance Levels:							
Met Measure	65.4%	MET	_____	_____	_____	_____	_____	_____
	12/31/14	3/31/15	6/30/15	9/30/15	12/31/15	3/31/16	6/30/16	9/30/16

SUMMARY: Reemployment Services will continue to be provided through the service delivery system at NDOL Locations, American Job Centers (AJCs), and through the virtual service unit. Development and coordination of NEres begun. NEres is an integrated reemployment model that will effectively utilize resources and offer employment services at a larger capacity and within an effective timeframe. Employment and Training staff at the Nebraska Department of Labor is committed to continuous improvement and collaboration with Unemployment Insurance staff.

NEres will provide uniform services to all WPRS and REA profiled individuals with a long-term goal of serving all initial UI claimants with NEres services. NEres activities will be monitored via the Management Information System. Program Administration and Management will provide oversight of activities and services provided to target populations. Reports will be run from the MIS on a regular basis to ensure data integrity and program compliance.

	Completion Date*							
	12/31	03/31	06/30	09/30	12/31	03/31	06/30	09/30
1. Development of NEres to provide uniform services to all WPRS and REA profiled individuals with a long-term goal of serving all initial UI claimants with NEres services.	✓							
2. Implement WPRS portion of NEres.	✓							
3. Implement REA portion of NEres.	✓	✓	✓	✓	✓	✓	✓	✓
4. Begin work on serving all initial UI Claimants with NEres services; to be identified by their initial claim filing.	✓							
{✓} If continued, check box **Facilitate Reemployment Continued**								

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5. Eventually transition to allowing all job seekers and discretionary grant participants to receive NEres services.	✓	✓	✓	✓	✓	✓	✓	✓
6. Identify initial UI claimants registered in NEworks in a timely fashion in order to provide early intervention and employment services.		✓						
7. Promote online services to better serve the needs of jobseekers that do not have direct access to American Job Centers or NDOL locations.	✓	✓	✓	✓	✓	✓	✓	✓
8. Conduct initial staff training to implement NEres. Includes, but is not limited to: client services and activities; NEworks; reporting; assessments; referrals; target populations, etc.	✓							
9. Provide resources and training to Employment Services staff to allow them to better serve the unemployed job seeker and promote a more immediate timeframe in which the claimants can reenter the workforce.	✓	✓	✓	✓	✓	✓	✓	✓
10. Maintain relationships with UI to share information and data to aid in the outreach and identification of UI claimants	✓	✓	✓	✓	✓	✓	✓	✓

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CORRECTIVE ACTION PLAN

State: NEBRASKA	**Federal Fiscal Years:** FY 2015 – FY 2016	**MEASURE/PROGRAM AREA:** Improper Payments Measure **Criteria:** <10%
Current Performance Level:	**Projected Performance Levels:**	

Met Measure	<10% 12/31/14	<10% 3/31/15	<10% 6/30/15	<10% 9/30/15	<10% 12/31/15	<10% 3/31/16	<10% 6/30/16	9/30/16

SUMMARY:

Nebraska has worked diligently to decrease the Improper Payment rate in UI Benefits since 2011. Focusing on IT solutions to deficient operational areas causing improper payments, including JS Registration (5.18%) and Work Search (10.12%), as well as recovery operations in 2013, UI Benefits improper payments fell from 24.13% in IPIA year 2012 to 18.16% in IPIA year 2013.

While such a reduction shows progress, Nebraska has taken additional steps to meet the Improper Payments Measure in FY13 and first part of FY14, yielding an IPIA Improper Payment rate of 9.114% by the end of CY13. Nebraska is confident that continued analysis combined with SBR-funded IT and programmatic development will improve on this vital integrity measure. Such analysis is but one action of many which will be undertaken to improve performance, including specific data warehouse research and analysis for prevention activities; work search auditing and analysis to determine areas of weakness in the operational requirement and future messaging based on these findings; targeted information campaigns increasing awareness of registration requirements; and recovery methodology analysis and enhancements.

The FY15-16 SQSP is the first time Nebraska has been under a corrective action plan for this measure.

Success will be measured for this plan not just by the completion of the milestones below and the attainment of an improper payments measure of <10% but, as well, by the ongoing sustainment of a low rate. To achieve this vision, Nebraska BPCU and Internal Security personnel will be responsible for monitoring, analyzing, and assessing data and projects in the near and long-term future. Findings will be reported directly to the UI Administrator for Benefits Operations including status updates on current improper payments as well as recommendations for program development oriented towards keeping Nebraska's improper payments measure well below the established criteria requirement.

	Completion Date*							
MILESTONES	**12/31**	**03/31**	**06/30**	**09/30**	**12/31**	**03/31**	**06/30**	**09/30**
1. Ongoing focus on recovery activity: Nebraska currently recovers >73% of established overpayments, in large part due to structural efficiencies in the Benefit Payment Control Unit.								

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Nebraska will continue to emphasize recovery as a priority, consistent with the Secretary's National Priorities.	√	√	√	√	√	√	√	√
2. Quarterly assessment of BAM data with UI Benefits management staff.	√	√	√	√	√	√	√	√
3. Research and analysis of enhanced recovery options. Nebraska plans to implement online credit card payment options in FY15. Additionally, if awarded SBR funding in 2014 (pending approval), Nebraska will immediately utilize data warehouse query capability to enhance targeted collection measures.	√	√	√	√	√	√	√	√
4. Analysis of CY14 IPIA data		√						
5. Development and implementation of enhanced recovery solutions (e.g., online credit card payments), pending approval of 2014 SBR application.				√				
6. Analysis of FY15 IPIA/BAM data.					√			
7. Analysis of CY15 IPIA data						√		

CORRECTIVE ACTION PLAN

State: NEBRASKA	**Federal Fiscal Years:** FY 2015 – FY 2016	**Measure/Program Area:** Data Validation **Criteria: Submissions June 10, 2014**

Current Performance Level:	**Projected Performance Levels:**							
Benefits Populations: *Submitted but Failed Benefits Population 14*	_____	_____	**Pass 14**	_____	_____	_____	**Pass 14**	_____
	12/31/14	**3/31/15**	**6/30/15**	**9/30/15**	**12/31/15**	**3/31/16**	**6/30/16**	**9/30/16**

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SUMMARY:
Nebraska submitted all required Benefits Populations for Data Validation timely in VY14 (due June 10, 2014 for the period April, 2013-March, 2014). Population 14 failed due to discrepancies between reported and validation in groups 14.01 and 14.02, specifically 227 reports cells corresponding in both groups with Accounts receivable >=451. Sample validation passed in both groups. Notably, Nebraska has applied for 2014 SBR funds to address this specific Data Validation issue from a programmatic and IT perspective. In FY15 and FY16, Nebraska will continue research and analysis on both the report cells and extract files to determine an IT solution to discrepancies.

All populations due will be submitted by June, 2015, and June, 2016 (if required).

MILESTONES (Numbered Sequentially)	**Completion Date***							
	12/31	**03/31**	**06/30**	**09/30**	**12/31**	**03/31**	**06/30**	**09/30**
1. Ongoing review of ET227 data (quarterly)	√	√	√	√	√	√	√	√
2. Establishment of a BPCU Data Integrity Workgroup	√							
{✓} If continued, check box **Data Validation Measure Continued**								
3. Data analysis of VY14 extracts and quarterly ET227 (April, 2013-March, 2014), section E, and ET 401 manual, sections IV-3-2 through IV-3-17 (as revised January, 2012)		√						
4. Extracts and Reports Development/VY15 submission			√					

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5. Data analysis of VY15 extracts and quarterly ET227 (April, 2014-March, 2015).				√				
6. Ongoing analysis and development of ET227 reports and populations 12-15 (specifically those that fail in VY15)				√	√	√	√	√

CORRECTIVE ACTION PLAN

State: NEBRASKA	**Federal Fiscal Years:** FY 2015 – FY 2016	**MEASURE/PROGRAM AREA:** BAM Criteria: Outside of -10.0 and 5.0

Current Performance Level:	**Projected Performance Levels:**							
Benchmark Population outside of the control	**-12.5**	**-12.0**	**-11.5**	**-11.0**	**-10.5**	**-10.0**	**-9.5**	**-9.0<BP>5**
Paid Claims -13.01%	**12/31/14**	**3/31/15**	**6/30/15**	**9/30/15**	**12/31/15**	**3/31/16**	**6/30/16**	**9/30/16**

SUMMARY: Paid Claim Benchmark populations are outside the control -10 and +5%. It is apparent paid weeks have been incorrectly excluded from the BAM populations. The BAM Supervisor IT and UI Administrator will undertake a thorough analysis of paid weeks included and excluded from the BAM population in order to identify where the error(s) may exist. We have identified that all out-of-state residence addresses had been excluded, despite NE liable indicators and changes to the program were implemented effective 5/21/2014. This initial step should impact the -13.01% variance and significant improvement should be seen by 4th quarter 2014 with ongoing review based on variance reports. We propose to continue our review of weeks included and excluded to identify any other exclusions and will monitor our BAM population against the 5159 weeks paid following the end of each quarter. Additional program adjustments will be made based on regular quarterly analyses until such time as the BAM population is within tolerance parameters. If unexplained results persist BAM will communicate with regional/nation office for further technical support

	Completion Date*							
	12/31	**03/31**	**06/30**	**09/30**	**12/31**	**03/31**	**06/30**	**09/30**
1. Implementation of inclusion interstate / commuter county address.	√	√	√	√	√	√	√	√

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2. Analysis of weeks paid and dollars payable from quarterly 5159 and BAM extract file comparable weeks	√	√	√	√	√	√	√	√
3. Continued issues into program year will result in consultation with program experts for technical support		√	√	√	√	√	√	

CORRECTIVE ACTION PLAN

State: NEBRASKA	**Federal Fiscal Years:** FY 2015 – FY 2016	**MEASURE/PROGRAM AREA:** BAM Benchmark Population outside of the control Criteria: >±15%

Current Performance Level:	**Projected Performance Levels:**							
Benchmark Population outside of the control								
Denied Monetary -46.35%	-46.35%	-30.00%	-27.00%	-25.00%	-22.00%	-20.00%	-17.00%	+/-14.00%
Denied Separation Met Measure	-21.15%	-20.00%	-19.00%	-18.00%	-17.00%	-16.00%	-15.00%	+/-14.00%
Denied Non-Separation - Met Measure	-20.25%	-20.00%	-19.00%	-18.00%	-17.00%	-16.00%	-15.00%	+/-14.00%
	12/31/14	**3/31/15**	**6/30/15**	**9/30/15**	**12/31/15**	**3/31/16**	**6/30/16**	**9/30/16**

SUMMARY: Denied Claim Benchmark populations are outside the control +/-15%. It is apparent denials have been incorrectly excluded from BAM denial populations. The BAM Supervisor, IT staff and UI Administrator will undertake a thorough analysis of denials included and excluded from the BAM populations in order to identify where the error(s) may exist. We have identified that all out-of-state residence addresses had been excluded, despite NE liable indicators and changes to the program were implemented effective 5/21/2014. We identified that some denials were being excluded from the population based on an error regarding the transaction date. We have corrected that error in the program effective 5/21/2014 so denials that fall into the batch period are now being included. This initial step should impact our variance on Monetary Denials, Separations and Non-Separations. We expect to see significant improvement by 4th quarter 2014. We propose to continue our review of denials included and excluded to identify any other exclusions and will monitor our DCA populations against Benchmarks quarterly. Additional adjustments will be made based on those regular quarterly analyses until such time as the Denial Populations are

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within tolerance parameters. If unexplained results persist, BAM will communicate with regional/national office for further technical support.								
	Completion Date*							
	12/31	**03/31**	**06/30**	**09/30**	**12/31**	**03/31**	**06/30**	**09/30**
1. Implementation of inclusion interstate /commuter county address.	√	√	√	√	√	√	√	√
2. Implementation of inclusion of correct Transaction date {✓} If continued, check box	√	√	√	√	√	√	√	√
Benchmark Population outside of the control Measure Continued 3. Analysis of denial populations and benchmark Populations	√	√	√	√	√	√	√	√
4. Continued issues into program year will result in consultation with program experts for technical support	√	√	√	√	√	√	√	√

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Attachment B

Unemployment Insurance (UI) Program Integrity Action Plan

State: NEBRASKA	Federal Fiscal Year: 2015

Root Causes:
The top three root causes of improper payments in Nebraska for the most recent IPIA period and percentage change for each cause compared to the prior year's IPIA rate.

2013 IPIA (BAM Batches 201227-201326) and the percentage change from IPIA 2012:
Work Search Issues 10.12% (+8.97%)
Job Service Registration 5.18% (-10.1%)
Benefit Year Earnings 2.79% (-0.89%)

Accountable Agency Official(s):
Evan Littrell, UI Administrator, Benefits Operations

Summary:
Nebraska has designed an integrity action plan that moves forward with short-term and long-term, substantive integrity actions designed to decrease and stabilize the UI Benefits improper payment rate. Consistent with themes of prevention, detection, reduction, and recovery, the plan offers initiatives driving a structural build combining elements of detection and recovery (short-term) and prevention and reduction (long-term). This two-tiered strategic plan blends the resources available from Program and IT professionals in an effort to maximize and effect lasting positive changes to the integrity of the Nebraska UI Benefit Program. Nebraska is dedicated to reducing improper payments not simply on the top three root causes but, rather, across all causes the agency may impact.

Recognizing the inherent advantages of transparency and communication, Nebraska will provide the Integrity Action Plan for FFY 2015-2016 to all UI Benefits staff, incorporating front-line and management staff in project planning, training sessions, and sectional team meetings. Beyond the UI Benefits program, the Nebraska Commissioner of Labor will be provided with executive level updates as deemed appropriate by the UI Administrators for Tax and Benefits, encouraging a single agency integrity message. Finally, public press releases and employer information dissemination will be provided at the Commissioner's discretion to increase public confidence in the Nebraska Department of Labor's UI Program integrity.

Outcomes in FY 2014 IAP have been largely successful. Several strategies have been or will soon be implemented, including the creation of an integrated Agency Strategic Plan; UI Benefits management-directed integrity training, information and data exchanges; NDNH notification letter and audit procedure emphasis; implementation of SIDES; production implementation of the Integrity Data Warehouse; UCX/MSDES operations; staff emphasis on integrity operations; and social media messaging. Due to project timelines, several strategies have been combined into the REX project to create a single front-end to UI and ES in Nebraska. REX has incorporated the following strategies:

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language translation, earnings calculator, BRI language and fact-finding enhancements, and other UI/ES cooperative projects. The master project is scheduled for completion in 2016. Finally, resource overlap was the single greatest barrier to project completion in 2014. Nebraska is in the process of organizing a Project Management Office (PMO) to streamline project management, from initiation to completion.

The strategies below indicate (as appropriate) SBR funds already

Strategies	Actions	Targets and Milestone	Resources
Prevention/Reduction, Detection/Recovery (BYE, Fraud): Integrity Data Warehouse Enhancements (2014 SBR submission)	Contract an industry expert to enhance and analyze the current Nebraska Integrity Data Warehouse in an effort to equip NDOL staff with the skills and knowledge to create and maintain complex integrity queries.	Contractor and software procurement by December, 2014 Implementation: March, 2015 Ongoing research, development, and analysis: January 2015-September, 2016	IT personnel BPC personnel UI Benefits management/Data Users Group Outside vendor (for contractor/software)
Prevention (Staff/Data Integrity): Self-evaluation of programmatic and IT activity including Data Validation and Reports (2014 SBR submission)	Conduct research and implement IT solutions to improve the data quality of UI federal reports and data validation populations.	Research and development: March, 2015 (and ongoing) Implementation: June, 2015	IT personnel BPC personnel UI Benefits management/Data Users Group
Prevention (BYE, Work Search, JS Registration, Separations): Develop an integrity messaging campaign for employers and claimants (2014 SBR submission)	Design targeted information campaigns for employers and claimants aimed at reducing improper payments through understanding and cooperation. Actions will be ongoing and revised for effectiveness.	Ongoing development of targeted messaging campaigns, 2014-2016	Agency Public Information Officer Agency Procurement office Outside vendor for creation/distribution of media UI Benefits personnel and management

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			IT resources as needed
Prevention (Separations): Implementation of SIDES Web-services and E-response (SBR 13-03, enhanced messaging, 2014 SBR submission)	Develop an employer messaging campaign aimed to increase SIDES e-response participation to 35% of initial claim employers.	Campaign commence: March, 2015 Milestone: 35% employer participation in SIDES: March, 2016	IT personnel on the Benefit Payment System (BPS) UI Benefits management and personnel
Prevention/Detection (Work Search): Work Search auditing (2014 SBR submission)	Increase Call Center and Adjudication staff resources dedicated to Work Search audits/verification.	Implementation: December, 2014	IT personnel on the Benefit Payment System (BPS) Nebraska Claims Center Personnel
Prevention/Detection (Fraud/ID Theft): Integrity training utilizing the UI Benefits Online Training Center (OTC, initial build using SBR 13-01; enhancement to integrity specific staff training using 2014 SBR submission).	Using the Online Training Center (OTC) created from 2013 SBR funds, and requested funds in 2014 SBR submission, create training modules specific to integrity issues, including staff awareness of ID Theft indicators and other potential schemes intended to defraud UI Benefits.	Module design: December, 2014 Development: March, 2015 Implementation: July, 2015	BPC and UI Benefits personnel Contractor/vendor (for module design)
Prevention/Detection (BYE): Enhance NDNH detection measures. (2014 SBR submission)	Enhance the existing NDNH processing to include the immediate stoppage of payment for continued weeks filed following an NDNH report date.	Research, requirements, and development: March, 2015 Implementation: October, 2015	IT personnel on the Benefit Payment System (BPS) BPC Personnel
Prevention/Detection: IP Address Capture. This project will allow BPC personnel to investigate claims with suspicious IP Addresses allowing for earlier and effective	Develop an IT solution for capturing, storing, and conducting queries of IP Addresses from initial claims, weekly certifications, additional claims, claimant contact and demographic details changes, and other	Expected impact on improper payments: reduction in fraud related weeks and claims, early detection of	IT personnel on the Benefit Payment System (BPS) team; BPC personnel Outside vendor (as needed) for software

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detection of individual and collective fraud schemes. (SBR 13-04)	elements changing data on an UI claim.	fraudulent schemes. Implementation: June, 2015	
Detection (BYE): Implement enhanced crossmatches (SBR 13-04)	In conjunction with the BATS modernization project, expand cross-matching capability including the use of Nebraska Crime Commission (NCC) prisoner data, Do Not Pay portal, and ad hoc detection matches/investigations from the Integrity Data Warehouse queries.	Ongoing development: 2014-2015 Full implementation: October, 2015 (phased approach)	IT personnel for BATS and BPS IT Business Analyst BPC personnel and management
Detection/Reduction (BYE): Modernize legacy Benefits Audit Tracking System (SBR 13-04).	Utilizing SBR funds awarded in 2013, this project is ongoing to migrate the legacy Benefits Audit Tracking System (BATS) into the Benefits Payment System (BPS). This upgrade will enhance user abilities to detect and reduce UI Benefits overpayments.	Ongoing development: 2014-2015 Implementation: October, 2015	IT personnel for BATS and BPS IT Business Analyst BPC personnel and management
Reduction (BYE): Decrease the number of weeks and dollar amounts established in a BPC case established.	Utilizing the Integrity Data Warehouse (IDW) queries and implementation of BPC procedures and policy, reduce the number of weeks and dollar amounts per case established.	Policy implementation (completed; revisions pending success rates using ongoing ET227 data analysis). IDW enhancements:	IT and Contractor resources as necessary for IDW. BPC management and program analysts
Recovery: Enhanced collection methods such as Credit Card/Online payments.	Implement a methodology to accept credit card payments online. Adjust billing and collection techniques as appropriate	Research and implement credit card transaction capability, September, 2015.	IT Resources and Contractor/Vendor (to be determined). BPC management and program analysts/collections staff.

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OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [ ] New
- [x] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 10/01/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Nebraska Department of Labor

* b. Employer/Taxpayer Identification Number (EIN/TIN): 47-0491233

* c. Organizational DUNS: 8780724460000

d. Address:

* Street1: 550 South 16th Street
Street2:
* City: Lincoln
County/Parish: Lancaster
* State: NE: Nebraska
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 68509-4600

e. Organizational Unit:

Department Name: Department of Labor

Division Name: Unemployment Insurance

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.
* First Name: John
Middle Name:
* Last Name: Albin
Suffix:

Title: Commissioner of Labor

Organizational Affiliation:

* Telephone Number: 402-471-9912
Fax Number: 402-471-2318

* Email: John.Albin@nebraska.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

11. Catalog of Federal Domestic Assistance Number:

17-225

CFDA Title:

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Nebraska UI Base Grant FY 2016

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: NE 1-3
* b. Program/Project: NE 1-3

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2015
* b. End Date: 09/30/2016

18. Estimated Funding ($):

* a. Federal	14,214,759.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	14,214,759.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____.

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr.
* First Name: John
Middle Name:
* Last Name: Albin
Suffix:

* Title: Commissioner of Labor

* Telephone Number: 402-471-9912
Fax Number: 402-471-2318

* Email: John.Albin@nebraska.gov

* Signature of Authorized Representative:
* Date Signed: 09/04/2015

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View Burden Statement

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 06/30/2014

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.		$	$	$ 14,214,759.00	$	$ 14,214,759.00
2.						
3.						
4.						
5. Totals		$	$	$ 14,214,759.00	$	$ 14,214,759.00

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SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY (1)	(2)	(3)	(4)	Total (5)
a. Personnel	$	$	$	$	$
b. Fringe Benefits					
c. Travel					
d. Equipment					
e. Supplies					
f. Contractual					
g. Construction					
h. Other					
i. Total Direct Charges (sum of 6a-6h)					$
j. Indirect Charges					$
k. TOTALS (sum of 6i and 6j)	$	$	$	$	$
7. Program Income	$	$	$	$	$

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SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e)TOTALS
8.	$	$	$	$
9.				
10.				
11.				
12. TOTAL (sum of lines 8-11)	$	$	$	$

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	$ 14,214,759.00	$ 3,580,817.00	$ 3,526,562.50	$ 3,526,562.50	$ 3,580,817.00
14. Non-Federal	$				
15. TOTAL (sum of lines 13 and 14)	$ 14,214,759.00	$ 3,580,817.00	$ 3,526,562.50	$ 3,526,562.50	$ 3,580,817.00

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b)First	(c) Second	(d) Third	(e) Fourth
16.	$	$	$	$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	$	$	$	$

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges:
23. Remarks:	

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View Burden Statement

OMB Number: 4040-0007
Expiration Date: 06/30/2014

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
John H. Albin	Commissioner of Labor
APPLICANT ORGANIZATION	**DATE SUBMITTED**
Nebraska Department of Labor	09/04/2015

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Nebraska Department of Labor

Commissioner of Labor
John Albin

Office of General Counsel
Vacant
Legal Counsel

- Legal Service
  - Contract and MOU
  - Legal Review
  - Regulations
  - Legislative Liaison
- Unemployment Insurance Appeals
- Benefit Accuracy Measurement (BAM)
  - Paid Claims Accuracy (PCA)
  - Denial Claims Accuracy (DCA)
- Labor Laws
  - Wage and Hour
  - Contractor Registration
  - Monitor Advocate
  - Non-English Speaking Worker's Group
  - Farm Labor Contractors
  - Private Employment Agency
- Job Training Program Monitor

Office of Finance
Kim Schreiner
Director

- Fund Administration
  - Special Budget Requests
  - Reed Act
  - Contingent Fund
  - Program Funds
- Unemployment Insurance
  - Financial Reporting
  - Treasury
- NIS Administration
- Budget Development & Submission
- Biennial Budget & Deficit
- Accounting
  - NIS
  - Facility Costs (RUC)
  - Reconciliation of Accounts
- Cost Allocation Plans
- Financial Reporting

Office of Administrative Services
Terri Slone
Director

- Human Resources
  - Staffing
  - Payroll/Salary Administration
  - Employee Benefits
  - Employee Relations/EEO
  - Performance Management
  - Policy Development & Updates
  - Training & Development
- IT
  - Applications Support
  - Infrastructure Support
  - Project Management
  - Communications
  - Help Desk Support
  - Web Applications
- Public Information
  - Graphic Design
  - Audio, Video Productions
  - Press Releases
  - Publications
- Building and Grounds
  - Maintenance & Construction Projects
  - Safety & Security
  - Custodial Services
  - Mail/Supply Room
  - Other Facility Services
- Procurement/Other Services
  - Office Moves/Space Planning
  - Real, Personal, Surplus Property
  - RFP/Contractual Services Coordination
  - Purchasing & Vendor Management
  - Fixed Assets/Inventory
  - TSB Vehicles

Office of Employment & Training
Joan Modrell
Director

- Career Centers/Operations
- Wagner-Peyser
- Workforce Investment Act (WIA) State Administration
- WIA Service Provider Greater Nebraska Contract
- Board Support
  - Greater Nebraska WIB
  - Worker Training
  - State WIB
- Rapid Response/Trade Unit
- Veterans Programs
- Worker Training Program Administration
- Work Opportunity Tax Credit
- Alien Labor Certification
- WIA/Wagner-Peyser Federal & Local Reporting
- Federal Grants & Special Projects
- Grant & Resource Development

Office of Unemployment Insurance
Jim Kubovy
Evan Littrell
Administrators

- Tax
  - Employer Liability/ Account Maintenance
  - Tax Accounting
  - Collections
  - Field
- Benefits
  - Nebraska Claims Center
  - Wage Investigations
  - Payment Approved Training
  - Special Programs-TRADE; DUA
- Benefit Payment Control Unit (BPCU)
- Resource Justification Model (RJM)
- Internal Security
- Tax Performance System (TPS)
- State Quality Service Plan (SQSP)

Office of Safety
Chris Cantrell
Director

- Boiler
  - Inspections
  - Boiler Advisory Board
- Elevators
  - Inspections
  - Conveyance Advisory Board
- Amusement Rides
- OSHA Voluntary Consultation (21 d)
  - Consultations
  - SHARP

Office of Labor Market Information
Phil Baker
Research Administrator

- Bureau of Labor Statistics Programs
  - Current Employment Statistics
  - Local Area Unemployment Statistics
  - Occupation Employment Statistics
  - Mass Layoff Statistics
  - Quarterly Census of Employment & Wages
- Workforce Information
  - Career Compass
  - GIS
  - Graduate Outcomes in Nebraska
  - Industry Projections
  - Labor Market Regional Reviews
  - License and Certified Occupations
  - Longitudinal Employer-Household Dynamics
  - Nebraska Workforce Trends Newsmagazine
  - NSTARS
  - Occupational Projections
  - TrainingLink
  - Workforce Information Database
- Census Affiliate
- General LMI requests & research
- Unemployment Insurance Reports and Research
- Grant & Resource Development

Revised 12/2015

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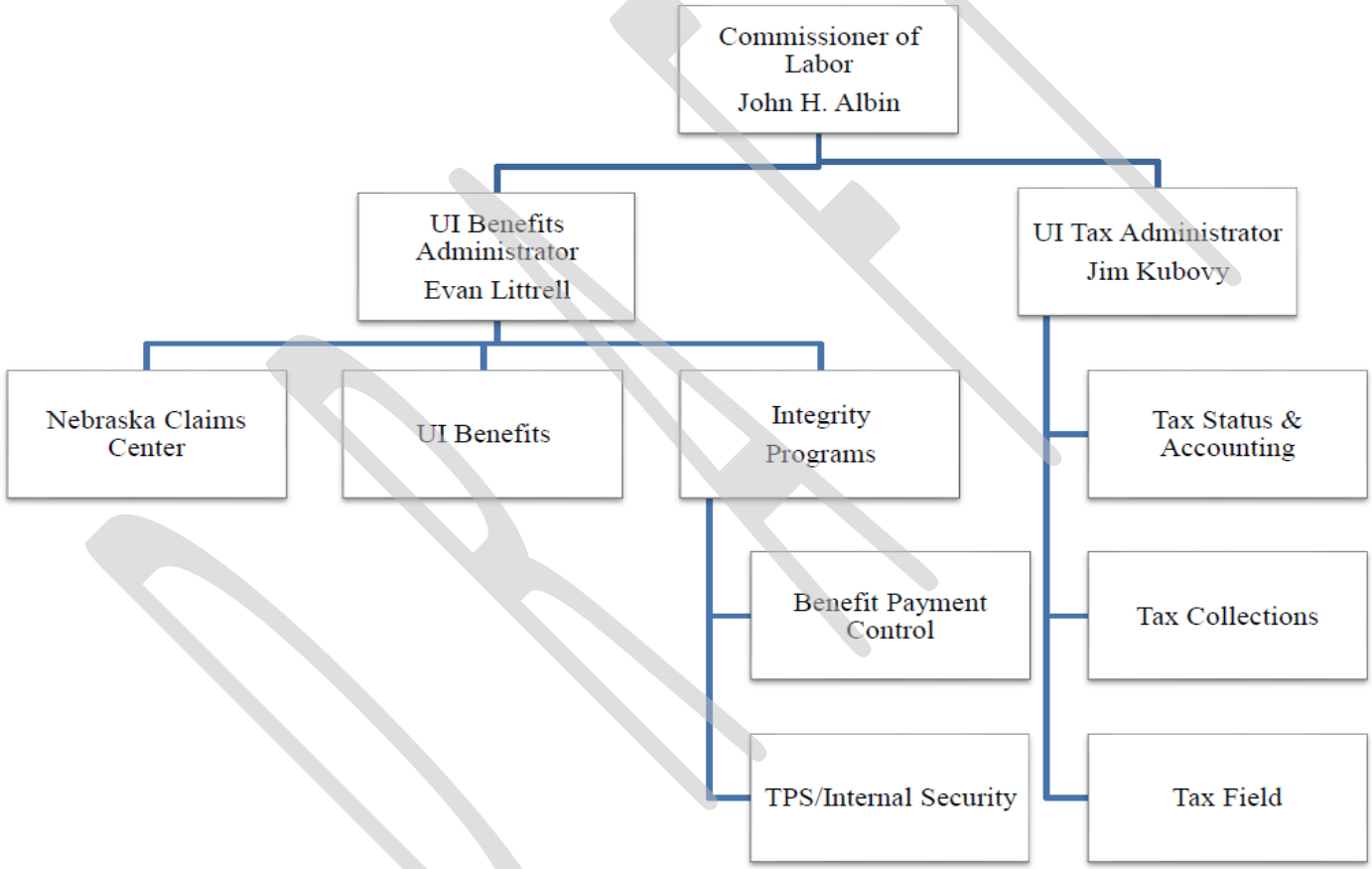
Nebraska Department of Labor
Unemployment Insurance
September 2015



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U.S. Department of Labor

SQSP SIGNATURE PAGE

OMB Approval No. 1205-0132 Expires 12/31/2017

U.S. DEPARTMENT OF LABOR Employment and Training Administration	**FEDERAL FISCAL YEAR** 2016	**STATE** NE

UNEMPLOYMENT INSURANCE
STATE QUALITY SERVICE PLAN
SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

NEBRASKA
(STATE'S NAME)

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE	SIGNATURE	DATE
STATE ADMINISTRATOR John H. Albin		9/4/2015
DOL APPROVING OFFICIAL		
DOL APPROVING OFFICIAL		

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Senior Community Employment Program Service

Economic Projections and Impact

The State Department of Labor data offers the state's top 10 occupations that have above average job prospects. Occupations addressing our aging population's long term care support needs are prominently featured.

Table: 2010 - 2022 Occupational Projections Top 10 Most Annual Openings for Postsecondary Non-degree Award Education Level with Entry Wages from the Occupational Employment Statistics Survey

SOC Code	Standard Occupation Classification (SOC) Title	Average Annual	Entry Wage
29-2061	Licensed Practical and Licensed Vocational Nurses	293	$16.37
31-1014	Nursing Assistants	459	$10.47
31-9092	Medical Assistants	147	$11.90
39-5012	Hairdressers, Hairstylists, and Cosmetologists	142	$8.32
47-2111	Electricians	155	$14.37
47-2152	Plumbers, Pipefitters, and Steamfitters	132	$15.93
51-4041	Machinists	144	$12.93
51-4121	Welders, Cutters, Solderers, and Brazers	153	$13.15
53-3032	Heavy and Tractor-Trailer Truck Drivers	920	$14.40
53-3033	Light Truck or Delivery Services Drivers	105	$9.45

Source: Nebraska Department of Labor, Office of Labor Market Information 2010 — 2022 Long Term Occupational Projections and the Occupational Employment Statistics Survey updated to third quarter 2015

The State Department of Labor notes that the most common job vacancies are for Production, Office and Administrative Support, Sales and Related, Transportation and Material Moving and Food Preparation and Serving Related occupations. Some of the most common job vacancies, such as office and administrative support, match the interest of some women over 55 years of age seeking employment. The Senior Community Service Employment Program's (SCSEP) host agencies provide the location and the skills training to support participants' development of job skills for meeting their goal of locating a position in the workforce. Office work and food service are the most common types of training opportunities offered through Nebraska's host agencies.

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Host agency training may need further supplementation by SCSEP the sub-grantee and the Workforce Innovation and Opportunity Act (WIOA) partners to provide local employers with job-ready employees. The office jobs currently available require a working knowledge of computers. This technological experience is often underdeveloped in persons over 55 years of age. Computer skill-building classes are offered to participants of the Senior Employment Program through a job-certified training developed by Omaha's Workforce Development Board (WDB).

Purpose of the State Senior Community Service Employment Program (SCSEP) Plan

Nebraska's Combined State Plan includes the Senior Community Service Employment Program (SCSEP) State Plan.

The SCSEP provides training for aging workers through community service organizations (host agencies). Common training locations are provided at schools, hospitals and senior service organizations. Nebraska's SCSEP program has a working relationship with a wide variety of community organizations. These include local non-profits, senior service organizations, senior centers and local Area Agencies on Aging. Additional partnerships have been formed with supporting employment training organizations such as One-Stops and the Workforce Development Boards and local employers. Once completed, a new partnership will also include Nebraska's Aging and Disabilities Resources Center.

Communication is vital for Nebraska's SCSEP. Program adjustments (due to revised regulations, processes, program performance measures or employment niches for older workers) may be required for substantial changes in program operations. These developments are discussed with Nebraska's project sponsors during regular contacts or as needs arise.

Under SCSEP, project sponsors receive grants to create and pay for part-time (usually 18 hours a week) community service positions for low-income persons over 55 years of age at local public or private nonprofit organizations. The program has a dual purpose to provide useful community service assignments for the enrollees while promoting transition to unsubsidized employment. Local public and private nonprofit organizations which provide training opportunities also benefit through the work completed by SCSEP enrollees.

Use of Funds

Each enrollee is offered a minimum of at least 18-hour work week. Enrollees placed in part-time community service employment currently receive a wage not less than what is established by the State Minimum Wage Law and receive fringe benefits. Host agencies, private nonprofit employers, and public employers provide skill training through subsidized part-time employment in the fields of social services, recreational activities, library services, legal services, health care, education, economic development, conservation, maintenance and

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restoration of natural resources, community beautification, and other services within communities. A host agency must be a governmental or nonprofit, nonpartisan organization. Examples of host agencies include schools, senior centers, food banks, housing authorities, libraries, community foundations and health agencies.

Participant Eligibility

Eligible individuals are at least 55 years of age, and have an income not greater than 125 percent of the poverty level, or are a member of a family that receives regular cash public benefit payments. Income eligibility must be certified annually. All participants must reside within Nebraska. There is no minimum period of residency for determining eligibility. Grantees may not impose additional eligibility requirements beyond those imposed by federal law. The enrollment priorities for filling vacant authorized positions are as follows:

1. Veterans and qualified spouses.
2. Individuals with the greatest economic need (incomes at or below the poverty level).
3. Those 65 years of age or older.
4. Those seeking re-enrollment following termination of a job through no fault of their own due to illness or engaging in unsubsidized employment, provided that re-enrollment is sought within one year of termination.
5. Individuals with limited English proficiency.
7. Anyone with a disability.
8. Those with low employment prospects.
9. Those at-risk of homelessness.
10. Individuals that live in rural areas.

Organizational Participation

The development of Nebraska's Senior Community Employment Program State Plan, as a chapter of the Combined State Plan, involved the insight and participation of a variety of interested persons and groups. This planning process involved multiple steps and opportunities for various opinions to impact the plan. A brief summary includes:

1. State Title V Agency developed the framework and initial draft of State Plan. State SCSEP coordinator attended focus group meetings held by the workforce development agency to gather input on the combined state plan.

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2. Nebraska's Title V program includes Experience Works which operates in 82 counties. Experience Works recruits, locates community service training and helps program participants locate unsubsidized jobs.
3. State Department of Labor and workforce development partners provide job-search and work-skills development. The Department of Labor collaborates with the Departments of Economic Development and Education to develop a strategic approach to developing a local workforce with the skills needed for current jobs as well as future opportunities. The Department of Labor provides a wide variety of support services for job seekers. Their workforce development activities include job-training for adults. Some SCSEP participants receive additional training through this program.
4. Workforce development partners are regional agencies which work with schools, employers and other training partners to provide necessary skills training for persons seeking employment. Nebraska's Senior Community Service Employment Program is an active partner in the WIOA's One Stop Centers/American Job Centers. Some SCSEP participants also benefit from training opportunities available through the WIOA's adult training programs.
5. Area Agencies on Aging provide a wide variety of support services to help persons over 60 years of age live independently within their communities. SCSEP participants often have significant constraints limiting their ability to find and keep a job. Addressing factors such as affordable housing, transportation and caregiver support are necessary also. Their familiarity with community supports makes Area Agencies on Aging important partners for Nebraska's Senior Community Service Employment Programs.
6. Community service organizations provide training to SCSEP participants. These organizations range from senior service organizations such as senior centers to community services including schools and hospitals.
7. Nebraska's Combined State Plan is posted on the Nebraska Department Health & Human Services web site www.dhhs.ne.gov/aging and published for comment by the Nebraska Department of Labor.

Public Comment Period

Nebraska's Senior Community Service Employment Program Plan for 2016-2020 was published for comment from January 18, 2016 to February 17, 2016. The Plan is placed on the State Unit on Aging's web-site www.dhhs.ne.gov/aging and e-mailed to the Nebraska Department of Labor, workforce development partners, Area Agencies on Aging, Senior Center Associations and community service, labor, and business organizations. All comments received will be shared with the workforce development agency, the core partners and others involved in developing the Combined State Plan. A Public Notice regarding availability of this plan and a request for comments was also published in the local newspapers.

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Distribution of SCSEP Positions

The Nebraska Equitable Distribution Report provides a basis for determining a fair allocation of program positions with the State. This report is useful for determining where to locate new positions, fill vacant positions, or reduce positions, as necessary. The most recent Nebraska Equitable Distribution Report prepared in 2014 is contained in Appendix A

The distribution of Nebraska's SCSEP positions has supported the rural counties. Until the last few years Douglas County, which includes Omaha, had substantially fewer positions than were equitable. During this period, Experience Works shifted a number of their positions into Douglas County. Future Equitable Distribution discussions will focus upon the adequacy of position distribution within the urban and rural counties. Nebraska is working with the U.S. Department of Labor to move some positions from urban centers to rural counties and counties serving Native American population.

Nebraska Demographics

According to the Nebraska Department of Labor, two-thirds of Nebraska's counties are not included in a Metropolitan Statistical Area (MSA) or a Metropolitan Statistical Area (MC). According to the U.S. Department of Agriculture, Economic Research Service, in 2012, there were 49,969 farms covering 92.2% of Nebraska. Yet, according to the Bureau of Economic Analysis, only 4.2% of Nebraskans were employed in the Agriculture industry in 2014.

Twenty-eight of Nebraska's 93 counties are either part of the Omaha, Lincoln, or Grand Island MSA, or are part of a MC. The greatest percentage of employing industries in Nebraska are Health Care and Social Assistance (14.3%), Retail Trade (11.4%), Manufacturing (10.2%), Educational Services (9.2%), Accommodation and Food Services (7.8%), and Finance and Insurance (5.7%). The top industries with the highest number of job openings are very similar, with Health Care and Social Assistance, Retail Trade, Administrative and Waste Services, and Manufacturing topping the list.
Sources: Nebraska Department of Labor, Labor Market Information, Quarterly Census of Employment and Wages. United States Department of Agriculture, Economic Research Service, State Fact Sheets: Nebraska.

Job Source: Nebraska Department of Labor Online advertised jobs data

According to the US Census, Nebraska's population of those 55 years of age or above represents 505,881 individuals or 26.9% of the state's population. According to the US Census, Nebraska's population of those 65 years of age or above represents 270,989 individuals or 14.4% of the state's population. The first of the baby boom generation reached 65 years of age in 2011. The population over 65 will increase dramatically over the next 15 years as baby boomers continue to age.

Special Populations

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The Older Americans Act requires this program provide priority in enrollment for eligible individuals who are veterans or spouses of veterans, those with greatest economic need, individuals who are minorities, and individuals with greatest social need, individuals who failed to find employment using available WIOA services, individuals who are homeless or at-risk of homelessness and those living in rural areas.

Greatest Economic Need

The term greatest economic need is defined as persons at or below the poverty level established by the US Department of Health & Human Services. Nebraska's population over fifty-five years of age includes 34,473 individuals with incomes below the poverty level, and 19,050 individuals over.

sixty-five years of age with incomes below the poverty level.

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.

Minorities

According to the U.S. Census, there were about 16,163 Native Americans living in Nebraska. Population totals for others races, according to the U.S. Census were: White: 1.64 million, Black: 86,423, Asian: 35,696, Native Hawaiian: 1,150, and Two or more Races: 41,316. There were 180,448 Hispanics or Latinos living in Nebraska. 33% of Whites living in Nebraska who were foreign born had become naturalized citizens. This compares with 33.2% of Blacks, 45.7% of Asians, and 26.8% of Hispanics. Hispanics were the largest category of foreign born population, at 66,077, and had the lowest rate of becoming naturalized US citizens.

For Nebraska's SCSEP, the term "minorities" includes American Indians or Alaskan Natives, Asians, Blacks or African-Americans, Hispanics or Latino Americans and Asians or Pacific Islanders. The majority of Nebraska's African-American population lives in Omaha and Lincoln. The distribution of Nebraska's Hispanic population is broader with a presence in many of the smaller cities such as Norfolk, Lexington and Scottsbluff.

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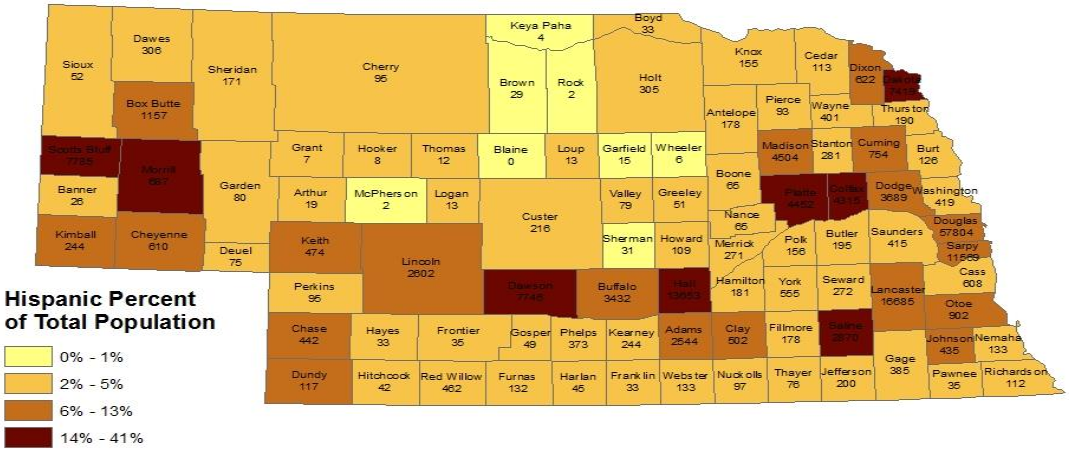
Nebraska Hispanic Population
Number of Hispanics and Hispanic Percent of Total Population



Source: U.S. Census Bureau
Prepared by Nebraska Department of Labor, December 2015

Greatest Social Need

The term greatest social need is defined as needs caused by non-economic factors such as physical and mental disabilities, language barriers and cultural, social, or geographic isolation, including isolation brought about by racial or ethnic status. For purposes of this plan, greatest social need is defined as persons with physical and mental disabilities who are 55 years of age or older. Nebraska's population over 55 years of age includes 128,754 persons with greatest social need.

Source: U.S. Census Bureau, 2014 American Community Survey 1-Year Estimates B21007

Rural & Urban Populations

According to population estimates from the Census from 2010-2014, much of the State's population growth has been in its urban counties. More remote counties have lost population. Sarpy County, part of the Omaha MSA, has grown rapidly in the last few years. The 2010 Census notes that 35% of the Nebraska population over 60 years of age lives in rural areas. While bio-technology, internet commerce and transportation services are growing rapidly in the eastern cities, most of Nebraska is rural with an economy that is heavily farming and ranch dominated.

Recruitment

Enrollment priority will be given to veterans and qualified spouses, eligible individuals having the greatest economic need and eligible individuals over 65 years of age. Nebraska's grantee has a history of focusing their efforts upon older individuals both with incomes below the poverty level and those with greatest social need. The State SCSEP program provides 54% of its positions to minority individuals. Over 95% of Nebraska's grantee's enrollees have annual incomes below the poverty level. Thirty-one percent of these enrollees are veterans. Among program participants, 81% are receiving public assistance and 64% are at risk of homelessness. Women over the age of 55 represent 42% of the total program enrollment.

Increasing Placements to Employment

Increasing the placement of trainees requires that a variety of support services be focused upon all SCSEP trainees as they approach job-ready status. This may be in the form of participation in job-clubs or specialized training through Workforce Development Board partners. Other approaches include trial employment or on-the-job training (OJE) with potential employers. Initiatives such as Omaha Chamber of Commerce-Workforce Development Board (WDB) job-certified training for Mutual of Omaha and Blue Cross/Blue Shield will be utilized as they become more available. Trial employment or on-the-job training opportunities will be for a limited time with the expectation of a high rate of hiring by participating employers. This strategy will support resume' development, interview skills and applying on-line for area jobs. Nebraska will utilize new strategies to reach employers and conduct job development such as distributing employer brochures, airing television and radio ads and using print media.

High growth industries in Nebraska include customer service representatives (for organizations such as Pay Pal, Sitel, Mutual of Omaha and Blue Cross/Blue Shield) and entry-level health care positions. These opportunities provide a livable wage for Nebraskans and a chance for advancement in growing organizations. Office support is another opportunity which matches the interest of many persons over the age of 55; however, all of these opportunities require a working knowledge of computers which is supported by training offered through the program.

Continued success in meeting performance goals will require maintenance and further development of partnerships within Workforce Development Board and business community. Omaha's job-certified training program will be increasingly more common throughout Nebraska. Similar efforts are necessary to fulfill the Nebraska SCSEP's goal of providing trained workers for the State's high growth industries.

Program participants who locate employment will continue to receive program support. This support will consist of regular follow-ups with former participants and their employers. The purpose of follow-ups is to address any issues and support these workers in their new jobs.

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Service Delivery and Coordination

Nebraska is a vast geographic area of 76,358 square miles which means that technology is critical in coordinating services among programs and in providing services to employers and job seekers. To enhance coordination and communication, SCSEP will partner in the plan to utilize a single case management and Management Information System. This technology is called NEworks. NEworks is a powerful online labor exchange system that integrates workforce services with job seeker and employer candidate recruitment.

Nebraska has a NEworks Mobile APP available for job seekers to view jobs located near them with the "Job Nearby" feature, search for jobs by company, job title, and location, save their favorite jobs, share jobs via email, Facebook, or Twitter and access Nebraska' most comprehensive resource for full-time and part-time jobs.

The SCSEP program will work with the workforce development partners in developing sector strategies that will focus on industries that are essential to the economic vitality of the state's regions and support the businesses and offer employment opportunities to Nebraskans 55 and over who are structurally unemployed with barriers to employment such as low income, homeless, and other disadvantaged populations.

SCSEP subgrantee(s) will continue to work with the Nebraska Department of Labor (NDOL) One-Stop delivery system to prepare participants for in-demand industries and occupations. Nebraska hosts a website, H3.ne.gov that utilizes "real time" job postings and job seeker information from NEworks, Nebraska's job search system, to list Todays' Hot Jobs that are updated weekly. The Nebraska Departments of Labor, Economic Development and Education collaborated on this initiative to provide educators, economic developers, students and their parents, community leaders and job seekers information on the states' high skill, high wage and high demand occupations. Today's Hot Jobs are defined as High Wage, High Demand and High Skill. High wage is determined when an occupation has wages at or above the median. High demand is determined by the number of annual openings, the net change in employment, and the growth rate for the specific occupation. High Skill is defined as occupations which require some form of training and education beyond high school. All three factors must be present to be an H3 Occupation.

The SCSSEP will coordinate with the area agencies on aging, senior centers and other community organizations on activities carried out under other titles of the Older Americans Act (OAA). Collaboration with these agencies will include recruitment of new participants, establishing host agency sites with the agencies and integrating the SCSEP with the agencies' other services under the Older Americans Act. This includes collaborating with the Aging and Disability Resource Center (ADRC) with a SCSEP presence on the ADRC website (www.nebraska.networkofcare.org), collaborating with transportation services provided by the agencies for SCSEP participants that need supportive services and working with agencies that serve minorities including Native Americans under Title VI of the OAA.

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SCSEP will coordinate with labor market and job training initiatives in the state to promote access and distribute essential information to individuals 55 and over facing barriers to employment. For those wishing to investigate training options and approved training providers, NDOL's website at http://www.dol.nebraska.gov/, Quick Links provide Training Link, a self-service web-based tool that displays Workforce Innovation and Opportunity Act approved programs. Through Training Link, users are able to access the statewide list of eligible training providers and their performance information through NDOL's Training Link located at http://traininglink.dol.state.ne.us/.

In the rural areas of Nebraska, community service training opportunities are limited to local schools and government agencies. Larger towns offer broader training options which include health care and a wider range of community service organizations. Lincoln and Omaha have the widest range of community service possibilities including government offices (state, federal and local governments), hospitals (local, regional and university), to cultural centers, ethnic, minority and neighborhood organizations.

A wide variety of community service organizations provide training for program participants and have the benefits of a part-time worker. Community service needs addressed through SCSEP includes educational activities, environmental quality, health care, housing, employment assistance, cultural and recreational services, as well as senior services such as nutrition sites, outreach and referral, and transportation.

The State, along with its sub-grantee(s) will continue to discuss community service needs with the organizations addressing those needs. The opportunities created by a growing need in the health services area appears promising across the State. SCSEP participants will find opportunities as in-home or health facility care providers. These opportunities will require specialized skills development through classroom training offered by community colleges (with some preparation through on-line course work for persons living in remote areas) or on-the-job training for potential hospital maintenance workers or certified nurse assistants.

As a mandatory one-stop partner, the SCSEP grantee will continue to participate in the state and local Workforce Development Boards to work on program alignment, system building and service deliver design/coordination. Many of the sub-grantee's offices are co-located with American Job Centers or collaborate with them. This helps strategically serve the needs of SCSEP participants in finding unsubsidized employment. SCSEP participants will have access to online resources at the American Job Centers.

Coordination with Other Programs

To meet the basic support needs outside of training for employment, provide training to match older worker's employment goals, and matching older worker's to jobs available

with local employers will require coordination with a number of organizations. These organizations include human service, employment and training agencies and employers.

The inadequacy of basic supports such as housing, transportation and possible care needs of a frail spouse or parent will lower a SCSEP participant's chances of completing training, finding and keeping a job. Human service organizations such Nebraska's Aging & Disability Resource Centers, the Nebraska Department of Health and Human Services and Area Agencies on Aging will be central to addressing these basic support needs.

The Department of Health and Human Services (DHHS) offers a wide variety of supports to help maintain individuals within their community. Specific programs which address common support needs include the Social Services Block Grant, Disabled Persons and Family Support, Lifespan Respite and Medicaid Waivers. A sampling of possible support services includes: transportation, energy assistance, telephone assistance, Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps), adult day care for caregivers and covering the Medicare premiums for eligible low-income beneficiaries. DHHS also coordinates the Ticket to Work program which encourages persons receiving Social Security Disability to rejoin the workforce. Ticket to Work also provides benefits counselors to help people understand whether participation impacts eligibility for other public benefits.

The local Area Agencies on Aging are familiar with the support needs of the elderly and are experienced in organizing community resources to address those needs. Nebraska currently has one program sub-grantee, Experience Works. Experience Works was selected through a Request for Proposal process in 2015. Experience Works is also a national grantee whose service area covers all of Nebraska. Experience Works relies upon the staff of each of the eight Area Agencies on Aging to address non-employment support needs of SCSEP trainees.

The program is also participating in the development of the Nebraska's Aging and Disability Resource Centers (ADRC). This partnership will be able to provide information to address a variety of human services as well as a referral to local agencies which provide assistance to our targeted population. The ADRC website provides linkages to a wide variety of community resources for the SCSEP participants. Coordination with ADRC will be enhanced after the selection of pilot organization(s) in the state in early 2016.

One significant barrier to employment is an inadequate availability of public transit. The State Unit on Aging has established a Senior Transportation Coalition with the substantial support from Nebraska Easter Seals and Nebraska AARP. Nebraska's efforts have focused upon the development of local coordinated transportation initiatives and regional coordinated transportation systems. Interest in this initiative has come from human service, transportation providers and State agencies (Departments of Health and Human Services, Labor, Roads and the Public Service Commission) and indicates a continuing commitment to improve the availability and effectiveness of public transportation services.

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Affordable housing is necessary to rebuild or maintain the economic life of program participants. Housing issues range from locating affordable housing to accessing community supports such as energy assistance and weatherization. Both Area Agencies on Aging and Community Action Programs are familiar with available affordable housing resources. Program participants are often caregivers for a parent, spouse or grandchild. Nebraska's Lifespan Respite Program, Care Management Program and the Older Americans Act's Caregiver Support Program assist these caregivers. The Area Agencies on Aging are partners with the Lifespan Respite Program. The Area Agencies on Aging also provide Care Management and operate Caregiver Support Programs.

This older worker initiative focuses by design on an economically at-risk population. As noted earlier, 95% of participants have incomes below the poverty level, 81% receive public assistance benefits and 64% are at-risk of homelessness. A functional partnership between SCSEP, local aging, housing and community service organizations is necessary to address multiple needs of the program's participants.

The State Unit on Aging has worked with Experience Works to maintain functional partnerships within the WIOA system. Nebraska's sub-grantee is active with the local One-Stop Centers. This includes participation on Workforce Development Boards (WDB) and their committees. The sub-grantee has current Memoranda of Understanding with the WDBs.

Nebraska subgrantee will build partnerships with local economic development offices in rural areas. This will be a critical strategy as Nebraska moves SCSEP positions from urban centers to rural areas. Local collaboration will be enhanced with the five economic development field offices as well as with the Latino Business Office in the Department of Economic Development.

Nebraska's long-term strategy to engage employers to develop and promote opportunities for placement of SCSEP participants in unsubsidized employment is discussed elsewhere in this plan. NEworks and Nebraska Career Connections sites contain resources specific to employers. SCSEP will continue to expand OJE opportunities with employers for the SCSEP participants.

Nebraska's long-term strategy for serving minority older individuals under SCSEP will include ongoing collaboration with agencies serving the minority population such as the Latino Centers and Migrant Seasonal Farmworkers and utilizing television and radio ads in Spanish and continued use of printed materials in Spanish. Moving some SCSEP positions from urban centers to counties with large Native American population is being considered.

The Partner Council will continue to work together to find skill gap solutions, resource solutions, work readiness solutions and other innovative workforce solutions. The Partner Council will receive timely and valuable information from the Industry Councils and local and

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regional employer representatives on work and skill readiness needs. Depending on labor market demands and skill sets needed, any one or all of the partners may participate in a work readiness initiative. The Partner Council will work collaboratively to address some of Nebraska's most challenging workforce issues identified by subpopulations. The State SCSEP Coordinator's participation on the Partner Council will help ensure that subpopulations and minority populations are being afforded good work opportunities and employers have a diverse and ready workforce.

Avoidance of Disruption in Service

Program adjustments may be necessary for a variety of reasons. Reasons vary from the population shift documented by a new Census to an adjustment in funds available to support this program. Modest program adjustments (such as yearly Equitable Distribution position level changes) will not have an impact on current individual enrollees. Actual program shifts would occur as participants leave the program for unsubsidized jobs or for other reasons. A decrease in program funding will also require similar action. A substantial cut in funding will require a more significant program adjustment such as a reduction in the weekly participant's training hours. All participants will continue to receive program support during a program adjustment period.

Improvement of SCSEP Services

Program improvement over the next four years will increasingly focus upon growing industries, developing a closer working relationship with human service organizations, supporting employers and equitably distributing SCSEP positions across our State. Suggestions include:

1. Increase SCSEP focus upon Nebraska's "Hot Jobs." Through partnerships with other Workforce Innovation and Opportunity Act organizations develop classroom and on-the job training to address our growth industries. Long term care will be a growth industry as the Baby Boom generation increasingly needs a variety of supportive services.

2. Develop a closer working relationship between SCSEP, Ticket to Work and the Centers for Independent Living.

3. Continue relationships between SCSEP, Nebraska's Aging Network (Aging and Disability Resource Center and Area Agencies on Aging) and the State Department of Health and Human Services to address the multiple support needs common among SCSEP participants.

4. Work with Medicaid to review program guidelines which count SCSEP training income when determining program eligibility. Current rules require interested older persons to choose between training and Medicaid.

5. Review the distribution of positions to be proportional to the eligible population of persons over 55 years of age, commuting patterns, industry concentrations and education

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systems (community colleges) in the newly designated economic regions in the state. Distribution within rural areas will be monitored to assure equitable distribution of SCSEP positions. Shifting positions will be accomplished gradually as participants leave this program.

6. Work with SCSEP providers to assure timely reporting of participant activity into SPARQ (US Department of Labor web-based reporting system).

SCSEP Operations

Administrative: The State Unit on Aging within the Nebraska Department of Health and Human Services, Division of Medicaid and Long-Term Care is responsible for the state Senior Community Service Employment Program (SCSEP). The SCSEP coordinator has the primary responsibility to oversee the program and spends 40% of her time administering and guiding the program. The SPARQ (SCSEP Performance and Results) system is reviewed on a monthly basis to ensure that data is being entered correctly and that there are no rejects. Periodic meetings, monitoring visits and conference calls with the sub-grantee and host agencies will be held to share new requirements and changes to the program and review program operation and service delivery. Monitoring the subgrantee will include both programmatic and fiscal monitoring. State SCSEP coordinator will conduct onsite monitoring at host agencies and interview participants and their supervisor. Data Validation is also one of the responsibilities of the program which is done on an annual basis. The SCSEP coordinator will work closely with the NDOL Office of Employment and Training during the WIOA implementation. Joint training for staff in One-stop Centers and Experience Works will be explored and coordinated with the NDOL, Office of Employment and Training using cost share between NDOL and SCSEP. The subgrantee will hold quarterly meetings with participants and host agencies' supervisors. Experience Works staff attend training provided by their corporate office and will also explore additional training on cultural competency.

The Nebraska SCSEP currently has one sub-grantee, Experience Works. Experience Works covers 82 counties. Experience Works was selected in 2015 after a RFP process. Nebraska has 68 authorized positions and 58 modified positions for PY 2015. If a new provider were to be selected to serve in the State in the future, we would comply with the requirements to transfer participants ensuring a smooth transition and limiting disruption to services and participants. The organizational chart of the State Unit on Aging is attached (Appendix B). A listing of Experience Works staff by location and number of slot is attached (Appendix C).

Recruitment: Grantee and subgrantee will utilize television, radio and print media to recruit program participants in addition to coordinating with community agencies and partners including the one-stop delivery system. Participants will be selected in compliance with priority of service guidelines as outlined earlier in this chapter.

Income Eligibility: Participant income will be certified for eligibility during initial enrollment and every year thereafter as long as the participant remains enrolled in the SCSEP. Eligibility

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records are maintained at the sub-grantee office in secured file cabinets with access limited to the SCSEP staff.

Orientation:

Participants: SCSEP Orientation is provided to all new enrollees within 10 days of enrollment and before they begin a community service assignment. Enrollees are compensated for their attendance. Program orientation includes review of the following:

1 Goals and objectives of the SCSEP
2 Durational limits
3 Causes for termination from SCSEP
4 Community service assignments
5 Available supportive services
6 Availability of free physical examinations
7 Participant's rights and responsibilities
8 Role of the Host Agency Supervisor
9 Training Opportunities
10 Reporting lack of training and supervision
11 Job search responsibilities
12 Time and Attendance
13 Wage and Fringe Benefits
14 Participant and Host Agency visitations
15 Annual recertification
16 Reporting changes to income and family size
17 Requirement to notify staff if employer
18 Obligation to seek unsubsidized employment
19 Customer service and satisfaction surveys
20 Assessments of enrollees' employment skills, knowledge and abilities
21 Individual Employment Plan and plans for transition to unsubsidized employment
22 Permitted and prohibited political activities
23 An overview of the authorities listed in this policy document
24 Termination/Exit, Complaint and Grievance policy and procedures
25 Sub-grantee's Drug and Alcohol Policy

Host Agencies: Orientation to the host agency is held during normal business hours and includes the following:

A. Community Service assignment location, description, schedule, and supervisor's name
B. Administrative procedures
C. Plans for transition to unsubsidized employment

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The orientation for host agencies is an opportunity to explain to employers the benefit of hosting a SCSEP participant for not only the individual, but for the organization that gains a part-time worker at no cost their organization. The organization has the added benefit of considering the participant for hire once they've had the opportunity to understand their skills, abilities and fit for the job.

Durational Limits: Eligible individuals may participate in SCSEP for a period not to exceed 48 months from date of enrollment. The 48-month participation time limit:

Includes any and all enrollments a participant may have had with one or more grantees.

Currently Nebraska does not provide durational waivers.

Assessments: Assessment and reassessment are essential for monitoring the progress of the participant and are completed in accordance with the participant's Individual Employment Plan (IEP). Prior to enrollment, the applicant is provided with an overview to the program and formally assessed to determine gaps in employment skills prior to being assigned to a community service training opportunity.

A Assessments is completed no less frequently than two times during a twelve-month period (including the initial assessment).
B. The host agency supervisor's input is included on all re-assessments.

Acceptable tools used include, but not limited to the following resources:

1 One-stop Career Center - NEworks (https://neworks.nebraska.gov)
2 O*Net (http://online.onetcenter.org/)
3 Web-based Assessment Tools

The assessment shall be in consultation with the applicant and must consider the following:

A. The individual's strengths and barriers to employment
B. The individual's preference of occupational category, work history, skill gaps, talents, aptitudes, physical capabilities
C. Need for supportive services
D. Required training needed to overcome barriers and the potential for performing community service training assignment duties
E. Potential for transitioning to unsubsidized employment
F. Sub-grantees are to assess and document information regarding most-in-need factors. The most-in-need measure reports the average number of barriers to employment per participant. The regulation allows credit for a total of 13 barriers to employment in two separate categories.

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All activity in relationship to assessments is recorded in detail in case notes and maintained in the participant's file.

Community Service Assignments: Training may be provided before or during a community service assignment. A viable community service assignment based on the participant's IEP must exist for any program services and training to occur. Individuals who have exited the program are not eligible for SCSEP funded training.

A. Community service training is provided through a host agency and offers the participant an opportunity to receive the needed skill training detailed in their assessments and IEP. Participant's skills needs are matched with the skills the community service training can provide. Community Service training is a participant-friendly approach to serving those who are most in need. Community service training is practical, working with real tasks, with actual equipment and dealing with current issues.

B. Nebraska has 58 modified slots where participants are placed for community service assignments.

C. Host agencies used include public agencies, government offices, hospitals, culture centers and ethnic/minority and neighborhood organizations. Host agencies are selected based on the skills training they can provide that best matches the skills needed by participants, the supervision they can provide while ensuring that the agencies understand the Maintenance of Efforts requirement. Community Service training is developed with the SCSEP staff, the participant and the host agency supervisor. Community Service Assignment Descriptions are not job descriptions. Each Community Service Assignment Description is tailored to each participant.

D. Currently, the number of hours participants work is 18 hours.

E. The subgrantee will provide fringe benefits such as Worker's Compensation.

F. The host agency agreement outlines the requirements for adequate supervision of participants and timely submission of timesheets to the subgrantee to ensure participants are paid wages on time. The subgrantee and the State grantee will conduct onsite monitoring of host agencies and interview the host agency supervisor and the participant to ensure adequate supervision is being provided.

Training:

General Training

A. General training is designed to enhance or refresh a participant's basic skills. It includes skills training, class room training, lectures, seminars and individual training.

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B. General training must be consistent with the participant's IEP and the costs are reasonable and made uniformly available to all participants.

C. General training may be combined with other training activities, such as community service, specialized training, on-the job experience, or other general training options.

Specialized Training

A. Specialized training is designed to prepare a participant for a particular job or industry.

B. The participant's assessment, IEP and assignment determine the training and skills needed to enhance the participant's opportunity to obtain unsubsidized employment.

C. After completion of the specialized training, the participant may be placed into job search or job club, directly into unsubsidized employment, back into a community service assignment or arrange for on-the-job experience if on-job-experience is offered through the state grant per Section 502 (e) of the Older Americans Act.

The SCSEP provides coordination with other training and placement programs through the Workforce Innovation and Opportunity Act (WIOA) One-Stop System. The WIOA creates a seamless service delivery system for individuals seeking workforce development services by linking the One-Stop partners in the One-Stop Delivery System.

A. The SCSEP is a required partner program under the Workforce Innovation and Opportunity Act. As such, it is a part of the One-Stop Delivery System. SCSEP grantees are required to follow all applicable rules under WIOA and its regulations.

B. SCSEP sub-grantees are to coordinate with the local One-Stop Delivery System to provide eligible and ineligible individuals with access to other activities and programs carried out by other One-Stop partners.

All participant training related activities are documented in case notes and maintained as part of the participant's permanent file.

Supportive Services: Sub-grantees are required to assess all participants' need for supportive services and to make every effort to assist participants in obtaining needed supportive services.

Sub-grantees may provide directly or arrange for supportive services that are necessary to enable a participant to successfully participate in SCSEP

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Support services are funded through the Other Participant Costs (OPC) funding category. To the extent practicable, the sub-grantee should arrange for the payment of these expenses from other resources.

The need for any supportive services is to be consistent with and documented in the participants IEP and in case notes with appropriate supporting documentation (formal assessments, etc.) including the justification, cost and source of the service and the length of time the service for which the service is authorized.

Sub-grantees are to ensure participants understand that supportive services are not an entitlement for the length of participation.

All supportive services are to be made available on an equitable basis to all participants within a sub-grantee's area of service.

Sub-grantees may use SCSEP funds to meet obligations under § 504 of the Rehabilitation Act of 1973 as amended, and the Americans with Disabilities Act of 1990 as amended and any other applicable federal disability nondiscrimination laws to provide physical and programmatic modifications accessibility and reasonable accommodation/modifications for and effective communication with individuals with disabilities.

Termination: Participants may be terminated from the program under circumstances described in the SCSEP Final Rule 20 CFR 641.580(a) - (e). Participants will not be terminated based on age; there is no upper age limit for participation in the SCSEP. In the case of serious violations, participants will receive progressive discipline and an opportunity for corrective action before a formal termination notice is issued. In all cases, participants will receive a 30-day termination letter notifying them of the date of exit, the reason for the termination, and the right to appeal under the sub-grantee's grievance procedure. A copy of the grievance procedure will be attached to the termination letter. Participants are given both a copy and a verbal explanation of the Involuntary Termination Policy during orientation.

Complaint and Grievances: Any Participant has the right to file a grievance. A copy of the Grievance Procedure is given to the Participant at Orientation. The grievance process is as follows.

- For a grievance involving the Host Agency, a SCSEP participant must first go through the established grievance procedure of the Host Agency training site.
- If the SCSEP participant is not satisfied with the decision and action offered by the Host Agency, the participant should contact the SCSEP sub-grantee where staff will attempt to work with the SCSEP participant and the Host Agency to broker a resolution to the grievance. This may include face to face meetings and discussions between all involved parties to resolve the grievance.
- If the SCSEP participant is still dissatisfied, the participant may take the grievance to the State Unit on Aging within the Department of Health and Human Services.

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Maximizing Enrollment: Subgrantee will over-enroll participants through ongoing recruitment efforts. Participants on waiting list will be enrolled based on their most-in-need criteria while balancing with the equitable distribution requirements. SPARQ will be monitored to gauge the service level of minorities, homeless, people with disabilities and other targeted populations. The services levels will be considered in enrolling participants to balance the equitable distribution requirements.

Performance: The performance indicators required by SCSEP include: Entered employment, employment retention, average earnings, service level, service to most-in-need and community services. The State grantee performance goals for PY 2015 are listed below. The State grantee will negotiate performance levels with USDOL in subsequent program years and in subsequent plan modifications.

PY 2015

Entered Employment	39.4%
Employment Retention	72.7%
Average Earnings	$7,123
Service Level	157.5%
Service to most-in-need	2.63%
Community Service	75%

Administrative Costs: The allowable 13.5% is used to cover administrative costs at the state and local service provider levels. Nebraska SCSEP has not requested an increase in administrative costs.

SCSEP Assurances

The state has established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the State and area agencies on aging; State and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) or AAA and 20 CFR641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.

Appendix A

2014 SCSEP Equitable Distribution Report

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The Equitable Distribution (ED) State Report form 8705A shows the number of authorized positons by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The state report should include all grantees that operate in a particular state. The tables in SCSEPED provide various calculations of the variance between the authorized position and the number of current enrollments by county. Please use the table from SCSEPED.org to fill out the values below and use those calculations to answer the two questions about the variance: What is its significance; and what, if any, actions the grantees will take to come into better compliance with the equitable distribution requirements. Submit the completed report to your FPO with a copy to grants.SCSEPdocs@dol.gov.

State:

I. Summary of Variance

	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	40	27.8
Over-service	4	40	128.6
Combined Total Under- and Over-service	8	80	35.3

II. Discussion: reasons for and significance of the variance

[Please describe any significant variance and explain the possible reasons for the variance]

Since July 2014 Nebraska currently has only one sub-grantee, Experience Works. Previous sub-grantee Eastern Nebraska Office on Aging (ENOA) did not enroll from April 2014 to June 2014. Experience Works did not get staff hired for Douglas County previously covered by ENOA until October 1, 2014.

III. Plan to improve statewide ED during program year

[Please explain your plans to reduce the variance in your state during the program year.]

State will make efforts to continually improve ED during the program year through sub-grantee advertisements in the media to recruit for positions in underserved counties. Moreover, as sub-grantee gets new employee trained in Douglas County, there should be no variance.

IV. Attach copy of state ED table from SCSEPED.org.

The Equitable Distribution (ED) Grantee Table 8705B shows the number of authorized positons by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The grantee report should include all states in which the grantee operates. The tables in SCSEPED.org provide various calculations of the variance between the authorized position and the number of current enrollments by county. Please use the tables from SCSEPED.org to fill out the values below and use those calculations to answer the two questions about the variance: What is its significance; and what, if any, actions the

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grantee will take to come into better compliance with the equitable distribution requirements. Submit the completed report to your FPO with a copy to grants.SCSEPdocs@dol.gov.

Grantee:

I. Summary of Variance

	Number of Counties	Percent of All Counties	Average Percentage of Variance
Under-service	4	40%	
Over-service	2	20%	
Combined Total Under- and Over-service			

II. Discussion: reasons for and significance of the variance

[Please describe any significant variance and explain the possible reasons for the variance]

Previous sub-grantee ENOA did not enroll from April 2014 to June 30, 2014. Current sub-grantee Experience Works did not get someone hired for Douglas County until October 1, 2014 therefore Douglas County is under-enrolled by 18 as of 10-31-14. EW staff is going through the waiting list now and should be fully enrolled by 12-31-14. State wide under enrolled is 12 out of 68 positions or 17.6% under enrolled

III. Plan to improve ED in your grant during program year

[Please explain your plans to reduce the variance in your grant during the program year.]

As sub-grantee gets new employee trained in Douglas County, there should be no variance.

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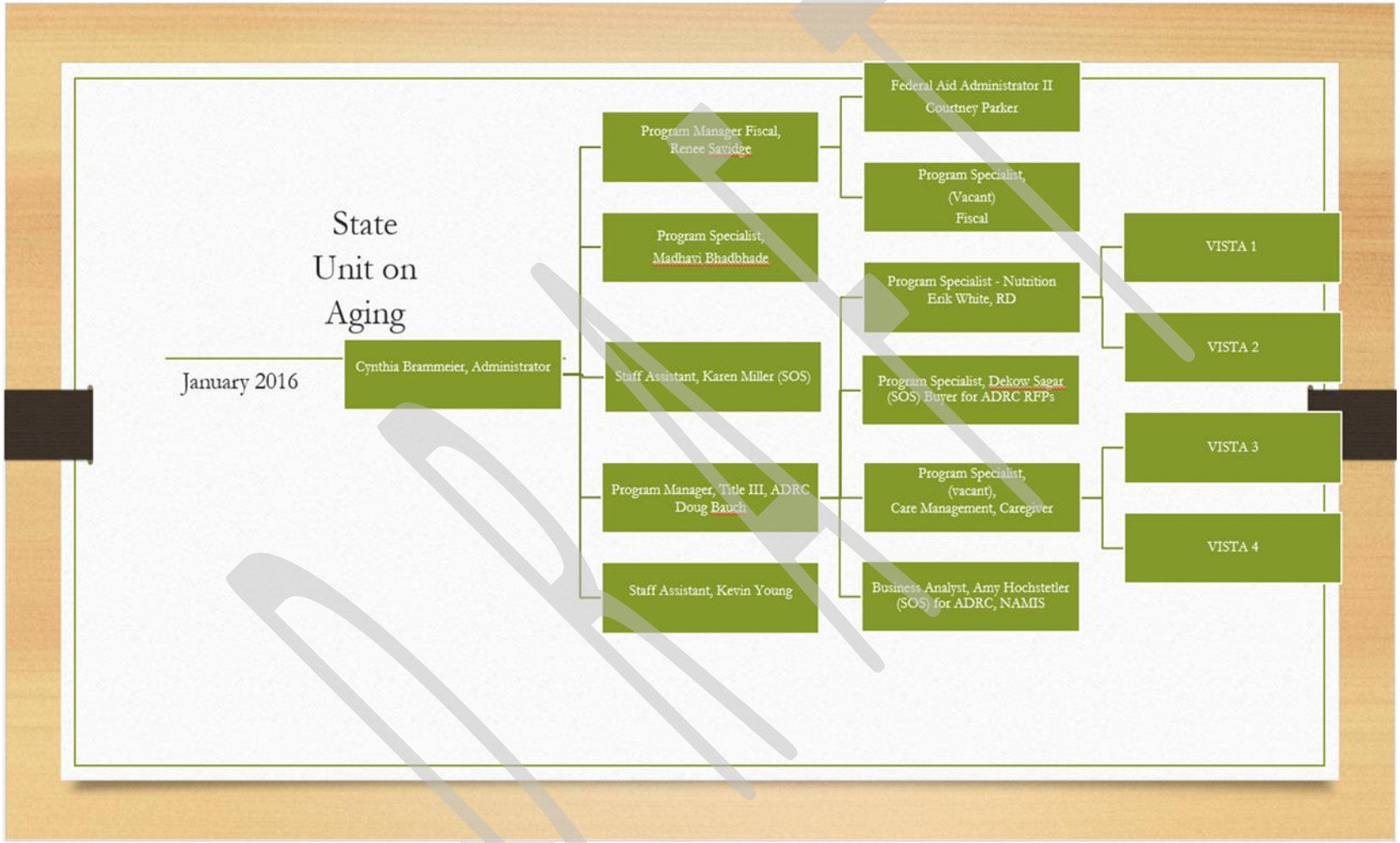
Appendix B



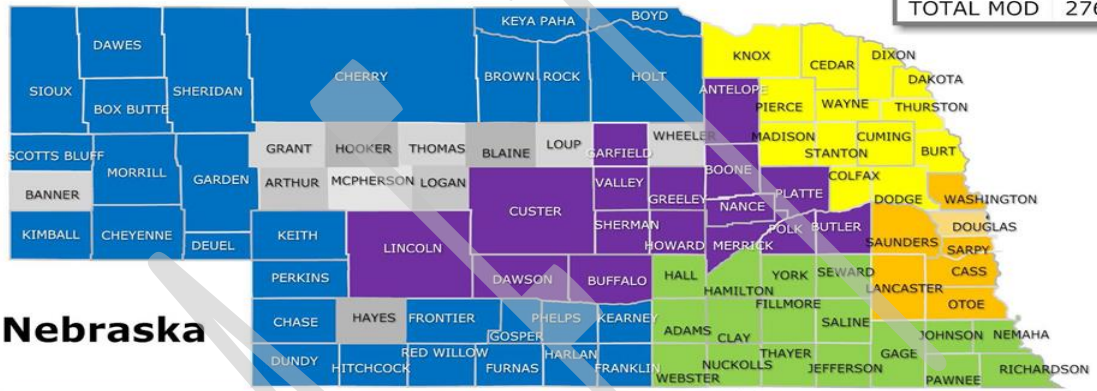
Appendix C

○ = State Office

● = ETC Office

Nebraska 2015 - 2016 Modified Positions

Federal	218
State	58
TOTAL MOD	276



Nebraska

Dana Gellerman (ETC-NE 01)
3350 N 10th Street
Gering, NE 69341
Phone: (308) 784-3844
Cell: (308) 641-2999

Box Butte	2	Holt	2/1
Boyd	1	Hitchcock	1
Brown	1	Kieth	1
Chase	1	Kearney	1
Cherry	1	Keya Paha	1
Cheyenne	1	Kimball	1
Dawes	1	Morrill	1
Deuel	1	Perkins	1
Dundy	1	Phelps	1
Franklin	1	Red Willow	2
Frontier	1	Rock	1
Furnas	1	Scottsbluff	8/1
Garden	1	Sheridan	1
Gosper	1	Sioux	1
Harlan	1	**Total**	**39/2**

Kristen Knobbe (ETC-NE 02)
435 North Monitor Street
West Point, NE 68788
Phone: (402) 371-0124
Cell: (402) 260-9439

Burt	3	Knox	2
Cedar	2	Madison	7
Colfax	1	Pierce	1
Cuming	2	Stanton	1
Dakota	3	Thurston	2
Dixon	1	Wayne	2
Dodge	8	**Total**	**35/41**
Douglas	0/41		

Ann Rouch, State Program Manager
306 E 6th St., North Platte, NE 69101
Ph: (308) 221-6967 C: (308) 530-9866
Toll: (877) 314-7526 Fax: (308) 535-8085

Melody DeJong, Office Administrator
2976 99th St, Urbandale, IA 50322
Ph: (515) 243-2430 C: (515) 321-3779
Toll: (877) 314-7385
Fax: (515) 598-7806

Roy Lawton (ETC-NE 03)
306 East 6th Street
North Platte, NE 69101
Phone: (308) 535-6628
Cell: (308) 672-6936

Antelope	1	Lincoln	7
Boone	2	Merrick	1
Buffalo	7	Nance	1
Butler	3	Platte	5
Custer	3	Polk	1
Dawson	5	Sherman	1/1
Garfield	1	Valley	2
Greeley	1	**Total**	**42/1**
Howard	1		

Jose Zapata (ETC-NE 06)
203 E Stolley Park Rd, Suite B
Grand Island, NE 68801
Phone: (308) 383-2670
Cell: (308) 385-8149

Adams	8	Nuckolls	1
Clay	1	Pawnee	1
Fillmore	2	Richardson	2
Gage	2/1	Saline	3
Hall	9/1	Seward	2
Hamilton	1	Thayer	1/1
Jefferson	2	Webster	2
Johnson	2	York	3
Nemaha	1/1	**Total**	**43/4**

Muriel Duckett (ETC-NE 05)
5752 Ames Avenue
Omaha, NE 68104
Phone: (402) 934-2846
Cell: (402) 216-6182

Cass	2	Sarpy	5/4
Douglas	20	Saunders	2
Lancaster	24/6	Washington	2
Otoe	4	**Total**	**59/10**

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Trade Adjustment Assistance Program

Individuals who have lost their jobs due to increased foreign imports or shifts in productions to foreign markets may be eligible for federally funded Trade Adjustment Assistance (TAA). Nebraska Department of Labor (NDOL) staff conduct informational meetings for the workers of the closing organizations and coordinate reemployment efforts and classroom training benefits. Additional benefits from the TAA may include job training, income support, job search and relocation allowances, a tax credit to help pay the costs of health insurance, and a wage supplement to certain reemployed trade-affected workers 50 years of age and older.

The TAA program is currently operating in Nebraska under four Federal Acts: Trade Act of 2002, Trade Adjustment Assistance under the Trade and Globalization Adjustment Assistance Act of 2009, Trade Adjustment Assistance Program under Trade Act of 2011, and Trade Adjustment Assistance Reauthorization Act of 2015.

Among the services provided under the Trade Act program include:

- Access to all Wagner-Peyser Services, including reemployment and job-readiness workshops
- Training services
- Coordinated services and referrals with partner agencies and programs
- One-on-one case management
- Job Search Allowances
- Relocation Allowances

(a) The TAA program is a required partner in the one-stop delivery system, established under section 121 of the Workforce Innovation and Opportunity Act (WIOA). Therefore, given that the TAA program is part of the broader workforce system and a key goal for the TAA program is to ensure that trade-affected workers are able to successfully return to work, ETA strongly encourages States to integrate their TAA program activities in concert with other workforce system core and partner programs that may also address the needs of trade-affected workers. WIOA Sec. 103(3)(A)(B). Consistent with the Governor-Secretary Agreement, the States agree to use funds obligated under the TAA Annual Cooperative Financial Agreement (CFA), to carry out the TAA program, including: 1) ensuring integration of the TAA program into its one-stop delivery system; 2) using the centers in this system or network as the main point of participant intake and delivery of TAA program benefits and services; and 3) ensuring the terms of the Memoranda of Understanding (MOU) with the Local Workforce Investment Boards, as established under WIOA section 121(c) will apply to the assistance provided by other one-stop partners to TAA participants. (Trade Act Sec. 239 (a) as amended by WIOA section 512 (hh))

Describe the State's process for operating the TAA program that ensures coordination and integration with WIOA core and partner programs. Provide examples, if available, of how the co-location of Wagner-Peyser in one-stop centers and the addition of Temporary Assistance for Needy Families (TANF), have improved access to these services for trade-affected workers.

Ensuring integration of the TAA program into its one-stop delivery system

As a required partner in the American Job Center system, all participants being served under these four Trade Acts currently have access to a broad range of partners and programs offered through the American Job Center system. Potential program participants can be connected to the TAA program at all offices within the American Job Center system via an integrated referral process or through an onsite case manager, where available. With the implementation of the Workforce Innovation and Opportunity Act (WIOA), Nebraska anticipates that these services will continue to broaden as providers from outside the four walls of the traditional career center are brought into the system.

Using the centers in this system or network as the main point of participant intake and delivery of TAA program benefits and services

Adversely affected workers are identified, entered into an electronic Management Information System (MIS), and provided with skill, aptitude, and interest assessments. NEworks is Nebraska's MIS system, and also functions as Nebraska's Labor Exchange under Wagner-Peyser. Utilizing assessments and participant input, program staff determine appropriate Trade benefit pathways for each individual. Wagner-Peyser or Workforce Innovation and Opportunity (WIOA) staff may provide initial services for adversely affected individuals prior to employer Trade certification, decreasing the amount of time the worker remains unemployed. While awaiting a determination on a TAA petition, individuals are encouraged to seek reemployment and training services from WIOA partners. Close coordination with the Dislocated Worker program allows these individuals the opportunity to access needed career services while awaiting a determination of their TAA petition. Continued coordination with the WIOA program after TAA eligibility is also strongly encouraged, and enhances the available career services and supportive services to the customer.

Once a participant is determined eligible for more than one program, the TAA case manager becomes the primary case manager. Conversations, communications and meetings are led by the TAA case manager, however coordination with staff from other programs may continue to take place for the benefit of the client. The participant coordinates and communicates primarily with their assigned TAA case manager, yet is being served across programs. This system ensures seamless service to the participant and enhance outcomes.

Trade Readjustment Assistance (TRA)

The Trade Readjustment Assistance (TRA) program is operated by the Office of Unemployment Insurance (UI) at NDOL. The TAA administrative staff work closely staff from UI to coordinate TAA and TRA benefits. NEworks establishes one record for each TAA participant. At the time a Trade waiver or Trade training is established, the client's detailed information is completed in NEworks. All elements for the file are required fields in NEworks to assure a complete reporting record is exchanged through an interface between NEworks and the Unemployment Benefit Payment System.

Regular communication between Trade and UI staff ensures appropriate TRA funding is available to those enrolled in full-time training. UI staff enters the Trade petition number

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correlating to the employer account number along with certification, impact and expiration dates, into the Unemployment Benefit Payment System.

Subsequent entitlement for TRA funding (Basic, Additional, Remedial, or Completion) is filed, established and/or modified by UI staff. This same interface captures daily payments that are uploaded from the BPS. Administrative staff can add or edit existing TRA payments based on EUC overlap issues. Data validation is completed for payment files to assure accurate build of TRA payment records, which is required for the quarterly TAPR/ Performance Reporting.

Policies, and Operations Manual

NDOL has developed an operations manual for staff and has implemented policies that cover individual Trade Acts. These policies are made available to the public at http://dol.nebraska.gov/EmploymentAndTraining/WIOA/Policies?sideMenu=JobSeekerResources. The operations manual is posted prominently on the NDOL's intranet site, and is available to all internal staff members.

Rapid Response and Early Intervention Policies

Nebraska has established operational policies to assure the Trade affected workers are being offered appropriate "Early Intervention Services." These services include Rapid Response assistance and career services under WIOA. Early intervention services that will be beneficial to potential Trade-affected workers may include, but are not limited to, orientation, surveying the workers, initial assessment of skill levels, aptitudes and abilities, the provision of labor market information, job search assistance, stress management, and financial management workshops. The staff providing these services may come from a variety of funding sources, particularly Wagner-Peyser or WIOA Title I. In most instances, the Rapid Response informational meeting(s) will be held in the city where the affected workers are or were employed. These meetings provide an outline of the TAA services potentially available.

If the Trade petition is certified by USDOL, the Trade administrative unit will send notifications to affected workers and schedule a trade orientation to disseminate information on Trade, WIOA, Wagner-Peyser and Unemployment Insurance. A Rapid Response event in a local area that covers employees displaced from a mass layoff, plant closing or other event that produced any number of unemployed individuals may turn into a Trade-covered layoff. Once the petition has been filed the Rapid Response staff work closely with the Trade staff to ensure all information is shared so that the Trade staff can immediately start triage efforts to contact all affected employees. The earlier the Trade staff can make contact with the employees, the better the chance the affected employees can begin receiving re-employment services.

TAA Informational Meetings

Following federal certification of a Trade Act petition, NDOL staff works with the State Trade Act Program Coordinator to ensure a TAA information meeting is provided for any affected workers. When possible, this meeting is held in conjunction with the Rapid Response meeting. During these meetings the worker will be instructed to go to the nearest American Job Center system location to complete an application for TAA benefits. Rapid Response staff will

coordinate reasonable accommodations for effected workers to assist in accessing TAA information.

Career Services to TAA Participants

Guidance from the Office of Employment and Training at the United States Department of Labor encourages multiple enrollment resources in order to produce successful outcomes for Trade-impacted workers. Providing timely career services to Trade-impacted workers will improve both the efficiency and effectiveness of the Trade Act programs. Nebraska's established Trade policies require staff to encourage potential dislocated workers to seek services from their local American Job Center as soon as possible, even if they are awaiting TAA certification decisions. At American Job Centers, career services are available and tracked in NEworks. These services include, but are not limited to, orientation, surveying the workers, initial assessment of skill levels, aptitudes and abilities, the provision of labor market information, job search assistance, stress management, and financial management workshops. Staff providing these services may work for various programs (particularly Wagner-Peyser or WIOA).

As part of TAA case management, staff will initiate an assessment of the worker's transferable skills, knowledge, and abilities and assist in researching both the labor markets within the commuting area and, if the worker is willing to relocate, other labor markets where relocation might be acceptable. Results from these assessments will help to determine if the required criteria for Trade training services are met. Immediately initiating the process of needs-assessment improves participation rates and allows individuals more time to consider the options available to them. Early intervention is particularly critical due to the time lapse that could occur while individuals await TAA petition determinations. Once Trade eligibility is established and individuals are notified of the TAA certification, partner staff continue to work together to ensure the services are delivered in order to avoid duplication, maximize funding, and improve the quality of service.

Federal Reporting

Nebraska has implemented an integrated case management and reporting System (NEworks) that allows for Trade participants to receive all employment and case management services that suit their individual needs. This system creates individual electronic files for Trade participants that provide the information necessary for all federal reporting requirements. As files are created for federal reports, applicable data is pulled from each program. Operating instructions for the federal Trade Activity Participant Report (TAPR) require that outcomes for training and receipt of certifications funded by WIOA be reported in the TAPR if the individual is co-enrolled. A data validation file is constructed daily in NEworks) in conjunction with the specification in the TAPR handbook. All elements for the file are required fields in NEworks to assure a complete reporting record. The data validation file is submitted each quarter via the United States Department of Labor for required federal reporting. The ability of NEworks to track and report on co-enrolled individuals improves participant outcomes while minimizing the funding of costly Management Information Systems for each program.

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Ensuring the terms of the Memoranda of Understanding (MOU) with the Local Workforce Investment Boards

The Nebraska Department of Labor (NDOL) is the entity that delivers TAA case management services. Memoranda of Understanding are in place with local areas allowing for the provision of job-seeking and career services to potentially eligible TAA participants to be provided. NDOL works very closely with each local area to ensure that proper referrals are being made and that participants are provided with additional career services at the location most convenient to that individual participant.

(b) States must develop and manage resources (including electronic case management systems) to integrate data, including co-enrollment data, provided through different agencies administering benefits and services to trade-affected workers in order to ensure consistent program administration and fiscal integrity, as well as reliable fiscal and performance reporting. (WIOA section 103(b)(3))

Describe how the State will use TAA funding for infrastructure, other shared costs, and the promotion of the development of integrated intake, case management and reporting systems.

Nebraska does not currently have a common intake among all core partner programs, but planning for such a system has been underway since shortly after the enactment of WIOA. Currently, information is shared between some partners through the integrated referral mechanism of NEworks. Trade shares NEworks as a common data tracking system with Wagner-Peyser, Jobs for Veterans State Grants, WIOA Title I Adult, Dislocated Worker, and Youth Programs, and two other discretionary grant programs. Partner staff can see the participant is being served by a partner program, and can take this into consideration when planning for potential co-enrollment opportunities. The Trade program in Nebraska is committed to working with other programs and providing resources to help develop a common intake system across more programs that meets the needs of Nebraska's job seekers and employers.

(c) Except for States covered by the regulatory exemption 20 CFR 618.890 (c) or to perform noninherently governmental functions, States must engage only State government personnel to perform TAA-funded functions undertaken to carry out the TAA program, and must apply to such personnel the standards for a merit system of personnel administration applicable to personnel covered under 5 CFR part 900, subpart F. (20 CFR 618.890)

In compliance with Title 20, CFR 618, the State of Nebraska houses merit staff in offices strategically located across the state to offer TAA case management. Merit staff is positioned in locations where TAA certification and service provision activity indicates the greatest need. These position assignments are reviewed on a regular basis. Where TAA merit staff is not present, Trade coordinates closely with existing WIOA or Wagner-Peyser staff to provide TAA case management to assist the customer in preparing for and obtaining suitable reemployment as quickly as possible.

Trade Adjustment Assistance (TAA) Program Assurances

The State Plan must include assurances that:	
1.	On an annual basis, the CSA will execute TAA Cooperative Financial Agreements and UI Funding Agreements for each fiscal year during the four-year State planning cycle.

Career and Technical Education

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 are operated by the Nebraska Career Education (NCE) of the Nebraska Department of Education. NCE has played an active role in planning, coordinating, and collaborative with the plan partners in the development of the Combined State Plan. NCE plans on participating fully in the state plan in the future, however the current timeline for submission of the state plan does not align with NCE's existing state plan.

Temporary Assistance for Needy Families

PURPOSE
Section 402 of the Social Security Act as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Public Law 104-193, requires that a State plan be submitted to the Secretary of Health and Human Services. Nebraska is submitting this State plan to renew its status as an eligible state in order to continue to qualify to receive funding and administer the Temporary Assistance for Needy Families (TANF) program.

ADMINISTRATION
The Nebraska Department of Health and Human Services (DHHS) has responsibility for administering the TANF program.

GOALS
Employment First is the name of Nebraska's welfare reform program. The primary purpose of *Employment First* is to provide temporary, transitional support for Nebraska families so that economic self-sufficiency is attained in as expeditious a manner as possible through the provision of training, education, and employment preparation. Nebraska is dedicated to improving the standard of living and quality of life for each family living in the State that has had to turn to public assistance to help support their family in times of need. We will accomplish this by promoting personal responsibility and empowering parents to support their families.

POPULATION SERVED
Nebraska will continue to serve families who are Nebraska residents and:

- Are composed of either one or two parents; or
- Specified relatives, conservator, or guardian; and
- Who are expecting their first child to be born within the next 90 days; or

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- Who care for children under the age of 18; or
- Up to age 19 if still in secondary school or participating in *Employment First* after dropping out of school; and
- Whose family's income and resources meet the current means test.

Nebraska will continue to serve families moving to Nebraska under the same program regulations as are applied to other Nebraska families.

Nebraska will continue to serve qualified aliens as defined in section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as amended, under the same program regulations as are applied to other Nebraska families.

OUT OF WEDLOCK BIRTHS

Nebraska 2010 Health Goals and Objectives

Refer to Attachment A for the MidCourse Review of Nebraska 2010 Health Goals and Objectives for Family Planning.

Nebraska Reproductive Health

Nebraska Reproductive Health is a Federal Grantee administering the statewide Title X Family Planning Program. Title X delegate clinics provide reproductive health education and comprehensive medical services that are an integral part of prevention and good health.

Nebraska Reproductive Health:

- Promotes responsible behavior, the well-being of families and healthy babies.
- Reduces mother and infant death, unintended pregnancies, child abuse and sexually transmitted diseases.
- Allows timing of pregnancies when couples are in the best position to care for new children.

Eleven delegate clinics provide services to people, both female and male, regardless of income, marital status, age, national origin, or residence.

Services at delegate sites are confidential and provided in a setting that preserves and protects the privacy and rights of each person.

Medical services include:

- Physical exams
- Cervical cancer screening
- Breast cancer screening
- STD testing and treatment
- High blood pressure screening

Education services include:

- Reproductive and preventative health
- Self-breast and testicular exams
- Contraceptive methods

- Anemia screening
- Pregnancy testing
- Contraceptive methods
- Referrals and links to community resources
- STD/HIV risks
- Infertility information

Abstinence Education
As a result of the Patient Protection and Affordable Care Act of 2010, P.L. 111-148, Nebraska is receiving federal funds to provide a state Abstinence Education Program for youth through community-based projects statewide as defined by Section 510(b)(2) of the Social Security Act. A state plan for implementing the program was approved December 20, 2010 by HHS, Administration for Children and Families, Family and Youth Services Bureau. The state plan can be found on the DHHS website at:
http://dhhs.ne.gov/publichealth/Pages/lifespanhealth_adolescenthealth_abstinenceeducationprogram.aspx

Positive Alternatives
A pilot program that began as a grant in 2005 has continued with service contracts executed for two-year periods. The current contractor, in place as of May 1, 2010, is Nebraska Children's Home Society. Their program, Positive Alternatives, provides a statewide network of prevention and direct services. The program is funded using Federal TANF funds and is administered by DHHS, Division of Public Health, Lifespan Health Services Unit. The services provided by the program meet the third and fourth statutory purposes of TANF as specified at §260.20(c) and (d) of this chapter.

Positive Alternatives provides information on assistance that is available statewide for those who are pregnant, or who believe they are and are not sure what to do. Positive Alternatives can help men whose girlfriends or wives are pregnant to understand what to expect next and how to be of help with the birth and raising of their child. The program works with many organizations across the state to provide education and services such as: professional counseling, abstinence education, natural family planning, birth control risk education, pregnancy tests and counseling, mentoring, childbirth education, ultrasounds, prenatal care (up through birth), STD testing and education, adoption information and education, support groups, parenting education and services, newborn care education, and fathers' program.

State Rape Education Program
The Nebraska Law Enforcement Training Center, the Nebraska State Patrol, and the Omaha Police Department are the three entities responsible for providing training to Nebraska's law enforcement officials on the problem of statutory rape. In addition, DHHS contracts with the Nebraska Domestic Violence Sexual Assault Coalition to provide training and technical assistance to local rape crisis centers as well as local police departments upon request regarding statutory rape.

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Nebraska Revised Statutes 28-317 to 321, Crimes and Punishments, does not distinguish between genders. The State Rape Education Program serves all genders equally without distinction. The educational services provided are the same for both genders statewide.

CONFIDENTIALITY

All information regarding individuals and families will remain confidential and available only for the purposes of the effective administration of the program and to other federal or state agencies as appropriate. All employees are trained in the need to maintain the confidentiality of information. All DHHS staff must complete HIPAA and SSA confidentiality training and all contractors must agree to and sign HIPAA Business Associates Agreements and SSA Access Agreements.

Access to DHHS' computer system N-FOCUS is defined by a security role that is attached to a person's ID, and access to information is defined and limited by job responsibilities. A personal logon ID cannot be issued until the individual completes a state developed orientation course. The orientation includes a review of data privacy and ethics as they pertain to client information.

All DHHS staff, contractors, temporary workers, and business partners are aware of the Information Technology (IT) Policies, Procedures, and Safeguards implemented by DHHS and understand their roles and responsibilities in insuring DHHS IT resources are secure and protected.

There are two sections to the Security Awareness Training. The first section "Information Technology Computer User Security Awareness" must be completed by any individual who uses a DHSS computer. The second section "IRS Federal Tax Information Appropriate Use and Disclosure" must be completed by every DHHS staff person that accesses IRS Federal Tax Information in the N-FOCUS data system.

TWO-PARENT FAMILIES

Nebraska's TANF cash assistance program encourages the formation and maintenance of two-parent families by the elimination of specific requirements, such as the 100-hour rule and qualifying work history, which restricted eligibility of the second parent in the home. In addition, stepparents are included as eligible members of the assistance unit, just as natural and adoptive parents are included in the unit.

ELIGIBILITY FOR TANF

Nebraska's TANF cash assistance program is called Aid to Dependent Children (ADC). Eligibility is limited to needy families with dependent children or parent(s) with an unborn child in the final trimester. A needy family is defined as a family consisting of children who are living in the home of a relative, guardian, or conservator, unless removed from that home by judicial determination and whose income and resources are below the standards which are applied on a statewide basis.

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Usually the child shares the same household with the parent, relative, guardian or conservator. However, a home is considered to exist as long as the parent or relative exercise responsibility for the care and control of the child, even though circumstances may require the temporary absence of either from the customary family setting. Allowable absences include:

1. A child receiving medical care or education which requires the child to live away from the home.
2. A child out of the home for a visit not to exceed three months.
3. Emergency situations that deprive the child of a parent, relative, guardian, or conservator's care (may not continue beyond three months except in case of extended hospitalization).

If the child is living with a relative, the relative must be a father, mother, grandfather, grandmother, brother, sister, stepfather, stepmother, stepbrother, stepsister, uncle, aunt, first cousin, second cousin, nephew, or niece. These relatives may be half blood, related by adoption, or from a preceding generation. A child may also live with the spouse of any persons previously named even after death or divorce has terminated the marriage. The child may also live with a court appointed guardian or conservator.

The needs of the parent(s), needy caretaker relative, guardian or conservator may be included in the ADC financial payment. To be eligible they shall:

1. Assign support rights to DHHS;
2. Cooperate with the Child Support Enforcement Unit;
3. Live with the child in a place of residence they maintain;
4. Be in need, as determined by assistance requirements and standards;
5. Cooperate in developing and completing a Self-Sufficiency Contract;
6. Not be eligible for the Aid to the Aged, Blind and Disabled (AABD) medical assistance program.

If there is more than one child in the household of a non-relative, all children for whom assistance is requested must be included in a single grant unit and budgeted accordingly. Deprivation of parental support or care is not an eligibility requirement. Unmarried parents living together as a family shall be considered a family unit when paternity for the child(ren) has been acknowledged or established. When unmarried parents are living as a family and one parent is ineligible, the ineligible parent and his/her child(ren) are not included in the ADC unit. If otherwise financially eligible, the other parent and his/her children may continue to receive ADC cash assistance.

Eligibility for ADC cash assistance must be redetermined every six months. A family will be eligible for financial assistance and services if:

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1. The family's countable income is under the standards in effect on July 1, 2013, adjusted biennially using the Consumer Price Index (CPI) for the previous two years; and
2. Countable resources do not exceed $4,000 for a single individual and $6,000 for two or more.

Any person convicted in federal or state court of having fraudulently misrepresented his/her residence in order to obtain assistance in two or more states is ineligible for ADC cash assistance for 10 years from the date of conviction.

An individual is ineligible for ADC cash assistance during any period in which the individual is:

1. Fleeing to avoid prosecution or custody or confinement after conviction for a crime or attempt to commit a crime that is a felony under the law of the place from which the individual is fleeing; or
2. Violating a condition of federal or state probation or parole.

An individual who commits any offense after August 22, 1996, which is classified as a felony and which has as an element the possession, use, or distribution of a controlled substance and is convicted under federal or state law after August 22, 1996, is permanently ineligible to be included in the ADC cash assistance unit.

As a condition of eligibility for ADC cash assistance, a client determined to be a work-eligible individual and subject to *Employment First* participation must complete his/her *Employment First* Self-Sufficiency Contract before the family can be determined eligible to receive ADC cash assistance. If a client does not cooperate in developing and completing an *Employment First* Self-Sufficiency Contract, the family is ineligible for ADC cash assistance.

BENEFITS

The maximum amount of ADC cash assistance provided will be $222 for the first person and $71 for each additional person included in the unit. The amount of the ADC cash payment to the household is determined by completing the following steps:

1. Total gross countable earned income;
2. Subtract 20 percent of earned income;
3. Subtract child care paid out-of-pocket;
4. Subtract the remaining earned income from the appropriate Standard of Need; ($529 for the first person and $123 for each additional person)
5. Compare the result of step 4 to the appropriate payment standard;
6. Show the lower of the payment standard or the difference from step 4;
7. Subtract unearned income from the amount shown in step 6;
8. The result of step 7 is the amount of the grant.

ADC cash assistance is time limited for families that include an adult or minor parent who meets the federal definition of a work-eligible individual.

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Families subject to the time limit may receive an ADC cash payment for which they are eligible for a total of 60 months in a lifetime. The 60-month lifetime limit begins with the first month the family is determined to be eligible for and receives ADC cash assistance.

Child care assistance is available at no cost to families receiving ADC cash assistance or whose gross earned and unearned income is at or below 100 percent of the Federal Poverty Level. Families whose incomes are above the current income standard for the full child care subsidy may be eligible for a partial child care subsidy if their gross earned and unearned income is at or below 125 percent of the Federal Poverty Level. Eligible families cannot be required to pay more than 20 percent of their gross income towards the cost of child care. Families must also show a need for receiving a child care subsidy, such as, but not limited to, job search, employment, education, training, incapacitated parent, and need to obtain medical care.

TRANSITIONAL BENEFITS

An ADC case may receive up to five transitional cash payments, each payment being equal to one fifth of the ADC Payment Standard for the family's size at the time the family becomes ineligible for an ADC cash payment if:

1. The unit lost eligibility for an ADC cash payment because of increased earnings or increased hours of employment of the parent or needy caretaker relative or guardian or conservator.
2. The unit meets the requirements to qualify for Transitional Medical Assistance.
3. The unit must have lost eligibility for an ADC cash payment in the month immediately preceding the first month of eligibility for the transitional cash payment.
4. In order to continue to receive transitional cash payments for the full five-month period, the family must meet the following requirements:
    a. The family's earned income cannot exceed 185 percent of the Federal Poverty Level for the family's size;
    b. The parent or needy caretaker relative or guardian or conservator must be employed;
    c. The family continues to reside in the State of Nebraska;
    d. The family must continue to include a dependent child; and
    e. The family must remain ineligible to receive an ADC cash payment.

Transitional cash payments will be funded with state dollars only. The state general funds used for transitional cash payments will apply towards Nebraska's Maintenance-of-Effort requirement. This additional cash benefit was created effective October 1, 2007.

Transitional child care assistance must be provided for up to 24 consecutive months if all of the following are met:

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1. The family loses eligibility for ADC cash assistance as a result of increased earnings or increased hours of employment;
2. The family received an ADC cash payment (or did not receive a payment but met income and resource eligibility to receive a payment) for which they were eligible in three of the last six months preceding ineligibility;
3. The family provides the financial information necessary to determine eligibility and the amount of the fee;
4. The child care is necessary to allow the parent to accept or retain employment;
5. The family's gross earned and unearned income is equal to or less that 185 percent of the Federal Poverty Level; and
6. The family continues to meet the resource limit.

APPEALS/MEDIATION

Every applicant for or recipient of assistance or services provided through DHHS has the right to appeal to the Director of DHHS for a fair hearing on any action or inaction with regard to the assistance or services. The request for a fair hearing must be filed in writing within 90 days following the date the notice of adverse action is mailed. If an applicant wishes to appeal due to inaction, s/he must request a fair hearing within 90 days of the date the application was signed. Requests for a fair hearing filed within ten days following the date the notice of adverse action is mailed will stay the adverse action until a fair hearing decision is rendered.

Employment First participants have the right to independent mediation if the participant is unhappy with a case manager's action or inaction; or when DHHS has determined that the participant has not complied with the terms of the Self-Sufficiency Contract; or the participant contends that DHHS has not fulfilled its terms of the Self-Sufficiency Contract. The request for mediation must be requested within 90 days following the date the notice of adverse action is mailed. Requests for mediation requested within ten days following the date the notice of adverse action is mailed will stay the adverse action until a decision is reached through mediation. If the individual is unhappy with a case manager's action or inaction, the individual has 30 days from the date of the case manager's action or inaction or the date the individual became aware of the case manager's action or inaction to request mediation.

EMPLOYMENT FIRST PARTICIPATION

Nebraska has adopted the federal definition of work-eligible individuals. All individuals who are defined as a work-eligible individual are required to participate in the *Employment First* program.

Once a family applies for ADC cash assistance, all work-eligible individuals, unless they otherwise qualify for an exemption from *Employment First*, are referred to the *Employment First* program at the time of the intake interview. The work-eligible individual is required to complete an *Employment First* Self-Sufficiency Contract within five days of the referral and immediately engage in approved work activities.

Dependent children age 15 or younger (including an emancipated minor) and dependent children age 16, 17, or 18 who are full-time students regularly attending an elementary or

secondary school or a dependent child age 16 or 17 who is a full-time student and regularly attending college, are not required to participate in the *Employment First* program.

ORIENTATION/ASSESSMENT/SELF-SUFFICIENCY CONTRACT

The orientation is done as an introduction to the E*mployment First* program and the comprehensive assets assessment. The orientation highlights the responsibilities that the client will be expected to fulfill if s/he becomes eligible for ADC cash assistance. The orientation also provides the participant with detailed information on all *Employment First* requirements, program expectations, participation options, services, and time limits.

An assessment will be completed with each participant. The purpose of the assessment is to gather and organize information about the participant's skills, aptitudes, strengths, interests, goals, prior work experience, family circumstances and employability. The assessment is an ongoing process. Reassessment occurs when a participant's circumstances change, when s/he is not able to continue forward movement in the activities included in his/her Self-Sufficiency Contract, or at any time the case manager and/or the participant determines it is necessary.

Based on the results of the assessment, an individualized Self-Sufficiency Contract, which incorporates a detailed Service Plan, will be developed. The Contract will stress urgent action toward economic independence. It will outline and define both DHHS' responsibility and the family's responsibility. The Contract will be used as a flexible tool. If the participant is not achieving progress in his/her Contract, it will be evaluated and changed accordingly.

WORK ACTIVITIES

Nebraska's approved work activities are:

1. Core activities:
    a. Unsubsidized Employment;
    b. Subsidized Private or Public Sector Employment;
    c. Work Experience;
    d. On-the-Job Training;
    e. Job Search/Job Readiness;
    f. Community Service;
    g. Vocational Training;
    h. Providing Child Care Services to an Individual Who is Participating in a Community Service Program; and
    i. Post-Secondary Education.

2. Non-Core activities:
    a. Job Skills Training Directly Related to Employment;
    b. Education Directly Related to Employment; and
    c. Satisfactory Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence.

SUPPORTIVE SERVICES

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Supportive services will be provided to the extent determined necessary to permit the individual to participate in any *Employment First* approved work activity, including the administrative process of orientation, assessment, self-sufficiency planning, and Self-Sufficiency Contract development, if no other source is available. Case management and necessary supportive services may be provided for the duration of the client's participation in all *Employment First* approved work activities and, if needed, after the loss of eligibility for ADC cash assistance due to earned income, and if the individual was either cooperating with or participating in *Employment First* at the time:

1. Extended *Employment First* supportive can be provided for up to three months for all approved work activities included in his/her Self-Sufficiency Contract; and
2. Transitional *Employment First* supportive services can be provided for up to six months if the supportive services are determined as necessary and critical for maintaining and/or retaining their employment.

The supportive services include, but are not limited to transportation, education/training related expenses, relocation assistance, work-related expenses, and medical-related services.

SANCTIONS

Non-cooperation with the program requirements will result in the following sanctions:

1. ADC cash assistance will be reduced by $50 for each dependent child who fails to attend school if the student's parent has not taken reasonable steps to encourage the child to remain in school.
2. Non-cooperation with Child Support Enforcement will result in a 25 percent reduction in the ADC cash payment and the removal of the sanctioned individual's needs from the medical unit.
3. Refusal to apply for potential income will result in the suspension or closure of the ADC case.
4. Failure of a needy caretaker relative, guardian, or conservator to participate in the *Employment First* program results in the removal of the individual's needs from the ADC unit. The sanction will last until the failure to participate ceases.
5. Failure of a dependent child age 16, 17, or 18 to attend school without participating in any other *Employment First* approved work activity results in removal of the child's needs from the ADC unit. The sanction will last until the failure to participate ceases.
6. If the parent(s) fails to participate in the *Employment First* program, the result is the loss of ADC cash assistance for the entire family. The length of this sanction is:
    a. The first sanction will last one month or until the failure to cooperate ceases, whichever is longer.
    b. The second sanction will last for three months or until the failure to cooperate ceases, whichever is longer.
    c. The third and subsequent sanctions will last for 12 months or until the failure to cooperate ceases, whichever is longer.

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DOMESTIC VIOLENCE

Nebraska has adopted the Family Violence Option under Subpart B of part 260 and wants Federal recognition of its good cause domestic violence waivers.

All *Employment First* case managers are trained on definitions, policy, introductory and screening questions, work requirement exemptions, process and flow, confidentiality and safety, understanding domestic violence and safety planning. All *Employment First* case managers are provided with a Domestic Violence Guide developed by DHHS, *Employment First* program, Voices for Children, and the Nebraska Domestic Violence Sexual Assault Coalition.

All work-eligible individuals are provided with a self-administered screening form which allows them to self-disclose domestic violence. The screening form is maintained in a safe and confidential file separate from the case file.

In order to qualify for an exemption from the work requirements and time limits, the individual must have an assessment for domestic violence by a domestic violence/sexual assault program representative or a medical professional. There must be verification of the domestic violence from appropriate professional sources. The case manager must refer the individual for counseling and appropriate services. Participation in approved work activities and the time limit may be waived for up to six months depending on the assessment. The exemption must be reassessed at least every six months or sooner and the exemption may be extended beyond six months, if necessary.

The *Employment First* case manager must develop an individualized service plan. The service plan outlines the steps necessary to overcome the individual's barriers to work and/or participation in other approved work activities. The service plan is based on a plan for treatment, therapy, counseling, or other activities recommended and/or determined necessary by a qualified professional in the appropriate discipline.

ELDER CARE

Nebraska assists *Employment First* participants to train for, seek, and maintain employment providing direct care in long-term care facilities, and in other occupations related to elder care determined appropriate by the State for which the State identifies an unmet need for service personnel.

To help communities address the growing need for personnel in the eldercare and healthcare fields, where possible, the *Employment First* program will partner with community organizations, schools and businesses in developing and funding community responsive customized training for certified nursing assistants (CNA) and certified medication aides (CMA). Nebraska promotes and funds CNA and CMA training, for which state and federal financial aid is not available. Job skills training and vocational training in eldercare and healthcare occupations are approved work activities under the *Employment First* program.

TANF EBT RESTRICTIONS

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P. L. 112-96 (Middle Class Tax Relief and Job Creation Act of 2012)
Nebraska has reached agreement with U. S. Bank, the vendor for our electronic benefit card to restrict access to automated teller machines or point-of-sale devices in casinos, gaming establishments, liquor stores, and retail establishments which provide adult-oriented entertainment. The restrictions will be placed based on vendor codes for these establishments and thus recipients of assistance will be able to access their benefits at any teller machine or point-of-sale device at other locations. Nebraska recipients of TANF assistance are not charged fees for use of their electronic benefit cards at any device.

SOLELY STATE-FUNDED PROGRAM FOR TWO-PARENT FAMILIES
Nebraska has implemented a solely-state funded program for two-parent families receiving ADC cash assistance. To allow for more flexibility in serving these families, this program is not funded with federal TANF funds. Cash assistance provided to these families will be funded with state dollars only. The state general funds used for cash assistance for this program will not count toward Nebraska's TANF maintenance-of-effort requirement and therefore are not subject to any federal TANF requirements. This program was created effective October 1, 2006.

The State provides short-term targeted services and work activities to these families to assist them in achieving economic independence. The regulations of the federal TANF program do not count many of these services and activities towards the work participation requirements. These services and work activities are necessary because this population comprises a small fraction of all Nebraska families on assistance, and two-parent families typically are:

- On ADC cash assistance for much shorter periods of time;
- Employed much sooner; and
- No longer eligible for ADC cash assistance if one person works more than 35 hours per week at minimum wage.

SOLELY STATE-FUNDED PROGRAM FOR SPECIFIED EXEMPTIONS
Nebraska has implemented a solely-state funded program for families receiving ADC cash assistance where the adult or minor parent qualifies for one of the specified exemptions. To allow for more flexibility in serving these families, this program is not funded with federal TANF funds. Cash assistance provided to these families will be funded with state dollars only. The state general funds used for cash assistance for this program will not count toward Nebraska's TANF maintenance-of-effort requirement and therefore are not subject to any federal TANF requirements. This program was created effective October 1, 2006.

This solely state-funded program allows Nebraska to exempt from the work participation requirements and federal time limits those families where the adult or minor parent is incapacitated with a medically determinable physical, mental or emotional impairment or who has significant barriers to participation in approved work activities. Nebraska will provide the services necessary to help these individuals overcome and/or remove the barriers preventing them from effectively engaging in approved work activities and attaining the maximum level of economic independence possible for their families through work.

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The following individuals are exempt from participating in *Employment First* and are exempt from the state and federal time limit for the length of time they qualify for the exemption:

1. A person who:
    a. Has an illness or injury serious enough to temporarily prevent entry into employment or participating in another *Employment First* component activity for up to three months;
    b. Is incapacitated with a medically determinable physical or mental impairment which, by itself or in conjunction with age, prevents the individual from engaging in employment or participating in another *Employment First* component activity and which is expected to exist for a continuous period of at least three months.
2. A person age 65 or older.
3. A parent who is needed in the home on a continuous basis to provide care for a disabled family member living in the home who does not attend school on a full-time basis and no other appropriate member of the household is available to provide the needed care.
4. A victim of domestic violence and where participation in *Employment First* approved work activities would make it more difficult for the individual to escape violence, or unfairly penalize the individual, or would put the individual at risk of further domestic violence.
5. A single custodial parent who is unable to participate because s/he cannot obtain child care for his/her child age five or younger for one or more of the following reasons:
    a. Unavailability of appropriate child care within a reasonable distance from the client's home or work site;
    b. Unavailability or unsuitability of informal child care by a relative or under other arrangements; or
    c. Unavailability of appropriate and affordable formal child care arrangements.

Two-parent families are allowed the same exemptions as are single-parent families, but will remain in the solely state-funded program for two-parent families. If both parents in a two-parent family qualify for an exemption, the family will be exempt from the state time limit for the length of time both parents qualify for an exemption.

SEPARATE STATE PROGRAM FOR SPECIFIED EXEMPTIONS

Nebraska has implemented a separate state program for single-parent families receiving ADC cash assistance where the adult or minor parent qualifies for one of the specified exemptions. ADC cash assistance provided to these families will be funded with state dollars only. The state general funds used to support this separate state program will apply towards Nebraska's Maintenance-of-Effort requirement. This program was created effective October 1, 2006.

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The following individuals are exempt from participating in *Employment First* and are exempt from the state and federal time limit for the length of time they qualify for the exemption:

1. A pregnant woman beginning the first of the month before the month of the mother's due date.
2. A parent or needy caretaker relative, guardian or conservator of a child under the age of 12 weeks. This exemption can be extended if a written statement from the attending physician states that the parent requires additional post-partum recovery time, or special medical conditions of the child require the presence of at least one parent or needy caretaker relative, guardian, or conservator.

Nebraska will continue to report on all TANF families and separate state funded families in the quarterly TANF data report (ACF-199) as required.

SEPARATE STATE PROGRAM FOR POST-SECONDARY EDUCATION

Nebraska has implemented a separate state program for single-parent families where the adult or minor parent is participating in an approved post-secondary education component activity. ADC cash assistance provided to these families will be funded with state dollars only. The state general funds used to support this separate state program will apply towards Nebraska's Maintenance-of-Effort requirement. This separate state program took effect November 1, 2004.

Nebraska's Section 1115 waivers allowed the State to count post-secondary education as an approved work activity. With the loss of the Section 1115 waivers, Nebraska's post-secondary education component activity became inconsistent with approved federal work activities. Post-secondary education is specified as an allowable activity under the Nebraska Welfare Reform Act. By creating this separate state program Nebraska will be able to continue post-secondary education as an allowable work activity.

Nebraska will continue to report on all TANF families and separate state funded families in the quarterly TANF data report (ACF-199) as required.

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SAFETY AND IN-HOME SERVICES

DHHS will use TANF funds to support an array services to assist needy families with children so that children can be cared for in their own homes by DHHS, Division of Children and Family Services (CFS) staff. The services provided meet the first statutory purpose of TANF (as specified at §260.20(c) and (d) of this chapter):

The eligibility criteria will be needs based as indicated by the family's program eligibility status for Aid to Dependent Children (ADC), Supplemental Nutrition Assistance Program (SNAP), SSI or Medicaid. Medicaid eligibility will be based on parent income and not state ward status of an identified child.

The target population is identified through the assessment of maltreatment reports of abuse or neglect by CFS staff. The target population is families whose child or children (ages 0 through 18) are involved in a proceeding in the juvenile court system and placed in the custody of DHHS (court involved) or whose families are in need of support services to safely care for their children in their own home (non-court involved).

Nebraska uses Structured Decision Making (SDM) for the assessment of reports of maltreatment. SDM is a set of evidence based assessment tools utilized to provide structure for gathering information at critical case management decision points. SDM increases the consistency and validity of decisions related to child safety, targeting resources to families at high risk of future maltreatment, supporting decisions for using out-of-home care and determining case closure. SDM also can be used to aggregate assessment and decision data to inform agency monitoring, planning and budgeting. The goals of the model are to reduce subsequent harm to children including re-referral, repeat maltreatment (in-home and out-of-home), and to reduce the time to permanency for children served by the DCFS.

The array of services includes:

1. <u>In-Home Safety Service</u> is a rapid response, home-based intervention service delivered by trained professionals to manage identified safety threats in order to safely maintain the child in the family home. Trained professionals shall intervene if safety of the child(ren) is compromised. Trained professionals shall provide training, modeling, and coaching to the parent or caretaker when necessary to facilitate the child remaining safely placed in the family home.
2. <u>Intensive Family Preservation (IFP) Service</u> is defined as intensive crisis intervention, therapeutic intervention and life skills education for the target population identified below provided in the home or at a location identified in the service referral. This service is designed to strengthen the family system, improve family functioning, increase access to community resources, assist in accessing informal and formal supports to preserve the family unit. This service is designed to create sustainable change in the family unit by focusing on interventions that build on family strengths in order to eliminate safety threats and/or reduce the risk of child maltreatment. This service must be delivered in the family home or their community, available 24 hours a day, 7 days a week, including holidays and weekends. This

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service must include multiple face-to-face direct contacts and indirect contacts (e.g. telephone calls, e-mail) with the family each week.

3. Family Support Service is defined as the provision of face to face assistance, coaching, teaching, role modeling, and the supervision of visits when applicable by a trained professional in the family home or community based setting. Family Support Service promotes family well-being and enhances the protective factors i.e., knowledge of parenting and child development, resilience, social connections, concrete supports, and social and emotional competence.
4. Agency Supported Respite Care is defined as the temporary care and supervision of youth referred by DHHS that is provided in a licensed foster home during an urgent or pre-planned situation. The Contractor shall communicate all known information about the child to the respite care family. The Contractor will also provide input to planning processes i.e. Family Team Meetings, Independent Living Plans and preparation of Case Plans and Court Reports when requested by DHHS. The Contractor will provide any information requested by DHHS necessary to complete reports required by any applicable Federal or State law and regulation. The Contractor shall be in compliance with all DHHS policy and regulation, to include regulation and licensure established by the Division of Public Health. The Contractor shall be responsible for transporting children in respite care to their home school, activities, and services that are located within a 25-mile radius from the foster care home. Activities and services are expected to include visits with the child's family members, behavioral health appointments, medical appointments, and extra-curricular activities
5. Drug Testing and Lab Confirmation Service is defined as a point of collection test by a trained employee in which specimens such as urine, saliva, and breath are used to determine a positive or negative drug test result. Collection of a urine specimen will be conducted through line of sight observation of the client by a trained employee of the same gender. Drug testing includes the collection of a sweat specimen obtained through the use of a patch. A refusal by the client is defined as the client choosing not to provide a specimen to the Contractor at a designated time and place. All refusals must be reported to the DHHS case manager or supervisor by the end of the next business day, unless otherwise noted in the service referral. A no show by the client is defined as the client not being present to provide a specimen to the Contractor at the designated time and place. All no shows must be reported to the DHHS case manager or supervisor by the end of the next business day, unless otherwise noted in the service referral. Laboratory test confirmation is defined as screening the collected specimen by a laboratory to detect the presence of a specific drug(s) or substance(s) and the concentration of the drug(s) or substance(s) as identified and requested in the Service Referral. Laboratory test confirmation includes the written verification of the results. The Contractor's drug testing protocol and policy shall be consistent with the Substance Abuse and Mental Health Services Administration (SAMHSA). The Contractor's drug testing protocol, policy, and rates shall be submitted to each Service Area Contract Liaison where the service will be provided.
6. Professional Partners Program (PPP) an evidenced-based wrap- around service that includes the following key components:
    - A clear point of access to services 24-hours a day, 7 days a week
    - A Professional Partner to assist families in navigating the behavioral health system

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- A single, coordinated assessment addressing multiple agency requirements
- Flexible funding designed to avoid specific rigid service categories that fail to address unique concerns of an individual family's situation

PPP combines an ecological assessment and treatment planning approach with wraparound services and intensive therapeutic case management. A service coordinator, referred to as a Professional Partner, is at the center of the program working in full partnership with each youth entering the Program and his or her family. The goal of the Professional Partners Program is to ensure the availability of an accountable individual to serve as an advocate, service broker, and liaison on behalf of the youth/young adult and his or her family when accessing services needed, to coordinate service components at all phases of treatment and support, also to ensure all elements of treatment and supportive services are planned for and provided.

NEBRASKA'S MAINTENANCE-OF-EFFORT QUALIFYING EXPENDITURES

To receive full federal TANF funding, Nebraska must have qualifying state expenditures to meet at least 75% of the 1995 level of expenditures. Effective October 1, 2007, Nebraska's TANF Maintenance-of-Effort (MOE) requirement is $28,375,365 at the 75% level and $30,267,056 at the 80% level.

The following are the qualifying state expenditures for Nebraska's TANF Maintenance-of-Effort requirement beginning FFY 2006, with the exception of Nebraska's Earned Income Tax Credit which began qualifying as a TANF Maintenance-of-Effort expenditure for FFY 2007:

1. *Cash Assistance*:
   Nebraska's Aid to Dependent Children (ADC) program provides cash assistance to low-income families with minor children to help to meet their basic needs. This program is funded with both TANF federal funds and state general funds. Eligibility is based on the same criteria for TANF cash assistance as found on pages 4 - 6, ELIGIBILITY FOR TANF.

2. *Emergency Assistance to Needy Families with Children (EA)*:
   Nebraska's Emergency Assistance program provides financial assistance and/or services to or on behalf of a needy child(ren) and any other members of the household to meet needs that have been caused by an emergency situation when the needs cannot be met because of destitution. The program provides a means to deal with financial situations that are threatening the health or wellbeing of an eligible child and family. Emergency Assistance benefits must be used to help return the family to a stable environment that they will be able to maintain. The Emergency Assistance program is funded with state general funds only.

   Emergency Assistance may be provided to a needy child and any other member of the household in which the child is living only if:

a. The child is age 18 or younger (a pregnant woman with no other children may be eligible);
b. The child is currently living with one or both parents, or is temporarily absent from their home and within six months before the month in which assistance is required, was living with a specified relative* or a legally appointed guardian or conservator** in a place of residence maintained as their own home;
c. Members of the household must be legally residing in the United States;
d. The household meets relevant income eligibility requirements. The family's gross monthly income must not exceed 185 percent of Nebraska's ADC Standard of Need for the family size; and
e. The destitution or need did not arise because the child (if age 16 or older and not in school) or the relative responsible for support and care refused without good cause to accept employment or training for employment or quit a job without good cause. However, if the child or family member refused without good cause to accept employment or training for employment or quit a job without good cause, but the emergency was not caused by this action, the family is still eligible for EA.

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* A specified relative is defined as a relative with whom a child must be living or have been living within six months prior to the month in which EA is requested. A specified relative includes a child's father, mother, grandfather, grandmother, brother, sister, stepfather, stepmother, stepbrother, stepsister, uncle, aunt, first cousin, second cousin, nephew or niece are specified relatives. These relatives may be half-blood relation, related by adoption, or from a preceding generation as denoted by prefixes of grand, great, great-great, or great-great-great. A child may also live with the spouse of any persons previously named even after the marriage has been terminated by death or divorce.

** Under Nebraska law, a guardian has the same powers, rights and duties that a parent has respecting his or her minor child and a conservator has all powers which he or she could exercise if not under a disability (Nebraska Revised Statutes §§30-2628 and 30-2637).

3. *Employment Assistance*:
Nebraska's *Employment First* program provides education, training, employment preparation activities, and supportive services along with other activities and services to recipients of ADC cash assistance. The *Employment First* program is designed to move families, who are receiving ADC cash assistance, quickly into employment so that they may become economically independent. In order to promote job advancement and job retention, supportive services may be provided after the loss of eligibility for ADC cash assistance due to earned income:
   a. Extended supportive services:
   Supportive services determined necessary to participate in all approved *Employment First* activities included in a participant's Self-Sufficiency Contract may be provided

for up to three months, if needed, after the loss of eligibility for ADC cash assistance due to earned income.

b. Transitional supportive services:
Supportive services determined necessary and critical for job retention may be provided for up to six months, if needed, after the loss of eligibility for ADC cash assistance due to earned income.

4. *Administrative Expenses*:
Nebraska expends funds to administer Nebraska's assistance programs. These administrative costs support staff and necessary overhead. These qualifying state expenditures are developed through our Cost Allocation Plan.

5. *Information Systems Expenses*:
Nebraska expends funds to provide information systems to provide needed information to staff regarding eligibility, client activities, cash payments and services for families receiving assistance. These qualifying state expenditures are developed through our Cost Allocation Plan.

6. *Child Care Assistance*:
Nebraska's Child Care Assistance program subsidizes child care costs for eligible families. Child care assistance is available at no cost to families receiving ADC cash assistance or whose gross earned and unearned income is at or below 100 percent of the Federal Poverty Level. Families whose incomes are above the current income standard for the full child care subsidy may be eligible for a partial child care subsidy if their gross earned and unearned income is at or below 125 percent of the Federal Poverty Level. Eligible families cannot be required to pay more than 20 percent of their gross income towards the cost of child care. Families must also show a need for receiving a child care subsidy, such as, but not limited to, job search, employment, education, training, incapacitated parent, and need to obtain medical care.

7. *Tribal TANF Programs:*
Nebraska provides a fair and equitable share of state Maintenance-of-Effort funds to Nebraska Tribes in support of their federally approved Tribal TANF programs. DHHS specifies that the state Maintenance-of-Effort funds provided to the Tribes be used for Tribal cash payments to eligible families. Eligibility is defined in their Tribal Family Assistance Plan (TFAP). DHHS requires the reporting of the use of these funds and the number of families served with these funds.

8. *Nebraska Earned Income Tax Credit (EITC):*
Most states levy state income taxes, but the tax burden on low-income families varies significantly depending on where they live. A growing number of states offset this burden with state earned income tax credits and/or state child and dependent care tax credits.

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These credits are typically based on provisions in the federal income tax code, but states make all decisions regarding eligibility and benefit levels.

To be eligible to claim the Nebraska EITC the individual must:

- Be a resident of the State of Nebraska, and
- Be eligible for and claim the federal EITC on their federal tax return.

This tax credit is now refundable, which means it will first be used to lower or eliminate any state income tax s/he might owe and if the credit is larger than what s/he owes in state tax the amount will be refunded.

Income eligibility criteria

Income eligibility rules same as federal EITC	Yes (2009)
Income limit for 1-parent family with 2 qualifying children	$40,295/year (2009)

Benefit level

Refundable credit available	Yes (2009)
Percent of federal EITC	10% (2009)
Max benefit for family with 2 qualifying children	$503/year (2009)

9. *Nebraska Child and Dependent Care Tax Credit*:
The Child and Dependent Care Tax Credit is a tax benefit that helps families pay for the child care they need in order to work or look for work. The credit is also available to families that must pay for the care of a spouse or an adult dependent who is incapable of caring for himself or herself. Nebraska is counting only the refundable portion of the Nebraska Child and Dependent Care Tax Credit as a qualifying state expenditure for Nebraska's TANF Maintenance-of-Effort requirement.

Income eligibility criteria

Income eligibility rules same as for federal credit	Yes (2008)
Income limit for family with 2 or more qualifying children	No limit (2008)

Eligible expenses

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Child care expenses eligible by same rules as federal credit	Yes (2008)

Benefit level

Refundable credit available	Yes (2008)
Benefit structure	Credit of 25-100% of federal credit, depending on income (2008)
Max benefit for family with 2 qualifying children	$2,100/year (2008)

10. *Respite Service for Children:*
DHHS, Office of Home and Community-Based Services offers respite service to caregivers who need a temporary break from care giving so they can come back refreshed and ready to provide good care again. Respite service pays someone to come into the home, take care of a child with disabilities or special needs, and give the primary caregiver a temporary break. This would include adult children caring for siblings with disabilities or special needs and parents of children with disabilities or special needs.

This program pays for respite services (someone to come into the home to care for a child with a disability or special needs to give the primary caregiver a temporary break). It is for people who are not receiving the service from another government program.

Caregivers who need a temporary break from providing care to persons of any age with special needs. Examples of special needs are developmental and physical limitations, emotional or behavioral disorders, chronic illness, Alzheimer's disease and related health concerns, or persons at risk of abuse and neglect.

Eligibility is based on income guidelines. However, if you have expenses directly related to the disability, these can usually be subtracted from the counted income. The person applying must have a caregiver. The program will provide up to $125 per client each month

Lifespan Respite Subsidy Program - Income Guidelines
The Lifespan Respite Subsidy Program serves clients whose monthly, adjusted gross income is at or below 310% of the Federal Poverty Guidelines. If eligible, the program will provide a payment for respite services up to $125 per client per month. Benefits may be saved for use up to three months.

COMPENDIUM OF PERFORMANCE MEASUREMENT ACTIVITIES

1. All outcome (goal, result) statements currently developed.

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Employment First Vision:
People receiving temporary welfare assistance will overcome poverty by achieving an optimal level of sustained employment; successful employment will be supported by an integrated, multifaceted service delivery system that is family focused, easily accessed, highly responsive, and tailored to individual need and circumstance.

Employment First Philosophical Underpinnings:

- *Employment First* benefits and services should be temporary for most clients and designed to assist clients to transition to employment.
- *Employment First* policies, procedures and processes should support the values of work, family, opportunity and personal responsibility.
- *Employment First* services should be family centered, recognizing that the client is the decision-maker within program parameters.
- The strengths of clients and communities should serve as the foundation of *Employment First* self-sufficiency plans. Empowerment of clients should be the goal.
- *Employment First* should be based on a partnership among Health and Human Services staff, clients and the community.
- Personnel of all levels should have an understanding of and commitment to the collaborative process.
- *Employment First* services should enhance the dignity of clients and reinforce the personal responsibility of clients.

Employment First Philosophy:
Inherent within the philosophical beliefs of the *Employment First* program are the core values that most individuals are capable of being economically independent and have a personal responsibility to support their children; that work provides financial and emotional rewards; that public assistance is a temporary measure; and that DHHS along with the families will work in partnership to meet the families goal of achieving their highest level of economic independence.

Employment First Goal:
The primary purpose of *Employment First* is to provide temporary, transitional support for Nebraska families so that economic self-sufficiency is attained in as expeditious a manner as possible through the provision of training, education, and employment preparation. Nebraska is dedicated to improving the standard of living and quality of life for each family living in the State that has had to turn to public assistance to help support their family in times of need. We will accomplish this by promoting personal responsibility and empowering parents to support their families.

Employment First Objective:
To provide the programs and services necessary to help clients get higher paying jobs with benefits; increase their opportunities; develop their job advancement capabilities; improve the quality of life for their families; reduce family stress; to be more successful at parenting

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and building healthy families; integrate with their communities; increase the rate of school completion for their children; preventing teen pregnancy and increasing the time before second births; and end long term welfare dependency and multigenerational dependency.

2. All performance measures/performance indicators that have been developed to measure each outcome/goal/result.

    a. Federal data reports (i.e. caseload reduction, participation rate, entered employment rate, job retention rate, reasons for case closure, earnings gain, teen birth rate, etc.). The only federal standard established is for the work participation rate.
    b. Federal High Performance Bonus measurements (achievement and improvement in the Job Entry Rate, Success in the Workforce Rate - a combination of the job retention rate and earnings gain rate, Family Formation and Stability, Medicaid/SCHIP Enrollment, Food Stamps, and Child Care Subsidies). No federal standard established.
    c. Federal Maintenance-of-Effort expenditure report.
    d. Federal TANF expenditure report.

3. All performance measures/performance indicators that have been developed even in the absence of outcomes/goals/results.

    a. Contractor's reports on various performance standard achievements.
    b. Nebraska Adolescent Pregnancy Network's Goals and Objectives report.
    c. Welfare in Nebraska report.
    d. Institute for Social and Economic Development 1997 evaluation of the Employment First program (two reports).
    e. American Institute for Full Employment 2000 evaluation of the Employment First program.
    f. Mathematica Policy Research, Inc. 1999 report on implementing welfare reform in Nebraska.
    g. Mathematica Policy Research, Inc. 2001 evaluation of the Employment First program (two phases).
    h. Mathematica Policy Research, Inc. 2002 evaluation on the Employment First program's preparation of clients for work and addressing their obstacles.
    i. Mathematica Policy Research, Inc. 2002 evaluation of employment experiences and challenges among urban and rural welfare clients in Nebraska, opportunities for improving the Employment First program.
    j. Mathematica Policy Research, Inc. evaluation of Employment First rural welfare-to-work strategies, 2002-2007.
    k. Welfare Peer Technical Assistance Network.
    l. TANF Annual Report to Congress.

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m. Multitudes of reports and surveys using Nebraska data conducted by major research groups on many facets of the welfare reform law, it's implementation and affects on families and children.
n. Custom reports on recidivism, welfare recycling, long term receipt, cost per client, demographics of cases, contract costs and performance, educational attainment, caseload trends, budget expenditures, types of expenditures, etc.

CERTIFICATIONS AND ASSURANCES

- Nebraska will operate a statewide program which provides temporary financial assistance for needy families with minor children and a mandatory work program known as the *Employment First* Program.
- Nebraska will operate a Child Support Enforcement Program as outlined under the State Plan approved under Part D.
- Nebraska will operate a Foster Care and Adoption Assistance program under the State Plan approved under part E and 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.
- Nebraska will operate these programs under the administrative direction of DHHS.
- Nebraskans were provided the opportunity to review and inspect this TANF State Plan and submit comments during a public comment period prior to the submission of this TANF State Plan. Comments were accepted by written or electronic mailings.
- Nebraska will serve all political subdivisions in the State fairly and equitably.
- Nebraska is committed to the continued recognition of the sovereignty of the Indian Nations and we will provide each member of an Indian Tribe, who is domiciled within Nebraska and is not eligible for assistance under a Tribal Family Assistance Plan approved under section 412, with equitable access to assistance under this Plan.
- Nebraska has established and is enforcing 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.
- Nebraska will continue to offer services, where appropriate, to those who are victims of domestic violence and has taken every step possible to ensure that the programs administered by the State do not place individuals at further risk of such violent behavior, sexual abuse or extreme cruelty. Nebraska will:
  - Screen and identify individuals receiving ADC cash assistance under this part for domestic violence, sexual abuse or being subject to extreme cruelty while maintaining the confidentiality of those individuals;
  - Refer such individuals to counseling and appropriate services;
  - Waive the work program requirements and time limits (for up to six month or longer, if necessary), and child support cooperation requirements in cases where compliance with such requirements would make it more difficult for individuals receiving ADC cash assistance under this part to escape domestic violence, be unfairly penalized, or put at greater risk of further domestic violence.

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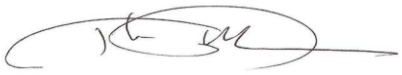
Nebraska assures that the following provisions of law will apply to programs and activities funded under this program:

The Age Discrimination Act of 1975
Section 504 of the Rehabilitation Act of 1973
The Americans with Disabilities Act of 1990
Title VI of the Civil Rights Act of 1964

Nebraska shall make available to the public a copy of this TANF State Plan. The TANF State Plan will be posted on the DHHS web site. Those who do not have internet access can receive an electronic copy or a hardcopy of the TANF State Plan by calling toll free or writing the Nebraska Department of Health and Human Services, Division of Children and Family Services, Economic Assistance Section.



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Date

Thomas D. Pristow, MSW, ACSW, Director
Division of Children & Family Services
Department of Health and Human Services
Designated Lead Agency

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APPENDICES

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Appendix A: Performance Goals for the Core Programs

Detailed guidance is pending from one or more Federal partners regarding data definitions, sources, validation, and submission requirements. Once this guidance is received and processed by all of the core programs, Appendix A will be completed.

	Year:		Year:	
	Proposed/ Expected Level	Negotiated/ Adjusted Level	Proposed/ Expected Level	Negotiated/ Adjusted Level
Employment (Second Quarter after Exit)				
Adults				
Dislocated Workers				
Youth* (Education, Training or Employment)				
Adult Education				
Wagner-Peyser				
Vocational Rehabilitation				
Employment (Fourth Quarter after Exit)				
Adults				
Dislocated Workers				
Youth* (Education, Training or Employment)				
Adult Education				
Wagner-Peyser				
Vocational Rehabilitation				
Median Earnings (Second Quarter after Exit				
Adults				
Dislocated Workers				
Youth				
Adult Education				
Wagner-Peyser				
Vocational Rehabilitation				

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Credential Attainment Rate				
Adults				
Dislocated Workers				
Youth				
Adult Education				
Wagner-Peyser	**Not Applicable**	**Not Applicable**	**Not Applicable**	**Not Applicable**
Vocational Rehabilitation				
Measurable Skill Gains				
Adults				
Dislocated Workers				
Youth				
Adult Education				
Wagner-Peyser	**Not Applicable**	**Not Applicable**	**Not Applicable**	**Not Applicable**
Vocational Rehabilitation				
Effectiveness in Serving Employers				
Adults				
Dislocated Workers				
Youth				
Adult Education				
Wagner-Peyser				
Vocational Rehabilitation				

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Appendix B: 2015 Battelle Report (Target Industry Report)

August 6, 2015

Target Industry Report

In support of the Nebraska Department of Economic Development's (DED) strategic planning and economic development ecosystem assessment, the NDED Research Division is providing this updated report of Nebraska's targeted industries. This report will identify Nebraska's targeted industries and related industry clusters, and provide data on these industries and industry groups. The targeted industry groups identified in the 2010 Battelle Technology Partnership Practice report, *Growing Jobs, Industries, and Talent: A Competitive Advantage Assessment and Strategy for Nebraska*, and will be reviewed and updated with data from 2008 through 2014—from the start of the "Great Recession" through the most current complete reporting year. Data used in this report are the most recent available data as of June 30, 2015. The Battelle report identified over 240 primary industries that exist or could exist in Nebraska, based on the North American Industry Code System (NAICS). These industries were than combined into 12 primary industry clusters, and then provided measures of the performance of these industry groups in Nebraska from 2001 through 2007. The end date of 2007 was chosen to coincide with the end of the business cycle that began in 2001, with the trough occurring in November of that year [National Bureau of Economic Research, Business Cycle Dating Committee, 2012]. The approach taken in this report will be, whenever possible, to append data to that used in the Battelle report. Rather than omit the period of the Great Recession, from the US economy's peak in December 2007 through June 2009, when the US economy began its most recent recovery, this report will append the 2008-14 data to any revisions of the 2001-07 data used by Battelle. There may be a natural tendency to prefer to use a period of recovery from the end of one recession to the year of the next peak; however, there are some advantages to reporting how the state's industries fared through the entire business cycle. This is especially true as Nebraska appeared to have weathered the last recession better than most states.

Standard measures such as location quotients and shift-share analyses will be used to update the list of Nebraska's targeted industry groups, using Battelle's targeting analysis for prioritizing economic development efforts among industries in these industry groups.

This report will also include comparisons of Nebraska to other states in terms of such factors as industrial specialization, tax climates, population, cost of labor, measures of innovation, access to capital, and education programs. Finally, this report will provide a great deal of 50-state data

for the purpose of comparing Nebraska's economic performance, and for the purpose of proposing a set of states for benchmarking Nebraska's future performance.

The NDED Research Division was not able to recreate all of the tables and metrics used by Battelle in their report. Most often this was due to Battelle's use of proprietary data, which NDED does not have access to. This inability to extend Battelle's work is greatest where the 2010 report used IMPLAN to model the value-added impacts of the industry clusters to Nebraska's economy. In most cases, alternative sources of data are available for extending the review through the current period.

Assessment of Nebraska's Primary Industry Groups

In 2010, the Battelle Technology Partnership Practice conducted a detailed assessment of the building blocks of Nebraska's economy, focusing on the position of the state's industry clusters, its innovation preparedness, and its talent development. This assessment involved in-depth quantitative analysis of a wide variety of data sources on Nebraska's industries, technology drivers, and talent base. Through this effort Battelle identified 12 primary industry clusters that drive Nebraska's economic growth.

The Battelle report focused on identifying primary industries – basic industries that support the export market, or alternatively, reduce the local demand for imported goods – rather than service industries that support local markets. "Export" meaning that the goods or services produced in Nebraska are sold outside Nebraska, either nationally or internationally. Supporting this approach, the Battelle report notes that "the most effective way to advance the economic development of primary industries is to focus on the industry clusters found within a state's economic base industries" [Battelle, 2010, p.8].

Twelve primary industry clusters were identified as drivers of economic growth in Nebraska. Because there is no standard list of industry clusters defined for all states, defining a set of industry clusters for Nebraska required a detailed analysis of industries found across the state that is focused on economic base activities, and then deciding how and where industries fit into a cluster. This was done in consultation with the Nebraska Department of Economic Development and an advisory committee made up of economic development stakeholders. From this process Battelle identified more than 240 detailed primary industries involved in economic base activities in Nebraska and organized them into the 12 primary industry clusters identified below. A complete list of industries is included in the appendix.

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Battelle's 2010 Nebraska Industry Clusters	
Agricultural Machinery	Agriculture & Food Processing
Biosciences	Business Management & Administrative Services
Financial Services	Health Services
Hospitality & Tourism	Precision Metals Manufacturing
Renewable Energy	Research, Development, & Engineering Services
Software & Computer Services	Transportation, Warehousing, & Distribution Logistics

Battelle noted that even though health services are not normally viewed as an economic base activity, it is included in the list of industry clusters because "health services are widely considered a critical economic and workforce driver in regional economies across Nebraska, and serve to attract patients from neighboring states" [Battelle, 2010, p. 10]. Another of the Battelle clusters, renewable energy, was counted as a cluster, even though there was not enough activity in any industry other than ethanol production to measure.

Service industries are not typically viewed as an economic base activity, as they primarily consist of businesses that typically serve local Nebraska customers. Like retail stores, service industries are important for serving local needs and ensuring a high quality of life in the state. However, they are not considered to be "wealth-creating" sectors of the economy, as they typically do not result in additional exports nor do they reduce import costs for the state. In short, the report included health services cluster in their list of primary industry clusters because they "are widely considered a critical economic and workforce driver in regional economies across Nebraska and serve to attract patients from neighboring states, this sector was included as a primary industry driver" [Battelle, 2010, p. 10].

After identifying Nebraska's primary industry clusters, Battelle assessed the performance of the industry groups in terms of the concentration of the industry cluster in the state, employment, and economic output.

Relative concentration of an industry cluster is a measure of how specialized an industry cluster is in a specific region compared to the nation, and is an indication of the "competitive advantage" for the cluster relative to the nation. The measure of this specialization is the location quotient (LQ), which is found by dividing the proportion of a region's employment in an industry cluster by the same proportion on the national level. That is, $LQ_i = \frac{e_i}{e} / \frac{E_i}{E}$, where e_i is the regional employment in industry *i*, *e* is total employment in the region, E_i is national employment in industry *i*, and *E* is total employment at the national level. An LQ less than 1 indicates that the ratio of employment at the regional level is less than the ratio at the national level, which implies that the region is underrepresented in the industry. An LQ greater than 1 indicates a higher relative concentration of the industry locally, and "an LQ greater than or equal to 1.20 denotes an employment concentration significantly above the national average, and thus [the industry is] considered 'specialized'" [Battelle 2010, p. 10].

The other performance measures used by Battelle are more straightforward. The report looked at whether an industry cluster had gained or lost employment between years. The third metric used to assess performance is the relative employment growth of the local industry cluster compared with the growth of the same cluster at the national level between two time periods.

The choice of time periods may be the most difficult part of the analysis. "It is best to compare changes in employment over an entire national business cycle (peak to peak) to ensure an 'apples to apples' comparison" [Battelle, 2010, p. 10].

For their performance assessment, the Battelle study compared data from 2001 and 2007, even though the 2008 data were available. The Battelle report's timing was fortuitous in terms of the ability to pick an entire business cycle. On December 1, 2008, the NBER's Business Cycle Dating Committee announced that the peak of the post-2001 expansion occurred in December 2007, and further, on September 20, 2010, the committee announced that the recession that began in January 2008 officially ended in June 2009; hence Battelle knew before they completed their work that the 2001 through 2007 period constituted a completed business cycle.

The current review does not have the benefit of that knowledge. While there are data available through 2014, it is unknown at this time when the current business cycle will end. Even taking the unofficial definition of a recession as two consecutive quarters of negative real Gross Domestic Product (GDP) growth, the negative growth reported in the first quarter 2015 does not necessarily mean that the US economy is in recession, nor does it provide a date for the end of the expansion that started in mid-2009. Even if 2015 should mark the end of the last expansion, it is unlikely that the NBER would officially date the end of the most recent business cycle anytime this year. Rather than attempt to compare industry data from one business cycle to industry data from another, possibly incomplete business cycle, NDED's Research Division chose to append the 2008–14 data to the 2001–07 data used by Battelle.

Another reason for using appended data, beyond not knowing the timing of the business cycle, is the relative severity of the 2008-09 recession. Of the 11 post-war US recessions, the most recent recession was the worst, both in terms of the length of the downturn and the depth of the decline in economic output of the US economy. The Great Recession lasted 18 months, and real GDP declined 4.2%, whereas the average post-war recession lasted 11.1 months and real GDP declined by 1.1% [NBER, BEA]. Nebraska's real GDP grew at an annual compounded rate of 2.3% from 2008 through 2014, the third fastest of all the states, and for the entire 2001–14 period, Nebraska's annual compounded growth rate was 2.4%, the seventh fastest of the states. This compares to 2.7% and a rank of 21st for the entire 2001–14 period. The two faster-growing states in the 2008–14 period, North Dakota and Texas, benefited significantly from growth in their energy sectors. The US economy grew at a 1.2% rate over the 2008–14 period, and six states still have negative annual growth rates five years after the end of the recession. Given that Nebraska appeared to do better than most states during the recession, reviewing the performance of the state's primary industry groups over a long period, through the last complete business cycle to the present, may shed some light on why the Nebraska economy performed better than most other states. [BEA State GDP Comparison]. In addition, looking at the long series should not penalize those industry groups that tend to do poorly during recessions or reward those that tend to be "recession-proof."

Employment-Based Trends and Target Assessment of Nebraska's Industry Clusters

The Battelle report found that between 2001 and 2007 the industry clusters identified in the report performed strongly in employment measures. A full three-quarters of the clusters fared well, based on employment criteria. Five of the 12 clusters were classified as current strengths, three were classified as emerging strengths or emerging opportunities, and the remaining four were classified as retention targets.

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The employment-based target assessment criteria are based on three measures. The first is the location quotient, used to determine if the industry is specialized in Nebraska. Specialized industries have an LQ greater than or equal to 1.2. The second criterion is employment growth over the time span of the analysis. The third criterion is whether employment in the local industry grew faster or slower than the same industry at the national level.

Industry clusters that were specialized in Nebraska, and that generated additional employment in Nebraska between 2001 and 2007, and had rates of employment growth greater than the national growth rate for the same industry were classified as current strengths. The five industry clusters that met all three of the criteria were financial services; transportation, warehousing, and distribution logistics; precision metals manufacturing; biosciences; and renewable energy.

Next, industry clusters that were not specialized in Nebraska, but had increased employment locally, were classified as emerging strengths or emerging opportunities, depending upon their relative employment growth compared with national employment growth in those clusters. Battelle identified three clusters that met these criteria. "Of these three, R&D and engineering services stands out because it outpaced the national employment growth rate, while the other two—health services and hospitality and tourism—grew but below the national average" [Battelle, 2010, p.11].

Table 1. Nebraska Primary Industry Clusters, Target Assessment, Battelle 2010, page 12.

Industry	Degree of Specialization, 2008 (LQ)	NE Employment Change, 2001-07	US Employment Change, 2001-07	Competitive Share Gain or Loss, 2001-07 (% Pt. Change vs. US)	Target Assessment
Total Employment	**1.00**	**3.60%**	**4.30%**	**-0.7**	**N/A**
Agricultural Machinery	7.43	-4.4%	-4.6%	0.1	Retention
Agriculture & Food Processing	2.26	-4.8%	-4.3%	-0.5	Retention
Biosciences	1.21	20.6%	15.3%	5.3	Current Strength
Business Management & Administrative Services	1.22	6.3%	9.1%	-2.8	Retention
Financial Services	1.38	9.5%	6.4%	3.1	Current Strength
Health Services	1.01	8.0%	14.0%	-6	Emerging Opportunity
Hospitality & Tourism	0.84	1.0%	1.6%	-0.6	Emerging Opportunity

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Precision Metals Manufacturing	1.15	4.6%	-10.2%	14.9	Current Strength
Research, Development, & Engineering Services	0.56	34.2%	5.5%	28.7	Emerging Strength
Software & Computer Services	1.14	-16.8%	1.3%	-17.5	Retention
Transportation, Warehousing, & Distribution Logistics	1.98	27.4%	3.3%	24.1	Current Strength
Renewable Energy (Biofuels)	28.45	547.2%	116.2%	431	Current Strength

Source: Battelle analysis of Bureau of Labor Statistics, QCEW data from IMPLAN. Note: Competitive Share changes calculated on unrounded numbers. LQ = Location Quotient.

Finally, four Nebraska primary industry clusters identified by Battelle, which were specialized but either did not increase Nebraska employment between 2001 and 2007 or grew Nebraska employment at a rate slower than the industry nationally, were identified as retention targets. Of these four clusters, only business management and administrative services enjoyed increased employment in Nebraska, and only one of the four enjoyed a greater rate of employment growth in Nebraska than nationally. The other two retention targets, agriculture and food processing, and software and computer services, lost employment and ended the 2001–2007 business cycle with slower employment growth in Nebraska than at the national level. The table below, reproduced from the 2010 Battelle report, provides the information used in Battelle's target assessment for Nebraska's primary industry clusters.

Table 2 presents employment levels and growth rates for Battelle's primary industry clusters for Nebraska and for the US for 2008 and 2014. The data for this time period represented in Table 2 will be appended to the original Battelle report. In addition, the Nebraska and US growth rates are shown for the 2008–2014 period.

For some of the clusters, there are some notable differences in employment growth trends between the time periods. For example, note that the rate of employment growth in the agricultural machinery cluster was negative for both Nebraska and the US as a whole between 2001 and 2007; however, employment in both areas was positive in the 2008–2014 period. Conversely, in the Financial Services and Business Management and Administrative Services clusters, Nebraska and US employment changed from positive for both areas in the early period to negative for both in the later period. Agriculture and Food Processing in Nebraska reversed a negative employment trend and started positive growth since the beginning of the recession. The US trend for this industry group remained negative in the later period, however. Some industry clusters that showed positive employment growth in the early period, both at the state and national level, retained this trend in the later period; these clusters included Health Services, Software and Computer Services, and Renewable Energy. The Research and

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Development cluster saw rapid growth in Nebraska in the early period, but saw the trend reverse in the later period.

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Table 2. Employment Levels and Growth by Targeted Industry Group, 2008–2014

Target Industry Title	NE 2008	NE 2014	US 2008	US 2014	NE % Change 2008-14	U.S. % Change 2008-14
Total Employment	**766,991**	**786,782**	**113,188,643**	**115,557,595**	**2.6%**	**2.1%**
Agricultural Machinery	10,058	11,153	199,835	206,697	10.9%	3.4%
Agriculture & Food Processing	54,889	55,746	3,055,208	2,461,387	1.6%	-19.4%
Biosciences	7,500	5,950	1,244,361	1,695,204	-20.7%	36.2%
Business Management & Administrative Services	43,557	41,178	5,276,384	5,048,338	-5.5%	-4.3%
Financial Services	50,799	48,782	5,199,538	5,044,404	-4.0%	-3.0%
Health Services	56,509	59,428	8,019,696	8,804,768	5.2%	9.8%
Hospitality & Tourism	12,545	15,190	2,890,443	2,426,488	21.1%	-16.1%
Precision Metals Manufacturing	16,495	10,484	2,111,649	1,501,099	-36.4%	-28.9%
Research, Development, & Engineering Services	6,213	5,765	1,078,876	1,614,488	-7.2%	49.6%
Software & Computer Services	15,244	16,748	1,966,971	2,374,820	9.9%	20.7%
Transportation, Warehousing, & Distribution Logistics	38,077	36,933	3,671,257	3,574,590	-3.0%	-2.6%
Renewable Energy (Biofuels)	1,770	1,884	9,182	10,582	6.4%	15.2%

Source: Data from BLS, QCEW, 2015; Calculations by NDED, 2015
Note: Employment is from published BLS data, which may not be complete for Nebraska. In the case of incomplete data, US employment for that industry is dropped, to provide consistent results.

Table 3 presents employment levels and growth rates for Battelle's primary industry clusters for Nebraska and for the US for 2008 and 2014. In addition, the Nebraska and US growth rates are shown for the 2008–2014 period.

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Table 3. Employment Levels and Growth by Targeted Industry Group, 2001–2014

Target Industry Title	NE 2001	NE 2014	US 2001	US 2014	NE % Change 2001-14	US % Change 2001-14
Total Employment	**735,492**	**786,782**	**109,304,802**	**115,557,595**	**7.0%**	**5.7%**
Agricultural Machinery	9,762	11,153	207,292	206,697	14.2%	-0.3%
Agriculture & Food Processing	55,484	55,746	3,096,356	2,461,387	0.5%	-20.5%
Biosciences	5,143	5,950	805,222	1,454,514	15.7%	80.6%
Business Management & Administrative Services	38,245	41,178	4,498,429	5,048,338	7.7%	12.2%
Financial Services	44,406	48,782	5,008,173	5,044,404	9.9%	0.7%
Health Services	51,462	59,428	6,877,555	8,804,768	15.5%	28.0%
Hospitality & Tourism	14,687	15,190	2,239,602	2,426,488	3.4%	8.3%
Precision Metals Manufacturing	16,081	10,484	2,462,129	1,468,803	-34.8%	-40.3%
Research, Development, & Engineering Services	4,532	5,765	1,401,954	1,614,488	27.2%	15.2%
Software & Computer Services	18,138	16,748	1,865,492	2,374,820	-7.7%	27.3%
Transportation, Warehousing, & Distribution Logistics	29,897	36,933	3,384,696	3,092,953	23.5%	-8.6%
Renewable Energy (Biofuels)	277	1,884	3,254	10,582	580.1%	225.2%

Source: USDOL, BLS, QCEW, 2015; Calculations by NDED, 2015

Note: Employment is from published BLS data, which may not be complete for Nebraska. In the case of incomplete data, US employment for that industry is dropped, to provide consistent results.

In the original Battelle report three of the clusters experienced negative employment growth during the period of the study. During the 2008–2014 period, half of the clusters experienced a loss of employment between the start of the Great Recession and 2014 (Table 2). Extending the time period of the study to 2014 results in only two of the Nebraska industry group experiencing negative employment growth. Except for Precision Metals Manufacturing and Software and Computer Services, all 12 industry groups saw positive employment growth between 2001 and 2014. However, four of the 12 clusters experienced negative employment

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growth at the national level. Table 4 presents the data needed to update the target assessment for the industry clusters identified in the Battelle report. The time frame for the updated assessment is 2001 through 2014.

Table 4. Nebraska Primary Industry Groups, Target Assessment Update, 2001–2014

	Location Quotient	Employment Growth Analysis, 2001-2014			
Target Industry Title	**Degree of Specialization 2014 (LQ)**	**Nebraska Employment Change**	**US Employment Change**	**Competitive Share Gain or Loss, 2001-14 (% Pt. Change vs. US)**	**Target Assessment**
Total Employment	**1.00**	**7.0%**	**5.7%**	**1.3%**	**N/A**
Agricultural Machinery	7.93	14.2%	-0.3%	14.5%	Current Strength
Agriculture & Food Processing	3.33	0.5%	-20.5%	21.0%	Current Strength
Biosciences	0.60	15.7%	80.6%	-64.9%	Emerging Opportunity
Business Management & Administrative Services	1.20	7.7%	12.2%	-4.6%	Retention
Financial Services	1.42	9.9%	0.7%	9.1%	Current Strength
Health Services	0.99	15.5%	28.0%	-12.5%	Emerging Opportunity
Hospitality & Tourism	0.92	3.4%	8.3%	-4.9%	Emerging Opportunity
Precision Metals Manufacturing	1.05	-34.8%	-40.3%	5.5%	Emerging Strength
Research, Development, & Engineering Services	0.52	27.2%	15.2%	12.0%	Emerging Strength
Software & Computer Services	1.04	-7.7%	27.3%	-35.0%	Emerging Opportunity
Transportation, Warehousing, &	1.75	23.5%	-8.6%	32.2%	Current Strength

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Distribution Logistics					
Renewable Energy (Biofuels)	26.15	580.1%	225.2%	354.9%	Current Strength

In the original Battelle report, these five Nebraska industry clusters were identified as "current strengths" in the target assessment; Biosciences; Financial Services; Precision Metals Manufacturing; Transportation, Warehousing, and Distribution Logistics; and Renewable Energy (Table 1). In the expanded time frame, five clusters are again classified as current strengths, using the same scoring criteria as the 2010 Battelle report, with only Financial Services and Research, Development, and Engineering Services remaining as current strengths. Two industries dropped from current strengths to emerging opportunities; these were Biosciences and Precision Metals Manufacturing. The Business Management and Administrative Services cluster remained a retention target. The Precision Metals Manufacturing cluster dropped from a current strength based on the 2001–2014 data to an emerging strength based on the expanded data, due to a reduction in the location quotient, which now indicates that this cluster is no longer an area of specialization in Nebraska's economy. For the same reason, Software and Computer Services slipped from a retention target to an emerging opportunity.

A Shift-Share Analysis of Nebraska's Targeted Industry Groups

In addition to using location quotients for updating the target assessment of the industry clusters identified in the Battelle report, NDED's Research Division decided to make use of shift-share analysis, another common metric in regional analysis. While Battelle did not appear to make explicit use of this tool, the target assessment in the 2010 report relied on results that are important parts of a shift share analysis.

Shift share is a method of attributing changes in a regional industry's employment level to three components: (1) a national growth component (NS) defined as the share of local employment growth attributed to growth of the national economy); (2) an industrial mix component (IM) defined as the share of local employment growth attributed to growth within that cluster nationally; and (3) a competitive, or regional, share (RS) defined as the local growth rate in the industry cluster relative to the national growth rate in the cluster—the share of local employment growth attributed to unique local factors that have caused growth or decline in a cluster.

In a shift-share analysis, the total change in employment between two periods for an industry is equal to the sum of the three components. The formula for the shift share is $e_i^{t+n} - e_i^t = NS_i + IM_i + RS_i$, where e_i^t is employment for industry *i* at time *t*, and *n* is the number of years in the analysis.

The first component, national growth or national share, shows how much of the regional industry's growth is explained by the overall health of the national economy. The formula for determining the national share is $NS_i = e_i^t \times (G)$, where *G* is equal to the employment growth rate of the entire national economy for the period of the analysis.

The industrial mix component represents the share of regional industry employment growth that is explained by the growth of the industry at the national level. If a particular industry were growing at a faster rate than the economy as a whole, the industry mix would be greater than the national share component. The formula for determining the industrial mix is $IM_i = e_i^t \times$

$(G_i - G)$, where G_i is equal to the employment growth rate of industry *i* at the national level for the period of the analysis.

The regional share component determines the share of the change in regional employment due to competitive advantages of the region for the industry in question. A regional comparative productive advantage could be due to factors such as higher productivity, local raw materials or inputs, deployment of advanced technologies, better management or market access, human capital advantages, and so on. The formula for determining the industrial mix is $RS_i = e_i^t \times (g_i - G_i)$, where g_i is equal to the employment growth rate of industry *i* at the regional level for the period of the analysis.

A shift-share analysis was performed using the Nebraska industry clusters identified in the Battelle report for the 2001-2014 period. Table 5 presents the results of this analysis along with the location quotients for the beginning and end of the study period.

The regional, or competitive, share is shown in the third column of the shift-share analysis. If the competitive share is positive, it signals that the region has a comparative productive advantage. The number for each industry represents the number of jobs in the region that are due to the comparative advantage. The Nebraska industry clusters with a comparative advantage over the study period include Agricultural Machinery; Agriculture and Food Processing; Financial Services; Precision Metals Manufacturing; Research, Development, and Engineering Services; Transportation, Warehousing, and Distribution Logistics; and Renewable Energy.

The last column under the shift-share subheading is labeled "Total Job Growth" and represents the total change in employment for each industry over the study period. It also represents the sum of the national share, industry mix, and regional shift. Note that all Nebraska industry groups experienced increased employment between 2001 and 2014, except Precision Metals Manufacturing and Software and Computer Services.

Table 5. Location Quotients and Shift Share Analysis by Targeted Industry Group, 2001–2014

	Location Quotient		Shift-Share Analysis, 2001-2014			
Target Industry Title	**2001**	**2014**	**National Share**	**Industry Mix**	**Regional - Competitive Shift**	**Total Job Growth**
Agricultural Machinery	7.00	7.93	558	(586)	1,419	1,391
Agriculture & Food Processing	2.66	3.33	3,174	(14,552)	11,640	262
Biosciences	0.95	0.60	294	3,853	(3,340)	807
Business Management & Administrative Services	1.26	1.20	2,188	2,487	(1,742)	2,933
Financial Services	1.32	1.42	2,540	(2,219)	4,055	4,376

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Health Services	1.11	0.99	2,944	11,477	(6,455)	7,966
Hospitality & Tourism	0.97	0.92	840	385	(723)	503
Precision Metals Manufacturing	0.97	1.05	920	(7,408)	891	(5,597)
Research, Development, & Engineering Services	0.48	0.52	259	428	546	1,233
Software & Computer Services	1.44	1.04	1,038	3,915	(6,342)	(1,390)
Transportation, Warehousing, & Distribution Logistics	1.31	1.75	1,710	(4,287)	9,613	7,036
Renewable Energy (Biofuels)*	12.65	26.15	16	608	983	1,607
Target Industry Totals			**16,482**	**-5,900**	**10,545**	**21,127**

Source: Data from BLS, QCEW, 2015; Calculations by NDED, 2015

*Battelle includes only one sector (ethyl alcohol manufacturing) in this cluster.

The precision metals cluster experienced a significant drop (-7,408) in the industry mix component, which indicates that this cluster had slower growth in Nebraska than these industries had in the rest of the county. Yet at the same time, this cluster appears to have some competitive advantages in Nebraska, because the regional shift component remained positive. The Software and Computer Services cluster experienced a drop of 6,342 jobs in the regional shift component of the analysis. This indicates a decline in productivity. This could be due to limited market access in Nebraska, or it could be due to a shift between clusters resulting in reduced employment in one cluster and expanding employment in one or more other clusters. One possibility is that employees in software and computer businesses have found their skills in higher demand in financial and business management businesses, or that owners of software and computer businesses have found it advantageous to specialize as support services for particular industries, especially in Financial Services and Business Management & Administrative Services. This could explain why the location quotient for Software and Computer Services dropped, along with employment in this industry.

Table 5 also presents location quotients for each industry cluster, indicating the degree of specialization of the cluster in Nebraska in 2001 and 2014. Comparing the measure for the two dates indicates whether the Nebraska industry cluster has become more or less specialized over time. Five clusters are considered specialized (LQ ≥ 1.2) in 2001 and have increased their level of specialization during the 14-year study period. These are the Agricultural Machinery; Agriculture and Food Processing; Financial Services; Transportation, Warehousing, and Distribution Logistics; and Renewable Energy clusters. Two industry groups, Precision Metals Manufacturing and Research, Development, and Engineering Services, while not specialized in Nebraska, became more specialized during the study period. Two groups which were specialized in 2001 became less specialized during the study period. The Business Management and Administrative Services cluster had saw its LQ drop from 1.26 to 1.20, but it remains an area of specialization in Nebraska. However, the Software and Computer Services cluster dropped from an initial LQ of 1.44 to 1.04 in 2014, and, while still concentrated, is no longer considered to be an area of specialization in Nebraska. Finally, three industry groups that were

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not specialized in Nebraska in 2001, Biosciences, Health Services, and Hospitality and Tourism, experienced a reduction in the level of concentration during the study period.

Conclusions

The performance of the targeted industry groups identified in the 2010 Battelle Technology Partnership Practice report, *Growing Jobs, Industries, and Talent: A Competitive Advantage Assessment and Strategy for Nebraska*, was reviewed based on updated data available to the Nebraska Department of Economic Development's Research Division. The primary industry clusters identified by Battelle, for the most part, held up well through the 2008–2014 period. Even in cases where a specific industry or cluster of industries performed poorly since the Battelle report was issued, it would seem premature to suggest changes to the clusters.

First of all, the clusters were defined through a multifaceted process that has not been repeated in this review. There does not appear to be any case where a strong argument can be made to move industries in or out of the current definition of a cluster or to move industries between clusters. Second, even where an argument could be made that a particular cluster does not represent a primary industry, the industries that define that cluster still appear to belong in the same group. For these reasons, the Research Division does not suggest making changes to the Battelle clusters at this time. However, any future revisions to NAICS codes should be reviewed in order to determine whether a new industry is defined or whether an existing industry becomes two or more new industries through the division of a current code into two or more new codes, and to determine which clusters the new industries might belong.

Despite our recommendations for no changes at this time, a case could be made for reviewing the Health Services and Biosciences clusters. Battelle cautioned that the Health Services cluster perhaps did not meet the strict definition of a primary industry cluster, as many of the industries served local markets. These industries are important to local labor markets and the quality of life in their communities; however, many of the industries included in the cluster do not serve large percentages of consumers from outside the state. However, this may change for portions of the Health Services cluster, as defined by Battelle. For example, the University of Nebraska Medical Center (UNMC) announced the building of the Buffett Cancer Center, a $323 million, 575,000-square-foot hospital and research laboratory. This project has the potential for bringing in patients and research funding from outside Nebraska. In addition, UNeMed, the technology transfer arm of UNMC, has been successful in increasing the number of new inventions from 161 in 2000–04, to 404 in 2010–14 [UNeMed, 2014 Annual Report, p. 8]. In addition, UNMC and the University of Nebraska–Omaha announced the launch of the Nebraska Advanced Biomedical Innovation and Discovery Institute, a new partnership that should help put new innovations on the market and help spin out startup businesses [UNMC, January 9, 2015, http://app1.unmc.edu/PublicAffairs/TodaySite/sitefiles/today_full_print.cfm?match=16298].

On the other hand, the Biosciences sector has seen some employment growth during the 2001–2014 period, but appears to have lost some employment due to competitiveness factors, and has seen its location quotients drop between 2001 and 2014. When the Biosciences cluster was specialized in Nebraska, with a LQ of 1.21 for 2008, Battelle made a case for this cluster as a current strength in its targeting analysis. It might seem appropriate to drop Health Services as a targeted industry group in Nebraska and move some of the industries from that cluster that have a stronger claim to being primary industries to the Biosciences cluster. This would include

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moving some NAICS industries currently included in the Health Services cluster to the Biosciences cluster.

This highlights one of the difficulties with defining industry clusters by industry category—some industry definitions contain businesses that potentially belong in more than one cluster. In this case, the primary activity at the Buffett Cancer Center would most likely continue its classification as a hospital, even though the location will have a heavy research orientation. If the Health Services cluster was dropped and hospitals were rolled into Biosciences, this would result in all hospitals being part of biosciences, which would create a tendency for biosciences in Nebraska to look like it was not specialized in Nebraska. Unfortunately, there is not a feasible way to define industry clusters location by location. There is likely to be a similar problem with University partnerships. The coding of industries will tend to classify government and educational institutions in those categories, rather than in industries that define biosciences. However, it is very likely that the businesses spun out of these facilities and partnerships will be classified in the Biosciences cluster, as the startup businesses are organized. Due to these difficulties, it seems best to retain the current clusters and their definitions at this time.

This does not mean that all of the clusters identified by Battelle deserve to have an equal weight in a targeted industry plan. Should policymakers decide to target particular industries for recruitment or retention, or decide to provide additional incentives to further a desired economic development outcome, differential weights could be identified and applied to the clusters identified in the Battelle report and reviewed in this report. These weights could be used in a qualification test, where a scoring rule is developed for determining qualification or level of assistance in an economic development incentive plan.

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Appendix: Primary Industry Cluster Defined by Industry

NAICS Code	NAICS Title/Description
Cluster:	**Agricultural Machinery**
33311	Agricultural Implement Manufacturing
333241/294	Food Product Machinery Manufacturing
423820	Farm and Garden Machinery and Equipment Merchant Wholesalers
Cluster:	**Agriculture & Food Processing**
111	Crop Production
112	Animal Production
1151	Support Activities for Crop Production
1152	Support Activities for Animal Production
3222	Converted Paper Product Manufacturing
4245	Farm Product Raw Material Merchant Wholesalers
32611	Plastics Packaging Materials and Unlamented Film and Sheet Manufacturing
32616	Plastics Bottle Manufacturing
33243	Metal Can Box and Other Metal Container (Light Gauge) Manufacturing
42441	General Line Grocery Merchant Wholesalers
42491	Farm Supplies Merchant Wholesalers
311111	Dog and Cat Food Manufacturing
311119	Other Animal Food Manufacturing
311211	Flour Milling
311212	Rice Milling
311213	Malt Manufacturing
311225	Fats and Oils Refining and Blending
311230	Breakfast Cereal Manufacturing
311311	Sugarcane Mills
311312	Cane Sugar Refining
311313	Beet Sugar Manufacturing
311320	Chocolate and Confectionery Manufacturing from Cacao Beans
311330	Confectionery Manufacturing from Purchased Chocolate
311340	Nonchocolate Confectionery Manufacturing
311411	Frozen Fruit Juice & Vegetable Manufacturing
311412	Frozen Specialty Food Manufacturing
311421	Fruit and Vegetable Canning
311422	Specialty Canning
311423	Dried and Dehydrated Food Manufacturing
311511	Fluid Milk Manufacturing
311512	Creamery Butter Manufacturing
311513	Cheese Manufacturing
311514	Dry Condensed and Evaporated Dairy Product Manufacturing
311520	Ice Cream and Frozen Dessert Manufacturing

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311611	Animal (except Poultry) Slaughtering
311612	Meat Processed from Carcasses
311613	Rendering and Meat Byproduct Processing
311615	Poultry Processing
311711	Seafood Canning
311712	Fresh and Frozen Seafood Processing
311811	Retail Bakeries
311812	Commercial Bakeries
311813	Frozen Cakes Pies and Other Pastries Manufacturing
311821	Cookie and Cracker Manufacturing
311822	Flour Mixes and Dough Manufacturing from Purchased Flour
311823	Dry Pasta Manufacturing
311830	Tortilla Manufacturing
311911	Roasted Nuts and Peanut Butter Manufacturing
311919	Other Snack Food Manufacturing
311920	Coffee and Tea Manufacturing
311930	Flavoring Syrup and Concentrate Manufacturing
311941	Mayonnaise Dressing and Other Prepared Sauce Manufacturing
311942	Spice and Extract Manufacturing
311991	Perishable Prepared Food Manufacturing
311999	All Other Miscellaneous Food Manufacturing
326199	All Other Plastics Product Manufacturing
327213	Glass Container Manufacturing
333993	Packaging Machinery Manufacturing
541940	Veterinary Services

Cluster:	**Biosciences**
311221	Wet Corn Milling
311222	Soybean Processing
311223	Other Oilseed Processing
325193	**Ethyl Alcohol Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325221	Cellulosic Organic Fiber Manufacturing
325311	Nitrogenous Fertilizer Manufacturing
325312	Phosphatic Fertilizer Manufacturing
325314	Fertilizer (Mixing Only) Manufacturing
325320	Pesticide and Other Agricultural Chemical Manufacturing
325411	Medicinal and Botanical Manufacturing
325412	Pharmaceutical Preparation Manufacturing
325413	In Vitro Diagnostic Substance Manufacturing
325414	Biological Product (except Diagnostic) Manufacturing
334510	Electromedical and Electrotherapeutic Apparatus Manufacturing
334516	Analytical Laboratory Instrument Manufacturing
334517	Irradiation Apparatus Manufacturing

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339112	Surgical and Medical Instrument Manufacturing
339113	Surgical Appliance and Supplies Manufacturing
339114	Dental Equipment and Supplies Manufacturing
339115	Ophthalmic Goods Manufacturing
339116	Dental Laboratories
541380	*Testing Laboratories
541711	Research and Development in Biotechnology
621511	Medical Laboratories
621512	Diagnostic Imaging Centers

Cluster:	**Business Management & Administrative Services**
5418	Advertising Public Relations and Related Services
55111	Management of Companies and Enterprises
56141	Document Preparation Services
56142	Telephone Call Centers
56143	Business Service Centers
56144	Collection Agencies
56145	Credit Bureaus
56149	Other Business Support Services
511140	Directory and Mailing List Publishers
541110	Offices of Lawyers
541120	Offices of Notaries
541191	Title Abstract and Settlement Offices
541199	All Other Legal Services
541430	Graphic Design Services
541613	Marketing Consulting Services
541910	Marketing Research and Public Opinion Polling
561110	Office Administrative Services
561210	Facilities Support Services

Cluster:	**Financial Services**
521110	Monetary Authorities Central Bank
522110	Commercial Banking
522120	Savings Institutions
522130	Credit Unions
522190	Other Depository Credit Intermediation
522210	Credit Card Issuing
522220	Sales Financing
522291	Consumer Lending
522292	Real Estate Credit
522293	International Trade Financing
522294	Secondary Market Financing
522298	All Other Nondepository Credit Intermediation
522310	Mortgage and Nonmortgage Loan Brokers

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522320	Financial Transactions Processing Reserve & Clearinghouse Activities
522390	Other Activities Related to Credit Intermediation
523110	Investment Banking and Securities Dealing
523120	Securities Brokerage
523130	Commodity Contracts Dealing
523140	Commodity Contracts Brokerage+B112
523210	Securities and Commodity Exchanges
523910	Miscellaneous Intermediation
523920	Portfolio Management
523930	Investment Advice
523991	Trust Fiduciary and Custody Activities
523999	Miscellaneous Financial Investment Activities
524113	Direct Life Insurance Carriers
524114	Direct Health and Medical Insurance Carriers
524126	Direct Property and Casualty Insurance Carriers
524127	Direct Title Insurance Carriers
524128	Other Direct Insurance (except Life Health and Medical) Carriers
524130	Reinsurance Carriers
524210	Insurance Agencies and Brokerages
524291	Claims Adjusting
524292	Third Party Administration of Insurance and Pension Funds
524298	All Other Insurance Related Activities
525110	Pension Funds
525120	Health and Welfare Funds
525190	Other Insurance Funds
525910	Open-End Investment Funds
525920	Trusts Estates and Agency Accounts
525990	Other Financial Vehicles

Cluster:	**Health Services**
621410	Family Planning Centers
621420	Outpatient Mental Health and Substance Abuse Centers
621491	HMO Medical Centers
621492	Kidney Dialysis Centers
621493	Freestanding Ambulatory Surgical and Emergency Centers
621498	All Other Outpatient Care Centers
621610	Home Health Care Services
621910	Ambulance Services
621991	Blood and Organ Banks
621999	All Other Miscellaneous Ambulatory Health Care Services
622110	General Medical and Surgical Hospitals
622210	Psychiatric and Substance Abuse Hospitals
622310	Specialty (except Psychiatric and Substance Abuse) Hospitals
623110	Nursing Care Facilities

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623210	Residential Mental Retardation Facilities
623220	Residential Mental Health and Substance Abuse Facilities

Cluster:	**Hospitality & Tourism**
487110	Scenic and Sightseeing Transportation Land
487210	Scenic and Sightseeing Transportation Water
487990	Scenic and Sightseeing Transportation Other
561510	Travel Agencies
561520	Tour Operators
561591	Convention and Visitors Bureaus
561599	All Other Travel Arrangement and Reservation Services
561920	Convention and Trade Show Organizers
712110	Museums
712120	Historical Sites
712130	Zoos and Botanical Gardens
712190	Nature Parks and Other Similar Institutions
713110	Amusement and Theme Parks
713120	Amusement Arcades
713210	Casinos (except Casino Hotels)
713290	Other Gambling Industries
713910	Golf Courses and Country Clubs
721110	Hotels (except Casino Hotels) and Motels
721120	Casino Hotels
721191	Bed and Breakfast Inns
721199	All Other Traveler Accommodation

Cluster:	**Precision Metals Manufacturing**
3323	Architectural and Structural Metals Manufacturing
3327	Machine Shops; Turned Product; and Screw Nut & Bolt Mnfg
3328	Coating, Engraving, Heat Treating
3329	Other Fabricated Metal Product Manufacturing
3335	Metalworking Machinery Manufacturing
3362	Motor Vehicle Body and Trailer Manufacturing
3363	Motor Vehicle Parts Manufacturing
3369	Other Transportation Equipment Manufacturing

Cluster:	**Research Development & Engineering Services**
541330	Engineering Services
541380	Testing Laboratories *
541710	Research and Development in the Physical, Engineering, and Life Sciences *
541712	*Research & Development in the Physical Engineering & Life Sciences (exc Biotech)

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Cluster:	Software & Computer Services
511210	Software Publishers
518210	Data Processing, Hosting, & Related Services
541511	Custom Computer Programming Services
541512	Computer Systems Design Services
541513	Computer Facilities Management Services
541519	Other Computer Related Services

Cluster:	Transportation Warehousing and Distribution Logistics
33392	Material Handling Equipment Manufacturing
481111	Scheduled Passenger Air Transportation
481112	Scheduled Freight Air Transportation
481211	Nonscheduled Chartered Passenger Air Transportation
481212	Nonscheduled Chartered Freight Air Transportation
481219	Other Nonscheduled Air Transportation
482111	Line-Haul Railroads
482112	Short Line Railroads
483111	Deep Sea Freight Transportation
483112	Deep Sea Passenger Transportation
483113	Coastal and Great Lakes Freight Transportation
483114	Coastal and Great Lakes Passenger Transportation
483211	Inland Water Freight Transportation
483212	Inland Water Passenger Transportation
484110	General Freight Trucking Local
484121	General Freight Trucking Long Distance Truckload
484122	General Freight Trucking Long Distance Less than Truckload
484220	Specialized Freight (except Used Goods) Trucking Local
484230	Specialized Freight (except Used Goods) Trucking Long Distance
488111	Air Traffic Control
488119	Other Airport Operations
488190	Other Support Activities for Air Transportation
488210	Support Activities for Rail Transportation
488310	Port and Harbor Operations
488320	Marine Cargo Handling
488330	Navigational Services to Shipping
488390	Other Support Activities for Water Transportation
488490	Other Support Activities for Road Transportation
488510	Freight Transportation Arrangement
488991	Packing and Crating
488999	All Other Support Activities for Transportation
492110	Couriers and Express Delivery Services
493110	General Warehousing and Storage
493120	Refrigerated Warehousing and Storage
493130	Farm Product Warehousing and Storage

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493190	Other Warehousing and Storage

Cluster:	**Renewable Energy**
325193	Ethyl Alcohol Manufacturing

Appendix B.1: 2015 Battelle Report (Review of Nebraska's Innovation Drivers)

August 8, 2015

Review of Nebraska's Innovation Drivers

The 2010 Battelle report addressed the question of how well Nebraska performs in measures of innovation and entrepreneurial development. Over time, an economy must remain competitive to be successful. Innovation is the "means—perhaps the only means—by which a high-skill, high-wage economy can successfully compete with high-skill, lower-wage economies without reducing its standard of living" [NGA, Innovate America: Final Report, 2007, p.1].
A set of measures was developed by Battelle to determine if Nebraska has the presence of innovation activities needed to support overall innovation and entrepreneurial development. These included measures of talent, entrepreneurial activity, risk capital, research and development, and intellectual property generation and technology transfer.
The Nebraska Department of Economic Development's (NDED) Research Division reviewed and updated Battelle's 2010 report using its own data. NDED is not able to reproduce and extend all of Battelle's innovation measures primarily due to Battelle's use of proprietary data; however, many of these measures exist in other formats. Where it is possible, this report uses Battelle's methods and measures, if not the same data sources.

Measuring Innovation in Nebraska

In this report, the Research Division reviews and updates, where possible, Battelle's assessment of Nebraska's preparedness for an innovation-driven economy. Battelle identified a broad set of measures to determine a state's readiness to develop a successful, innovation-based economy that can remain competitive. These measures involve talent, as measured by academic performance in science and engineering; entrepreneurial activity, measured by business establishment, employment and revenue growth; the availability of risk capital, measured by venture capital and Small Business Innovation Grant awards; research and development, measured by R&D expenditures in academic and industry settings; and intellectual property generation and technology transfer, measured by the number of patents granted and university technology transfers. Where possible, the Research Division reviewed and updated Battelle's

innovation-related measures, and when this was not possible, alternative measures were identified.

The 2010 Battelle report identified a group of benchmark states selected to provide geographic balance, peer states, and states identified by NDED to be more advanced in developing an innovation-based economy. Battelle avoided states with large populations and major cities. Battelle identified seven benchmark states: Iowa, Kansas (neighboring states), Oklahoma and Tennessee (identified as peer states in moving toward an innovation-driven economy), Virginia, Utah, and Wisconsin (states viewed as more advanced in innovation).

To these states, one additional state, Minnesota, was added based on Minnesota's proximity to Nebraska in a number of state rankings. The original seven benchmark states are compared to Nebraska using updated data. This allows for comparison to the previous benchmark states. A new set of five benchmark states is proposed, along much the same lines: Iowa, Utah, Wisconsin, Minnesota, and Wisconsin. The body of the report contains comparison data for both the original Battelle benchmark states, and the proposed five benchmark states, for a total of eight potential benchmark states.

Innovation Potential Measured as Skilled Talent

Battelle's first measure of Nebraska's preparedness to develop an innovation-driven economy is based on the educational achievements of Nebraska residents. Educational achievement was measured in terms of science and engineering degrees and college graduation rates. The 2010 Battelle report concluded that Nebraska's performance in this measure was mixed, and described it as "generally slightly below the national average—in the type of high-skilled talent needed to fuel innovation in today's knowledge-based economy" [Battelle, 2010, p. 20].

The first measure, science and engineering degrees as a share of all higher education degrees, is presented in Table 6a. Nebraska's percentage of these degrees as a share of all higher education degrees, increased from 22.8% in 2001 to 24.1% in 2011, the last year data is available. Nebraska's score on this measure is below the national percentage; however, the measurement was taken at a time when the national share of science and engineering degrees was falling. Nebraska's ranking among the 50 states improved over this time period from 48th to 42nd. Compared to the benchmark states, Nebraska was lagging behind all in 2001, but had caught Kansas and Tennessee by 2011.

Table 6a. Key Indicators: Talent/Science and Engineering Education, Percent of Higher Education Degrees

State	Science & Engineering Degrees as Percentage of Higher Education Degrees				State Rank of Science & Engineering Degrees as Percentage of Higher Education Degrees			
	2001	2007	2008	2011	2001	2007	2008	2011
United States	**29.6%**	**28.9%**	**28.9%**	**29.3%**				
Nebraska	**22.8%**	**23.6%**	**24.0%**	**24.1%**	**48**	**44**	**43**	**42**
Iowa	28.1%	27.4%	27.0%	28.3%	28	29	31	27

Kansas	27.4%	25.1%	24.8%	23.2%	30	41	39	46
Minnesota	28.7%	26.1%	26.5%	27.6%	25	33	32	30
Oklahoma	27.3%	25.2%	24.3%	24.7%	31	40	40	41
Tennessee	24.6%	23.8%	24.3%	23.6%	43	43	40	43
Utah	29.2%	32.3%	30.9%	29.4%	23	12	18	22
Virginia	35.3%	33.9%	34.0%	32.8%	6	6	6	12
Wisconsin	28.7%	30.2%	29.6%	29.9%	25	19	20	19

Note: Higher education degrees include bachelor's, master's, and doctorate levels. Science degrees include physical, computer, agricultural, biological, earth, atmospheric, ocean, and social sciences; psychology; and mathematics.
Source: National Science Foundation, National Center for Education Statistics, Integrated Postsecondary Education Data System database, various years.

Comparing 2001 and 2011 data, only three of the other benchmark states—Iowa, Utah, and Wisconsin—joined Nebraska in moving against the national trend of a shrinking percentage of science and engineering degrees as a percentage of all higher education degrees.

The second measure of educational achievement is science and engineering doctorate degrees as a share of science and engineering degrees. This data, summarized in Table 6b, is similar to the percentage of science and engineering degrees as a share of all higher education degrees discussed above. The national trend between 2001 and 2011 is slightly downward, while Nebraska, ranking below the national figures, increased its share during this time. In 2001 4.9% of science and engineering degrees conferred nationally were doctorate degrees, and it was 4.0% in Nebraska. By 2011, the national rate had dropped to 4.4%, and Nebraska's had risen to 4.4%. Nebraska's ranking among the 50 states in this measure of educational achievement rose from 31st to 19th during the 2001 to 2011 time period.

In terms of benchmark states, Nebraska was ahead of only Oklahoma and Utah in terms of the percentage of doctorate degrees awarded in science and engineering compared to all science and engineering degrees. By 2011, Nebraska scored better than four benchmark states—Iowa, Oklahoma, Utah, and Virginia—in this measure.

Nebraska and four other benchmark states improved the percentage of science and engineering doctorate degrees as a percentage of all science and engineering degrees conferred between 2001 and 2011. These included Kansas, Oklahoma, Tennessee, and Utah.

In 2001, Nebraska colleges and universities conferred 3,261 science and engineering degrees. This ranked Nebraska 34th in the nation in terms of the number of degrees conferred in these fields, but a measure of the number of degree completions per capita, better accounts for population differences in the comparison.

Table 6b. Key Indicators: Talent/Science and Engineering Education Doctorate Degrees

State	**Science & Engineering Doctorate Degrees as Percentage of Science & Engineering Degrees**				**State Rank Science & Engineering Doctorate Degrees as Percentage of Science & Engineering Degrees**			
	2001	**2007**	**2008**	**2011**	**2001**	**2007**	**2008**	**2011**
United States	**4.9%**	**5.1%**	**5.1%**	**4.6%**	**N/A**	**N/A**	**N/A**	**N/A**

Nebraska	**4.0%**	**4.2%**	**3.9%**	**4.4%**	**31**	**32**	**39**	**26**
Iowa	5.0%	5.3%	5.1%	3.3%	14	13	15	42
Kansas	4.2%	4.1%	4.1%	5.0%	28	36	33	11
Minnesota	5.7%	6.1%	5.5%	5.3%	8	3	11	4
Oklahoma	3.3%	4.0%	3.4%	3.7%	40	37	44	34
Tennessee	4.5%	4.8%	4.9%	4.7%	24	22	19	17
Utah	3.2%	3.3%	3.5%	3.7%	42	42	43	34
Virginia	4.2%	4.3%	4.4%	4.2%	28	29	28	29
Wisconsin	4.7%	4.8%	5.3%	4.5%	18	22	12	24

Note: Higher education degrees include bachelor's, master's, and doctorate levels. Science degrees include physical, computer, agricultural, biological, earth, atmospheric, ocean, and social sciences; psychology; and mathematics.
Source: National Science Foundation, National Center for Education Statistics, Integrated Postsecondary Education Data System database, various years.

Table 6c presents the number of science and engineering degrees awarded by state per 100,000 persons living in the state. According to this measure, Nebraska was producing more science and engineering graduates per 100,000 population than the nation as a whole, in each of the years presented. Nebraska's

Table 6c. Key Indicators: Talent/Science and Engineering Degrees Conferred Annually per Capita

State	Science & Engineering Degrees Conferred Annually per 100,000 Population				State Rank Science & Engineering Degrees Conferred Annually per 100,000 Population			
	2001	**2007**	**2008**	**2011**	**2001**	**2007**	**2008**	**2011**
United States	**182.6**	**210.3**	**214.0**	**235.3**	**N/A**	**N/A**	**N/A**	**N/A**
Nebraska	**192.8**	**216.0**	**225.2**	**243.1**	**20**	**23**	**21**	**19**
Iowa	217.9	253.7	272.5	433.8	14	11	9	3
Kansas	206.4	211.1	210.7	209.5	16	26	26	30
Minnesota	187.0	240.7	255.0	296.4	21	16	11	10
Oklahoma	170.6	171.6	166.2	171.7	30	38	37	40
Tennessee	135.4	143.8	146.4	160.1	41	46	46	45
Utah	269.3	322.1	308.8	333.9	4	4	4	5
Virginia	219.8	241.2	251.1	291.9	12	15	15	12
Wisconsin	195.1	228.4	225.7	241.1	19	18	20	22

Note: Higher education degrees include bachelor's, master's, and doctorate levels. Science degrees include physical, computer, agricultural, biological, earth, atmospheric, ocean, and social sciences; psychology; and mathematics.
Source: National Science Foundation, National Center for Education Statistics, Integrated Postsecondary Education Data System database, various years.

rank among the 50 states remained relatively constant in the years presented, increasing from 20th to 19th between 2001 and 2011. Iowa, Kansas, Utah, Virginia, and Wisconsin, among the

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benchmark states, produced more science and engineering degrees per capita than Nebraska in 2001. By 2011, Nebraska surpassed Wisconsin on the list.

In terms of science and engineering doctorates awarded in Nebraska per 100,000 population, Nebraska's share rose from 7.6 per 100,000 in 2001 to 10.6 in 2011, the last year data is available. This compares to 8.9 science and engineering doctorates awarded per 100,000 in the US as a whole in 2001, and 10.9 in 2011. This measure is another where Nebraska lags the nation throughout the 2001 to 2011 time period, but has made progress in the national rankings. In terms of state ranking, Nebraska moved from ranking 26th among the 30 states in 2001, to 18th in 2011.

Table 6d. Key Indicators: Talent/Science and Engineering Doctorate Degrees per Capita

State	Science & Engineering Doctorate Degrees Conferred Annually per 100,000 Population				State Rank Science & Engineering Doctorate Degrees Conferred Annually per 100,000 Population			
	2001	2007	2008	2011	2001	2007	2008	2011
United States	8.9	10.8	10.9	10.9	**N/A**	**N/A**	**N/A**	**N/A**
Nebraska	**7.6**	**9.1**	**8.9**	**10.6**	**26**	**25**	**25**	**18**
Iowa	11.0	13.4	14.0	14.4	9	7	7	5
Kansas	8.7	8.7	8.5	10.5	19	29	30	19
Minnesota	10.7	14.8	14.1	15.8	11	4	5	4
Oklahoma	5.7	6.9	5.7	6.3	38	38	43	43
Tennessee	6.1	6.9	7.2	7.6	36	38	38	35
Utah	8.6	10.5	10.8	12.4	21	18	20	13
Virginia	9.3	10.4	11.1	12.1	14	19	18	14
Wisconsin	9.1	11.0	11.9	10.8	16	16	13	17

Note: Higher education degrees include bachelor's, master's, and doctorate levels. Science degrees include physical, computer, agricultural, biological, earth, atmospheric, ocean, and social sciences; psychology; and mathematics.

Source: National Science Foundation, National Center for Education Statistics, Integrated Postsecondary Education Data System database, various years.

In terms of science and engineering doctorate degrees per capita, all benchmark states improved in the number of these degree awards per capita between 2001 and 2011. In 2001, Nebraska lagged all benchmark states but Oklahoma and Tennessee in this measure, and by 2011 Nebraska had passed Kansas and remained higher than Oklahoma and Tennessee in terms of doctorate degrees awarded in science and engineering fields.

A final measure of educational achievement used by Battelle is the percentage of a state's population with a bachelor's degree or higher. Table 6e presents 5-year data from the US Census' American Community Survey (ACS), and shows both the percentage of the population with at least a bachelor's degree and the state rank, where 1 is the state with the highest percent and 50 is the state with the lowest. The 5-year data were selected because relatively small annual sample sizes in the ACS could cause inconsistent results. In addition, because the starting year for ACS data is 2005 and not 2001, we would not have been able to present data

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consistent with the time periods chosen for the other measures. Given this, the Research Division chose to present the data with the smallest sampling error.

Once again, Nebraska appears to be behind the national figures, but is closer to the national level at the end of the study period. The percentage of Nebraska residents with at least a bachelor's degree was 27.1% for the period ending in 2009, compared with 27.5% of the US population during the same period. By 2013, that percentage had risen to 28.5% for Nebraska and 28.8% nationally. In terms of 50-state rankings, Nebraska's rank fell from 20th to 21st during this time period.

Table 6e. Key Indicators: Talent/Science and Engineering Education, Population with a Bachelors' Degree or Higher.

State	Population Ages 25 and over with a Bachelor's Degree or Higher		State Rank, Population Ages 25 and over with a Bachelor's Degree or Higher	
	2009	2013	2009	2013
United States	**27.5%**	**28.8%**	**N/A**	**N/A**
Nebraska	**27.1%**	**28.5%**	**20**	**21**
Iowa	24.2%	25.7%	36	36
Kansas	28.8%	30.3%	16	15
Minnesota	31.2%	32.6%	10	10
Oklahoma	22.4%	23.5%	41	42
Tennessee	22.4%	23.8%	41	41
Utah	28.7%	30.3%	17	15
Virginia	33.4%	35.2%	6	6
Wisconsin	25.5%	26.8%	30	29

Source: US Census, American Community Survey, NDED calculations.

All benchmark states increased the proportion of residents with at least a bachelor's degree. Nebraska's percentage was higher than four of the benchmark states in 2009 and remained higher than those four—Iowa, Oklahoma, Tennessee, and Wisconsin—in the 2013 data.

Based on the above review, we conclude that Nebraska's performance in measures of educational attainment is mixed. Battelle's description of Nebraska performance as generally slightly below the national average remains true based on the available data. However, in nearly every measure, Nebraska's performance has improved, and moved closer to the national average. In addition, Nebraska's performance in education measures has generally been better than those of the benchmark states taken as a whole. That is, during the challenges of the Great Recession, Nebraska was able to improve on its educational attainments compared to some of the benchmark states.

Innovation Potential Measured as Entrepreneurial Activity

Battelle's next measure of Nebraska's preparedness to develop an innovation-driven economy is based on entrepreneurial activity in Nebraska. Entrepreneurial activity was measured in terms of the growth in new business establishments, job creation from new business establishments, and *Inc.* magazine's listing of the fastest growing US businesses. The 2010

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Battelle report concluded that "[i]n measures of entrepreneurial activity, Nebraska seems to be lagging the nation and benchmark states" [Battelle, 2010, p. 21].

Table 7a presents the average annual growth rate in business establishments for the US, Nebraska, and the benchmark states. The table covers three time periods, 2001-2007, 2008-2012, and the entire 2001-2012. Based on the US Census of Business Dynamics, over the 2001 to 2012 period (the latest years available), Nebraska grew its new business establishments by 9.8%, on average, each year compared with 11.2% for the nation. Nebraska's rate of new business formation was behind other benchmark states, except for Iowa and Wisconsin, during this period.

Breaking the data in to pre-2008 and post-2008 periods, in Table 7a, the relative performance of Nebraska in business establishment growth is similar to the experience of the other benchmark states. Most benchmark states' average annual business establishment growth was about 2 percentage points lower since the start of the Great Recession. The exception is Utah, which lost nearly four percentage points in growth, from 16.0% to 12.3%, between the pre-Great Recession and Great Recession to current time periods. Nebraska's establishment growth rate was higher than only two of the benchmark states in the 2001–2007 period, and was higher than three benchmark stares in the 2008–2012 period.

Table 7a. Key Indicators: Entrepreneurial Activity, Business Establishment Growth

State	Average Annual Growth in New Business Establishments		
	2001–2007	2008–2012	2001–2012
United States	**11.2%**	**9.9%**	**11.2%**
Nebraska	**10.6%**	**8.7%**	**9.8%**
Iowa	10.1%	8.1%	9.2%
Kansas	11.0%	8.6%	10.0%
Minnesota	11.5%	9.1%	10.5%
Oklahoma	11.6%	9.5%	10.7%
Tennessee	11.4%	9.1%	10.5%
Utah	16.0%	12.3%	14.5%
Virginia	12.1%	9.7%	11.1%
Wisconsin	10.2%	8.0%	3.4%

Source: US Census Business Dynamics Statistics, Longitudinal Business Database 1977–2012.

The job creation rate from these new business establishments averaged 4.7% in Nebraska from 2001 through 2012, compared with 5.5% for the nation (Table 7b). Among the benchmark states, Nebraska outperformed Iowa and Wisconsin, but was well behind Utah and Oklahoma, in terms of job creation due to new business establishments.

Breaking the data into pre-2008 and post-2008 periods, in Table 7b, the pattern is similar to that of establishment growth, in that job growth was faster in the earlier period than in the later period. The average annual job creation rate between 2001 and 2007 was 5.3% for Nebraska, which was lower than all of the benchmark states except Iowa and Wisconsin. In the

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later period, Nebraska's growth rate from new business establishments was 3.9%. This rate was tied with Minnesota, among the benchmark states, but lower than all but Iowa and Wisconsin.

Table 7b. Key Indicators: Entrepreneurial Activity, Job Creation from New Business Establishments

State	Job Creation Rate from New Business Establishments		
	2001–2007	2008–2012	2001–2012
United States	**6.2%**	**4.7%**	**5.5%**
Nebraska	**5.3%**	**3.9%**	**4.7%**
Iowa	4.7%	3.5%	4.2%
Kansas	5.8%	4.3%	5.2%
Minnesota	5.5%	3.9%	4.8%
Oklahoma	6.3%	4.9%	5.7%
Tennessee	5.8%	4.3%	5.2%
Utah	7.3%	5.2%	6.4%
Virginia	6.1%	4.7%	5.5%
Wisconsin	4.9%	3.4%	4.3%

Source: US Census Business Dynamics Statistics, Longitudinal Business Database 1977–2012.

In 1982, *Inc.* magazine began publishing a list of the fastest-growing companies in the US. In 2007 the list was expanded from 500 to 5,000. The list features 5,000 private US-based companies with the highest revenue growth during the previous four-year period. In order to qualify for the list, a business must be privately held, for-profit, and operating as of the first week of January in the first of the four calendar years measured. Nebraska had 28 companies that were included in the *Inc*. 5,000 list for both 2007 and 2014 (Table 7c).

Among the benchmark states, Nebraska had the fewest number of *Inc*. 5,000 businesses. However, Nebraska also has the smallest population of these states. Taking population into account, Nebraska had 1.57 firms per 100,000 population, in 2007, and 1.49 in 2014. This compares with 1.66 and 1.57 per 100,000 for the US in 2007 and 2014, respectively. Compared to the benchmark states in the 2010 Battelle list, Nebraska was behind all states except Iowa, Oklahoma, and Tennessee. Nebraska ranking among the benchmark states improved on the 2014 list. Only three of the benchmark states, Minnesota, Utah, and Virginia, scored better than Nebraska when the 2014 list is adjusted for state population. While Nebraska's number of *Inc*. 5,000 firms per 100,000 persons decreased between the 2007 and 2014 lists, only two of the benchmark states improved their score, Utah and Virginia.

Table 7c. Table Key Indicators: Entrepreneurial Activity, Revenue Growth

State	*Inc*. 5,000 Firms 2007	*Inc*. 5,000 Firms 2014	*Inc*. 5,000 Firms 2007 per 100,000 population	*Inc*. 5,000 Firms 2014 per 100,000 population	State Rank 2001 per 100,000	State Rank 2014 per 100,000

United States			**1.66**	**1.57**	**N/A**	**N/A**
Nebraska	**28**	**28**	**1.57**	**1.49**	**21**	**21**
Iowa	35	30	1.17	0.97	34	35
Kansas	40	36	1.44	1.24	27	26
Minnesota	115	94	2.21	1.72	10	11
Oklahoma	46	30	1.27	0.77	33	38
Tennessee	87	80	1.41	1.22	28	27
Utah	71	86	2.73	2.92	4	2
Virginia	232	284	2.99	3.41	2	1
Wisconsin	119	70	2.12	1.22	11	28

Notes: To qualify for the Inc. 5,000 list, companies are required to be US-based, privately held, for profit, and independent (not subsidiaries or divisions of other companies). The ranking is based on percentage revenue growth over the last four calendar years. The company must have been founded by, and generating revenue in the first week of the year so that four full years of revenue are available.
Source: *Inc.*; US Census; NDED calculations.

Once again, using measures similar to those employed by 2010 Battelle study to measure entrepreneurial activity, the Battelle report's original conclusions about Nebraska remain valid. Nebraska appears to be lagging somewhat behind the nation and the benchmark states in terms of entrepreneurial activity. However, Nebraska has improved somewhat compared to the benchmark states.

Innovation Potential Measured as Risk Capital

Battelle's third measure of Nebraska's preparedness to develop an innovation-driven economy is based on risk capital available for financing emerging businesses. The availability of risk capital is measured in terms of venture capital invested in the state, and Small Business Innovation Research (SBIR) grants awarded to entrepreneurs in the states. In these measures, the 2010 Battelle report concluded that "Nebraska has little in the way of venture financing for emerging firms" [Battelle, 2010, p. 21].

The State Science and Technology Institute (SSTI) publishes annual data from a survey conducted by the National Venture Capital Association and PricewaterhouseCoopers. This information is broken down by state and is reported in terms of the number of dollars invested and the number of venture capital deals. The data from 2009 to 2014 show that over 50% of the venture capital investment in the US occurs in just two states, California and Massachusetts, and those two states received more than 65% of the capital and nearly 51% of the deals in 2014.

Given that, it appears difficult that any relatively small state in the interior of the country would receive much venture capital. However, looking at the amount of venture capital on a per capita basis provides more insight on the relative share of venture capital among the benchmark states. For example, the amount of venture capital investment per capita for the US as a whole is $575.01 for the 2009-2014 period. This compares to Massachusetts, the 2nd ranked state in terms of total dollars invested, but 1st in terms of dollars invested per capita,

with nearly $2,873 per resident, and California, 1st in terms of dollars invested but 2nd, at $2,485, in terms of investment per capita.

Nebraska has the smallest amount of venture capital of the benchmark states at $67.2 million, ranking 41st among all states (Table 8a). In terms of deals, Nebraska's 36 deals between 2009 and 2014 were higher than those in Iowa and Oklahoma among the benchmark states, and ranked 35th among all states during that period. On a per capita basis, Nebraska received $36.47 million in venture capital investment during the 2009-2014 period. This ranked 30th among the states, and was lower than any of the benchmark states except Oklahoma (Table 8b). Finally, in venture capital measured as the number of venture capital deals per million population, Nebraska ranked 30th among all states, with 19.5 projects per million persons. Among the benchmark states, this was greater than Iowa, Oklahoma, and Wisconsin.

Table 8a. Key Indicators: Risk Capital, Venture Capital Invested, and Venture Capital Deals, Cumulative Data 2009–2014

State	Total Cumulative Venture Capital Invested ($ Millions)	State Rank, Total Cumulative Venture Capital Invested	Total Cumulative Venture Capital Deals	State Rank, Total Cumulative Venture Capital Deals
United States	**$179,241.5**	**N/A**	**23,167**	**N/A**
Nebraska	**$67.2**	**41**	**36**	**35**
Iowa	$225.8	30	27	39
Kansas	$238.4	29	132	23
Minnesota	$1,593.8	16	218	20
Oklahoma	$99.4	39	32	38
Tennessee	$600.7	23	281	16
Utah	$1,981.7	14	232	19
Virginia	$2,654.1	10	406	10
Wisconsin	$446.7	26	110	25

Source: National Venture Capital Association/PricewaterhouseCoopers; State Science and Technology Institute.

In terms of Small Business Innovation Research (SBIR) grants awarded to Nebraska businesses, Battelle used the number of grants as a measure of risk capital within their measures of innovation. This is a highly competitive program that encourages domestic small businesses to engage in federal research and development that has the potential for commercialization. "By including qualified small businesses in the nation's R&D arena, high-tech innovation is stimulated and the United States gains entrepreneurial spirit as it meets its specific research and development needs" [US Small Business Administration, https://www.sbir.gov/about/about-sbir]. The size of the program is based on the budgets of 12 federal agencies with R&D budgets.

Because the size of the budget changes from year to year, the number of dollars over time is not a particularly good measure of performance. Furthermore, since the awards can be linked

to some extent to the size of their budgets, the number of grants per state may not be the best measure for comparing states to each other or over time. In an attempt to overcome these difficulties, the Research Division developed an index designed to compare each state's proportion of available grants awarded to each state's proportion of the US population. This score is multiplied by 100, with a score of 100 meaning that the state's entrepreneurs received SBIR grants in the same proportion as their state's share of the population. States with more successful small entrepreneurs per capita have an index greater than 100.

Table 8b. Key Indicators: Risk Capital, Venture Capital Invested, and Venture Capital Deals per Million Population, Cumulative Data 2009–2014

State	Total Cumulative Venture Capital Invested per Million Population	State Rank, Total Cumulative Venture Capital Invested per Million Population	Total Cumulative Venture Capital Deals per Million Population	State Rank, Total Cumulative Venture Capital Deals per Million Population
United States	**$575.01**	**N/A**	**74.3**	**N/A**
Nebraska	**$36.47**	**38**	**19.5**	**30**
Iowa	$73.68	33	8.8	42
Kansas	$83.06	30	46.0	16
Minnesota	$298.02	14	40.8	18
Oklahoma	$26.26	42	8.5	43
Tennessee	$93.88	27	43.9	17
Utah	$703.90	4	82.4	8
Virginia	$327.25	11	50.1	14
Wisconsin	$78.24	31	19.3	31

Source: National Venture Capital Association/PricewaterhouseCoopers; State Science and Technology Institute;
US Census, population estimate for 2011 used to determine per capita amounts.

SBIR statistics for benchmark states are presented in Table 8c, and the SBIR index results for benchmark state are presented in Table 8d. Nebraska had the smallest number of SBIR awards between 2001 and 2014. On a per 100,000 population basis, Nebraska was tied with Iowa for the smallest number across the entire 2001-2014 period, and tied with Iowa for the smallest number in the 2001-2007 subperiod. However, Nebraska did better on the basis of grants per 100,000 population in the later, 2008-2014 period. Nebraska tied Iowa and Kansas and had more projects per 100,000 than Tennessee in the later period.

Table 8c. Key Indicators: Small Business Innovation Research Program

State	Total Cumulative SBIR Awards	Total Average SBIR Awards, per 100,000 Population, 2001–2014		
	2001–2014	2001–2014	2001–2007	2008–2014
United States	**79,843**	**1.9**	**2.1**	**1.7**
Nebraska	**132**	**0.5**	**0.6**	**0.5**
Iowa	224	0.5	0.6	0.5
Kansas	246	0.6	0.8	0.5
Minnesota	1,102	1.5	1.7	1.3
Oklahoma	284	0.6	0.8	0.4
Tennessee	517	0.6	0.7	0.5
Utah	693	1.9	2.3	1.5
Virginia	4,829	4.4	4.8	4.1
Wisconsin	859	1.1	1.2	1.0

Source: US Small Business Administration, State Summary Reports, various years; NDED calculations.

In terms of the SBIR awards index, Nebraska had the lowest score across the entire study period, and the lowest score in the first subperiod, compared to the benchmark states. Nebraska performed better than Iowa among these states in the second subperiod. In terms of 50-state rankings, Nebraska's rank improved to 42nd from 46th between the two subperiods, is now ahead of Iowa, and ranks just below Kansas, 41st, and Tennessee, 40th. This provides some indication that Nebraska is moving in the right direction in its innovation community.

Table 8d. Key Indicators: Small Business Innovation Research Program Index

State	Index of SBIR Awards			State Rank Index of SBIR Awards		
	2001–2014	2001–2007	2008–2014	2001–2014	2001–2007	2008–2014
United States	**100.0**	**100.0**	**100.0**	**N/A**	**N/A**	**N/A**
Nebraska	**27.8**	**26.7**	**29.1**	**45**	**46**	**42**
Iowa	28.2	27.6	28.7	44	43	44
Kansas	33.2	36.4	29.6	39	38	41
Minnesota	79.9	83.1	76.2	23	22	22
Oklahoma	29.4	36.7	21.1	42	36	48
Tennessee	31.7	33.3	30.0	41	42	40
Utah	100.3	110.3	90.7	16	14	18
Virginia	234.8	230.2	240.4	5	5	5
Wisconsin	58.0	55.9	60.3	27	29	27

Source: US Small Business Administration, State Summary Reports, various years; NDED calculations.

The conclusions of the 2010 Battelle report regarding the availability of risk capital appear to remain valid. There is not a lot of venture capital finding its way to Nebraska, compared to

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either the nation as a whole or compared to the benchmark states. In terms of SBIR grants, looking at the share of awards based on population, and comparing Nebraska to the benchmark states, Nebraska inventors are becoming relatively more successful in attracting federal grant money.

Innovation Potential Measured as Research and Development Expenditures

Battelle's fourth measure of Nebraska's preparedness to develop an innovation-driven economy is based on R&D expenditures in both the academic and industrial sectors of the economy. In this area of innovation, Battelle concluded that "Nebraska performs well in academic R&D expenditures with respect to both size relative to the state's economy and growth rate, while the state's smaller-than-average industrial R&D base made strong gains during the 2001 through 2007 period" [Battelle, 2010, p. 22].

In terms of academic R&D expenditures, Nebraska's overall level of expenditure was less than every benchmark state except Oklahoma in both 2007 and 2013. In addition, Nebraska had the lowest percentage increase of the benchmark states over that period (Table 9a). However, when the level of academic R&D expenditures is measured as a proportion of the state's economic output, Nebraska academic R&D expenditure is relatively intense. Measuring academic R&D in terms of dollars per $1,000 of a state's gross domestic product (GDP), Nebraska ranked well against the benchmark states as the Battelle report noted, "Nebraska's level of academic R&D expenditures relative to the state's overall economic output is well above the national level and one of the highest among the benchmark states" [Battelle, 2010, p. 22].

Table 9a. Key Indicators: Academic R&D Expenditures and Intensity

State	Academic R&D Expenditure Levels (Millions of Dollars			Academic R&D Expenditure per Thousand Dollars of Gross Domestic Product		
	2007	2013	Percent Change 2007–13	2007	2013	Percent Change 2007–13
United States	**$49,406**	**$63,370**	**28.3%**	**$3.34**	**$4.11**	**23.1%**
Nebraska	**$365**	**$420**	**15.1%**	**$4.26**	**$4.27**	**0.1%**
Iowa	$587	$693	18.1%	$4.13	$4.56	10.4%
Kansas	$376	$500	33.0%	$2.98	$4.17	28.5%
Minnesota	$637	$870	36.6%	$2.38	$3.06	28.7%
Oklahoma	$299	$385	28.8%	$2.19	$2.44	16.1%
Tennessee	$761	$980	28.8%	$2.99	$2.99	20.9%
Utah	$413	$673	63.0%	$3.50	$5.41	54.5%
Virginia	$972	$1,323	36.1%	$2.38	$3.10	30.0%
Wisconsin	$1,067	$1,278	19.8%	$4.18	$4.80	15.0%

Source: National Science Foundation Survey of R&D Expenditures at Universities and Colleges; US Bureau of Economic Analysis; National

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Science Foundation/Division of Science Resources Statistics, Survey of Industrial Research and Development.
Note: GDP is in chained 2009 dollars.

The last three columns of Table 9a present a measure of the intensity of academic R&D expenditures for 2007 and 2013. In 2007, $4.26 worth of R&D expenditures occurred at Nebraska's academic institutions for every $1,000 of the state's economic output. This was nearly $1 more than academic R&D spending in the US as a whole, and more than every benchmark state. In 2013, Nebraska's academic R&D spending per $1,000 of output increase by one cent, to $4.27. US spending on this measure increased by 23.1% to $4.11, and by 2013, Iowa, Utah, and Wisconsin were spending more than Nebraska on academic R&D.

In industrial R&D, Nebraska similarly had a relatively low level of R&D expenditures. In 2010, the Battelle report noted that between 2001 and 2007, Nebraska has a small but fast-growing base. Industry R&D grew 59.6% during this period, compared to the US growth rate of 33.3%. Moreover, only Virginia, among the benchmark states, saw industry R&D grow at a faster rate [Battelle, 2010, p. 23].

Table 9b presents the levels of industry R&D expenditures, the intensity of those expenditures, and the growth rates from 2006 to 2012, the last year data is available for industry R&D spending. In 2006, $447 million were spent on R&D in an industrial setting, rising by 29.3% to $578 million in 2012. Industry R&D spending in Nebraska was below all of the benchmark states in 2006, but by 2012 had surpassed one state, Oklahoma. The growth rate over the 2006–2012 period, 29.3%, continued to outpace US growth, and all of the other states except Iowa, Utah, and Wisconsin. During the period of the Great Recession, three benchmark states experienced less R&D in 2012 compared with 2006, and two other states had positive, but nearly flat, growth between those two years.

In terms of intensity, measured as industry R&D spending per $1,000 of state economic output, Nebraska's experience is more modest. At $5.29, industry R&D is much less than the $16.71 rate experienced at the national level. In 2006 Nebraska trailed in the intensity of industry R&D spending

Table 9b. Key Indicators: Industry R&D Expenditures and Intensity

State	Industry R&D Expenditure Levels (Millions of Dollars			Industry R&D Expenditure per Thousand Dollars of Gross Domestic Product		
	2006	2012	Percent Change 2006–12	2006	2012	Percent Change 2006–12
United States	**$243,853**	**$292,675**	**20.0%**	**$16.71**	**$19.32**	**15.6%**
Nebraska	**$447**	**$578**	**29.3%**	**$5.29**	**$6.10**	**15.3%**
Iowa	$1,055	$1,763	67.1%	$7.69	$11.84	54.3%
Kansas	$2,064	$2,072	0.4%	$17.05	$15.82	-7.2%
Minnesota	$6,296	$6,216	-1.3%	$23.52	$22.33	-5.0%

Oklahoma	$474	$463	-2.3%	$3.38	$2.98	-11.7%
Tennessee	$1,428	$1,437	0.6%	$5.55	$5.38	-3.0%
Utah	$1,274	$2,134	67.5%	$11.46	$17.80	55.3%
Virginia	$4,816	$4,756	-1.2%	$11.89	$11.18	-6.0%
Wisconsin	$3,020	$4,135	36.9%	$11.87	$15.88	33.8%

Source: National Science Foundation Survey of R&D Expenditures at Universities and Colleges; US Bureau of Economic Analysis; National
Science Foundation/Division of Science Resources Statistics, Survey of Industrial Research and Development.
Note: GDP is in chained 2009 dollars.

compared to the benchmark states, with R&D greater than only $3.38 in Oklahoma. Growth in Nebraska's industry R&D between 2006 and 2012, at 15.3%, nearly matched the US growth rate, and was greater than five of the benchmark states, which incidentally experienced less industry R&D spending per unit of economic output in 2012 than in 2006.

In terms of R&D expenditure and intensity, Nebraska did reasonably well compared to the benchmark states on this measure of innovation. Nebraska's academic institutions especially appear ready to lead Nebraska to an innovation-driven economy.

Innovation Potential Measured as Research and Development Expenditures

Battelle's final measure of Nebraska's preparedness to develop an innovation-driven economy is based on patent generation and university technology transfer activity. The Research Division is unable to compare patent information directly with the Battelle report, as Battelle used proprietary data to develop their estimates. It appears that differences between the Battelle data and the data used in this report result in similar conclusions.

Table 10a is based on data from the US Patent and Trademark Office. The state from which a patent originates is considered in the tables below to be the state of the first-named inventor on the patent. Between 2001 and 2014, Nebraska inventors were granted 3,143 US patents. This is less than half the number awarded by Oklahoma inventors, the next closest state. In terms of the number of patents per 100,000 of population, Nebraska fared somewhat better compared to the benchmark states, but still had fewer patents awarded on this measure than all of the benchmark states. The last two columns of the table

Table 10a. Key Indicators: Patents Granted

State	Total Patents	Patents per 100,000 Population		
	2001–2014	2001–2014	2001–2007	2008–2014
United States	**1,366,257**	**451.97**	**201.65**	**248.87**
Nebraska	**3,143**	**175.02**	**78.49**	**96.09**
Iowa	10,123	336.25	153.16	182.57
Kansas	8,070	288.06	106.14	180.24
Minnesota	44,472	851.96	373.93	475.50
Oklahoma	6,832	186.65	96.70	90.17
Tennessee	11,113	180.13	84.10	95.60
Utah	11,846	452.78	189.42	258.24
Virginia	18,450	236.94	100.39	135.16

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Wisconsin	24,066	429.13	212.92	216.15

Source: US Patent and Trademark Office. NDED calculations.
Note: Origin of a patent is determined by the residence of the first-named inventor.
present the number of patents awarded per 100,000 population in two time periods, 2001–2007 and 2008–2014. Once again, Nebraska's performance appears to have improved in the later period, and Nebraska's performance improved against the benchmark states. Nebraska inventors were awarded more patents per 100,000 residents than Oklahoma and Tennessee between 2008 and 2014.

The growth rate of patent applications between periods is addressed in Table 10b. In this table, annual growth rates were computed and averaged to determine average growth rates for the entire 2001 to 2014 time period and for the 2001–2007 and 2008–2014 subperiods that were used previously. Note that Nebraska inventors were awarded patents at a growth rate slightly higher rate than the US through the entire time period. However, much of that growth occurred during the later subperiod. Nebraska's rate of patents awarded also grew faster than four of the benchmark states.
Nebraska's average annual growth rate in patents granted declined between 2001 and 2007, but at a much lower average rate than the US as a whole. During this time period only two states, Kansas and Minnesota, saw the average annual rate of growth in patents increase, and Nebraska's average annual patent growth, while negative, was higher than any of the benchmark states that saw negative average annual growth rates during this period.
Through the 2008 to 2014 time period, the average annual growth rate in number of patents issued grew much faster than in the earlier period for the US as a whole and for all of the benchmark states. Between 2008 and 20014 the average annual growth rate of patent awards to Nebraska inventors, 12.2%, was greater than that for the US and for five of the benchmark states. It is interesting that the later subperiod saw faster average annual patent growth than the earlier subperiod. This is especially interesting since the first period contained a short recession in mid-2001 followed by a normal recovery that lasted through the end of 2007, and the second time period covered a deep recession from January 2008 through June of 2009.
In terms of 50-state rankings, Nebraska's average annual growth rate in number of patents, for any of the periods, is in the top 20 of all states, and Nebraska did relatively better during the 2001–2007 period, climbing to 14th best, when the rate of patent growth was slow. For the entire period, Nebraska's average annual growth rate was higher than 32 states, and higher than four of the benchmark states, Iowa, Oklahoma, Tennessee, and Wisconsin.

Table 10b. Key Indicators: Patents Granted, Average Growth Rates

State	Patents Granted Average Annual Growth Rate			State Rank Patents Granted Average Annual Growth Rate		
	2001–2014	2001–2007	2008–2014	2001–2014	2001–2007	2008–2014
United States	4.5%	-1.1%	11.3%	N/A	N/A	N/A

Nebraska	**4.8%**	**-0.7%**	**12.2%**	**18**	**14**	**19**
Iowa	2.9%	-2.9%	10.2%	35	31	32
Kansas	10.6%	6.9%	16.1%	2	3	4
Minnesota	5.2%	0.2%	11.1%	13	10	27
Oklahoma	1.2%	-1.7%	6.1%	46	24	46
Tennessee	3.0%	-4.0%	11.3%	34	42	24
Utah	6.0%	-1.0%	13.9%	7	16	8
Virginia	5.8%	-1.3%	13.4%	9	20	13
Wisconsin	1.6%	-3.8%	8.0%	43	42	42

Source: US Patent and Trademark Office. NDED calculations.
Note: Origin of a patent is determined by the residence of the first-named inventor.

The Research Division was unable to follow up on technology transfer activity. The Battelle report used proprietary data to which we do not have access. After reviewing descriptions of the data used, we questioned how this data should be interpreted. Some licensing revenue is the result of "running royalties (royalties earned on sales of products)," while other is based on license issue fees, payments under options, termination payment, annual minimums not supported by product sales, or cash-in equity [AUTM US Licensing Activity Survey FY2013 Highlights, p. 4, https://www.autm.net/FY2012_Licensing_Activity_Survey/14318.htm]. Given the size of running royalties for some universities, it would be hard to know if an increase is due to new technology or larger sales of existing products.

The conclusions of the 2010 Battelle report regarding the development of intellectual property and technology transfer in Nebraska appear to remain valid. In terms of "intellectual property Nebraska has been well below average in terms of patent generation" [Battelle, 2010, p. 23]. Nebraska remains well below average in terms of patent generation both during and after the period of the Battelle report. However, it appears that Nebraska's performance has improved in the last few years, and the growth rate in the number of patents appears to be increasing faster than average. As far as technology transfer, the Research Division has no new data, but notes that license income to the University of Nebraska appears to have increased dramatically since 2008. A 2012 *Chronicle of Higher Education* story calls Nebraska a "newcomer to the list of big earners. Its revenue from licensing grew from just over $3.7 million in 2010 to more than $16.7 million in 2011" ["Universities Report $1.8 Billion in Earnings on Inventions in 2011," *Chronicle of Higher Education* Aug. 28, 2012, http://chronicle.com/article/University-Inventions-Earned/133972/].

Conclusions

This review and update of the 2010 Battelle report's assessment of Nebraska's preparedness for an innovation-driven economy came to many of the same conclusions as the original report. Where the Research Division was able to reproduce Battelle's original work, the update from 2008 through the most recent available year, showed that in many areas Nebraska remained below the nation and most of the benchmark states. However, in a number of areas, Nebraska's measure has shown some improvement over the original 2001 through 2007 time frame.

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In measures of educational achievement, Nebraska remained below the national averages for science and engineering degrees as a percentage of all higher education degrees, science and engineering doctorate degrees as a percentage of science and engineering degrees, and science and engineering doctorate degrees per 100,000 of population, and the percentage of the population over age 25 with a bachelor's degree or higher. However, in each of these measures, Nebraska moved closer to the US figures in the later years of the analysis. Nebraska was higher than the national average in terms of science and engineering degrees conferred per 100,000 of population, and Nebraska's ranking on this measure among all the states also improved between 2007 and 2011.

In measures involving entrepreneurial activity, average annual growth in new business establishments, job creation rate from new business establishments, and the number of high revenue growth businesses, Nebraska again lagged behind the nation as a whole. But once again, Nebraska's measures improved relative to the national measures in the later time periods, indicating that Nebraska's entrepreneurial activity was increasing relative to the rest of the country.

The availability of risk capital, measured in terms of venture capital dollars and deals, showed Nebraska to be behind the nation and behind most of the benchmark states in terms of venture capital investment and venture capital deals, and also in terms of per capita venture capital investments and per capita venture capital deals. There was not enough data to look at Nebraska's performance over time, on venture capital measures, so the Research Division cannot say if Nebraska has improved over time on either of these measures. Another measure of risk capital availability used by Battelle is the number of awards through the Small Business Innovation Research program. On a per capita basis, Nebraska was well below the national average in the time periods reviewed, and below most all of the benchmark states in each time period.

In the measures of R&D capability, Nebraska's academic R&D spending levels were below most of the benchmark states in terms of expenditures; however, in terms of R&D intensity—R&D dollars spent per $1,000 of state economic output—Nebraska ranked higher than the national level, and higher than most of the benchmark states. In measures of Industry R&D spending, Nebraska's expenditure levels were below most of the benchmark states. In terms of the intensity of industry R&D spending, Nebraska was well below the national average and most of the benchmark states. Nebraska did improve in these areas between 2006 and 2012.

In Battelle's final measure of an innovation-ready economy, intellectual property generation and technology transfer, Nebraska again showed poor performance compared to national averages and against the benchmark states. Measuring intellectual property generation by the number of patents granted on a per capita basis, Nebraska had less than half of the patent awards per capita than the national rate in all time periods reviewed. Nebraska had the lowest rate of patents awarded per capita of the benchmark states in 2001 through 2007 period. However, Nebraska's rate of patent awards per capita was higher than two benchmark states in the 2008 through 2014 period.

Overall, the update of innovation in Nebraska, based on Battelle's measures, shows that Nebraska tended to improve over time, both against national measures and against benchmark states. Perhaps the most impressive part of this improvement is that Nebraska managed this

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improvement during a very challenging economy, beginning with the start of the Great Recession and continuing through a slow recovery.

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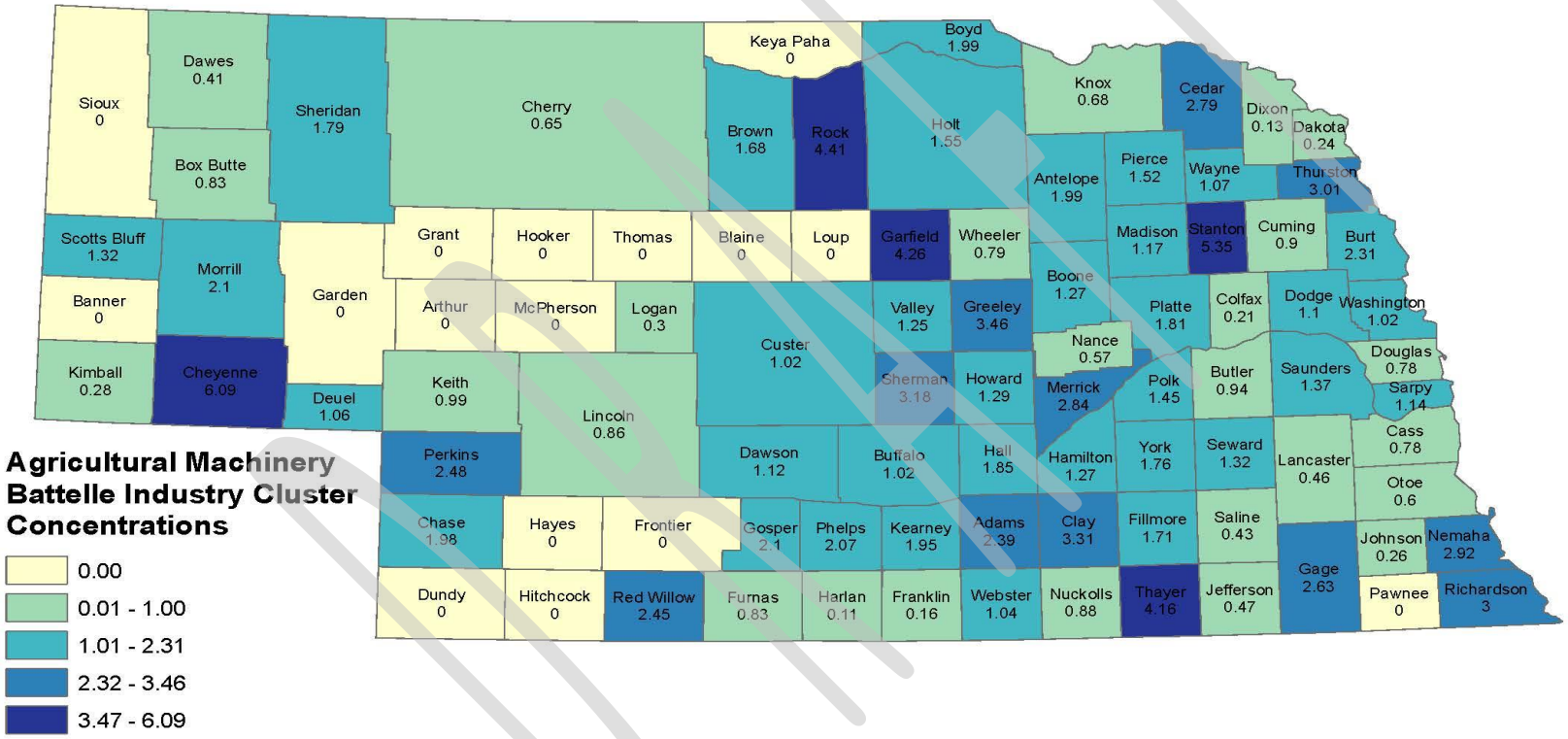
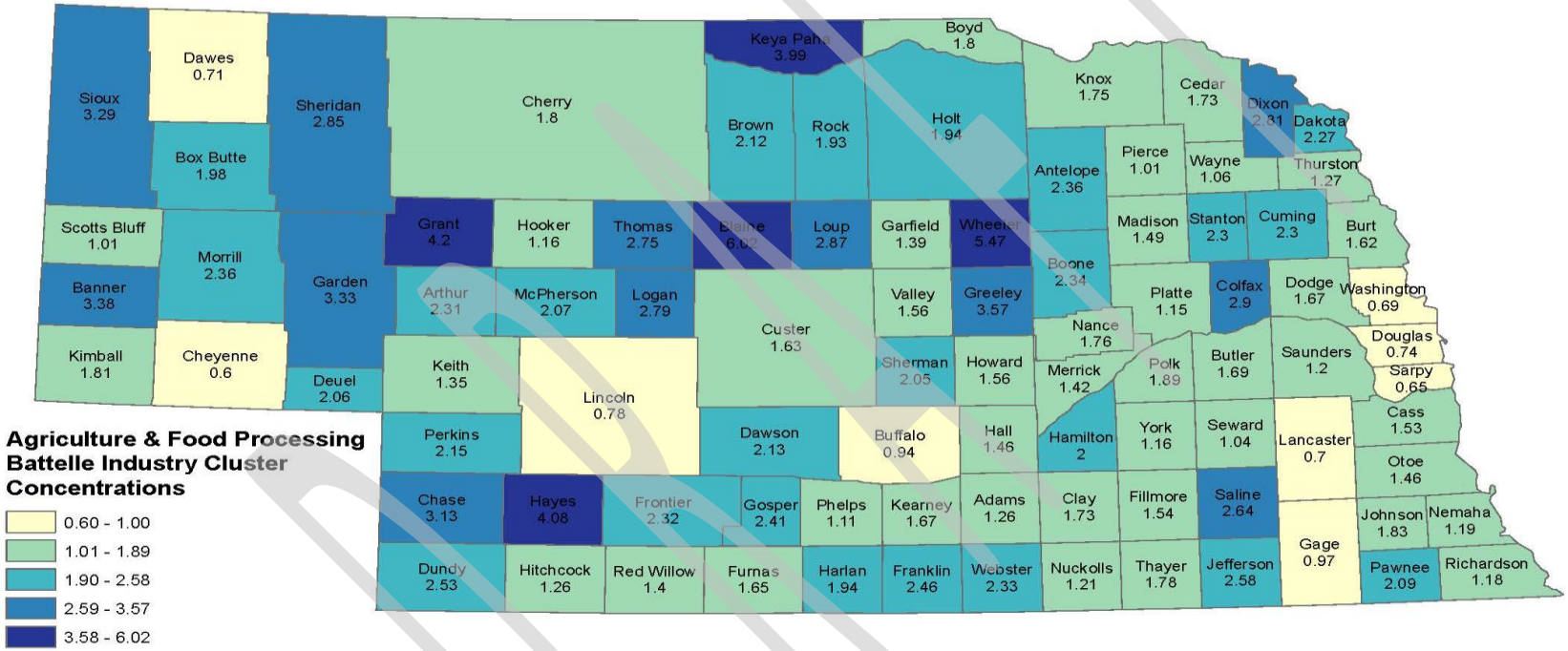
AGRICULTURAL MACHINERY BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



Colors from www.ColorBrewer.org by Cynthia A. Brewer, Geography, Pennsylvania State University.

AGRICULTURE AND FOOD PROCESSING BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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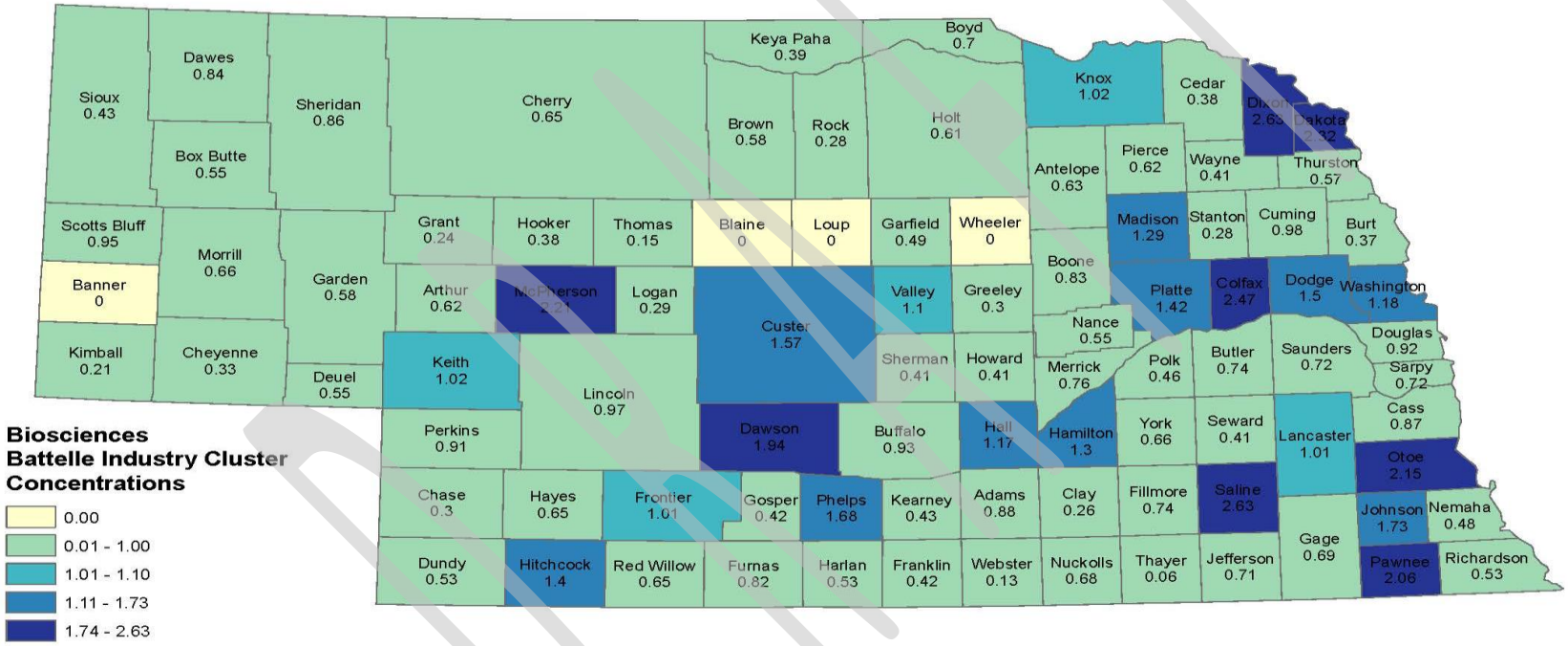
BIOSCIENCES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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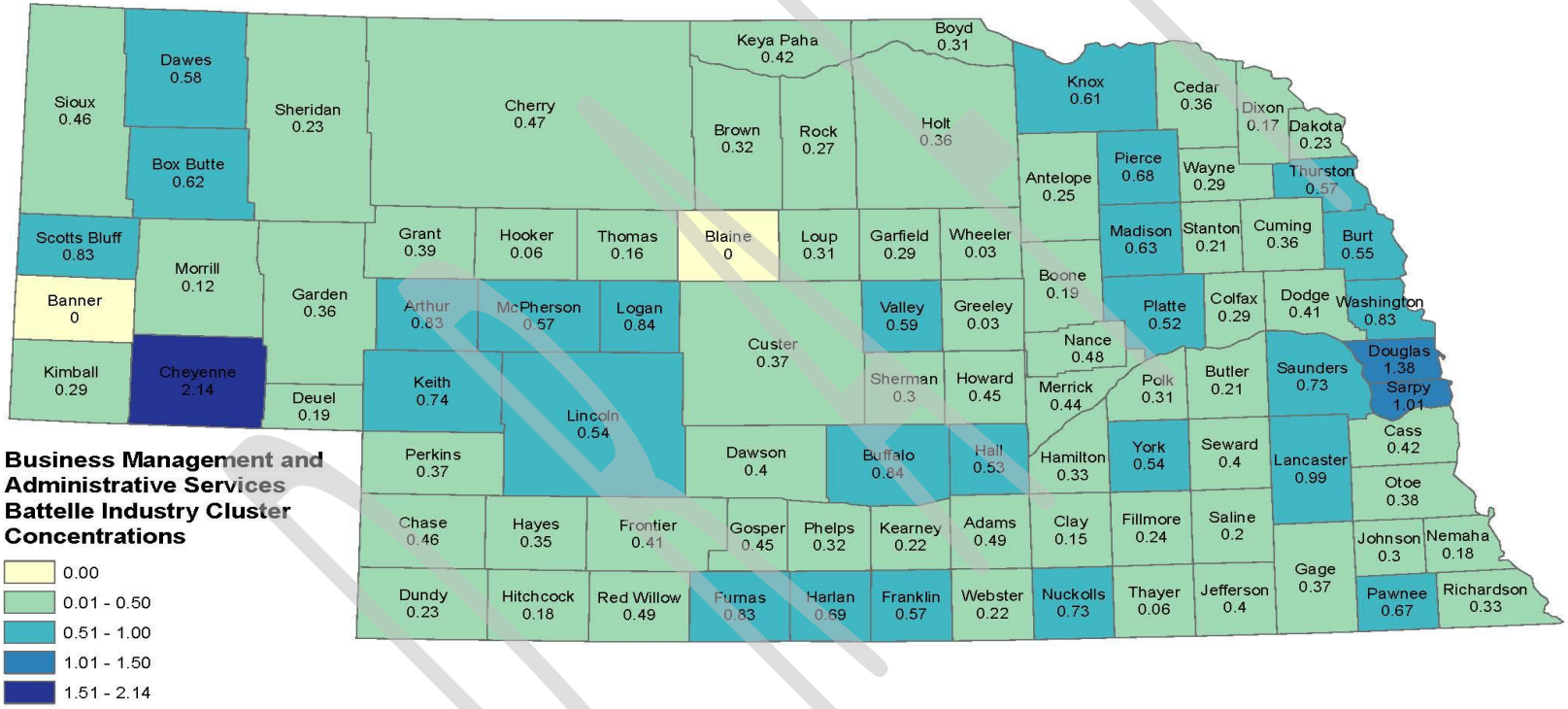
BUSINESS MANAGEMENT AND ADMINISTRATIVE SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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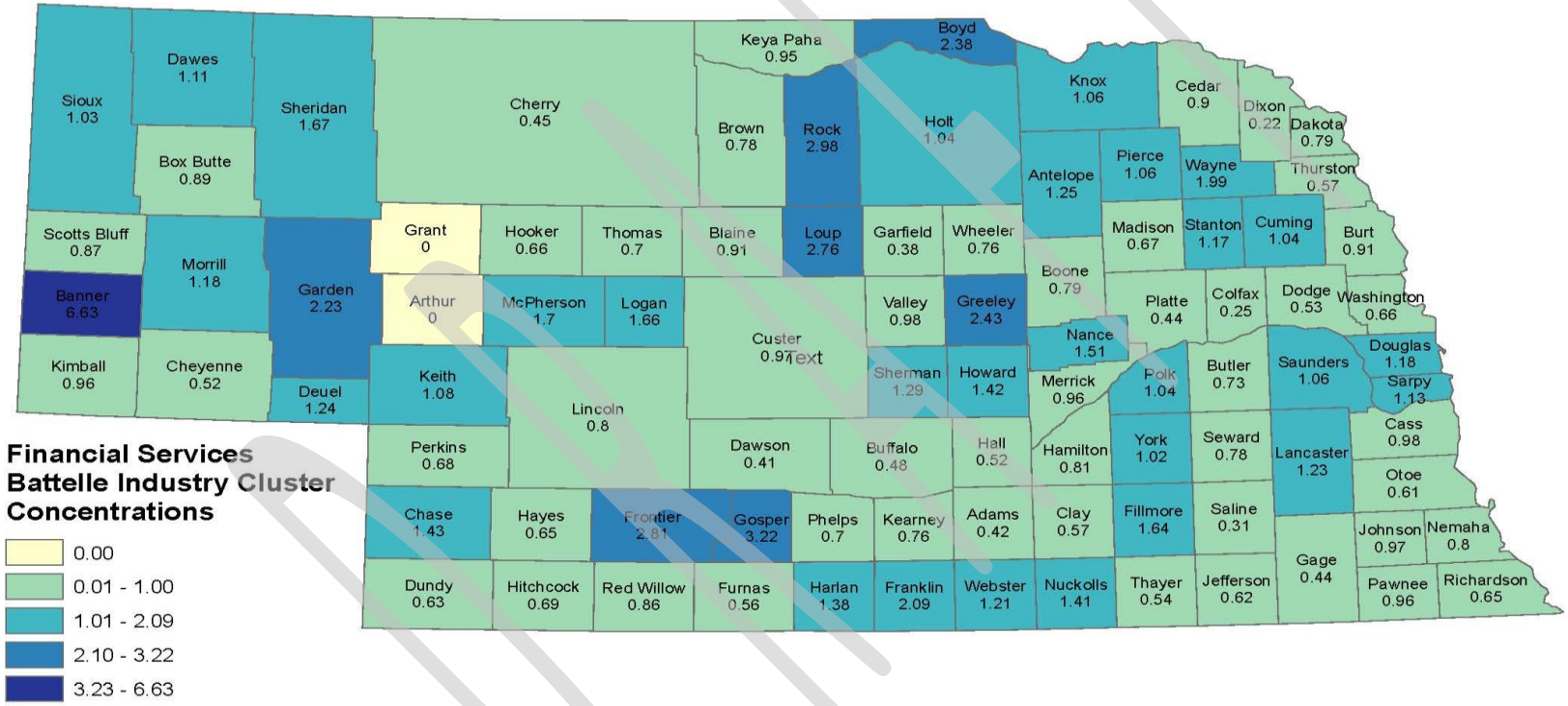
FINANCIAL SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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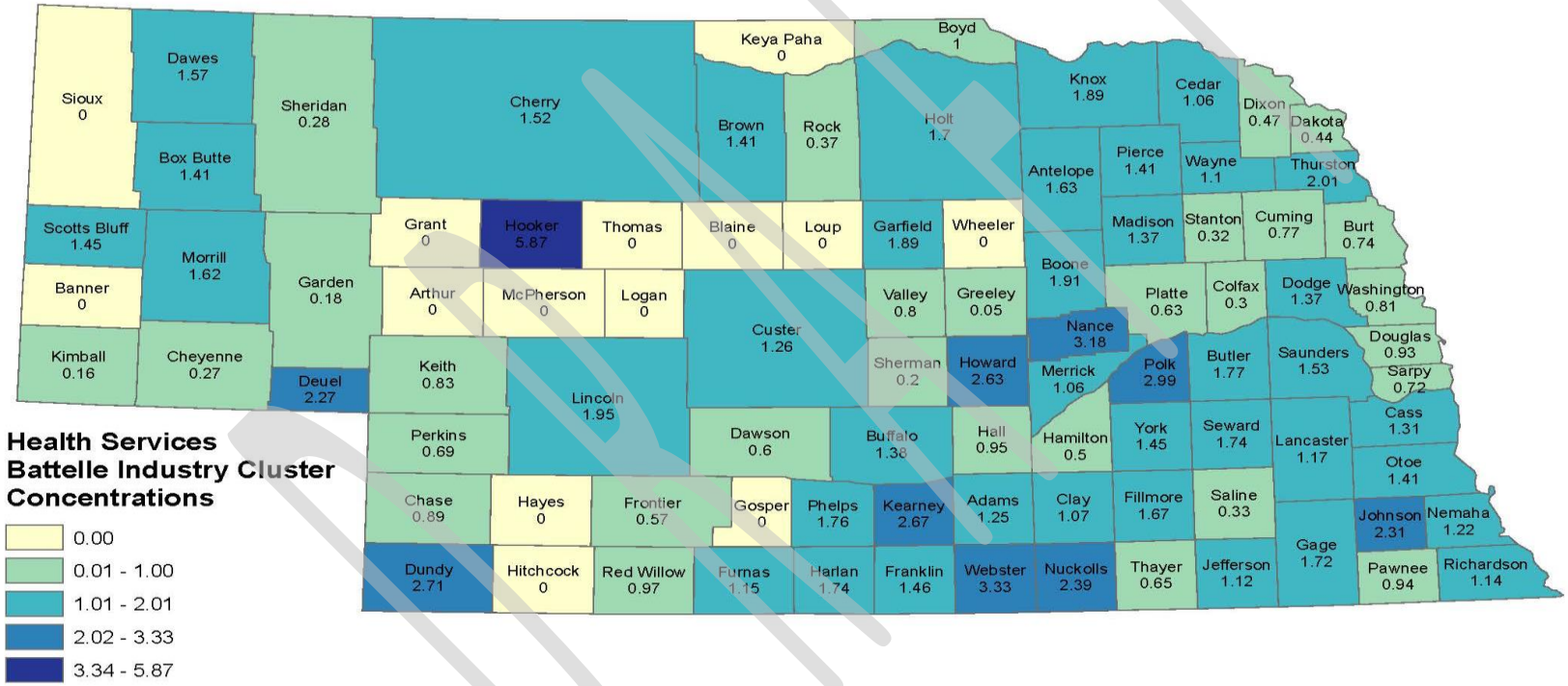
HEALTH SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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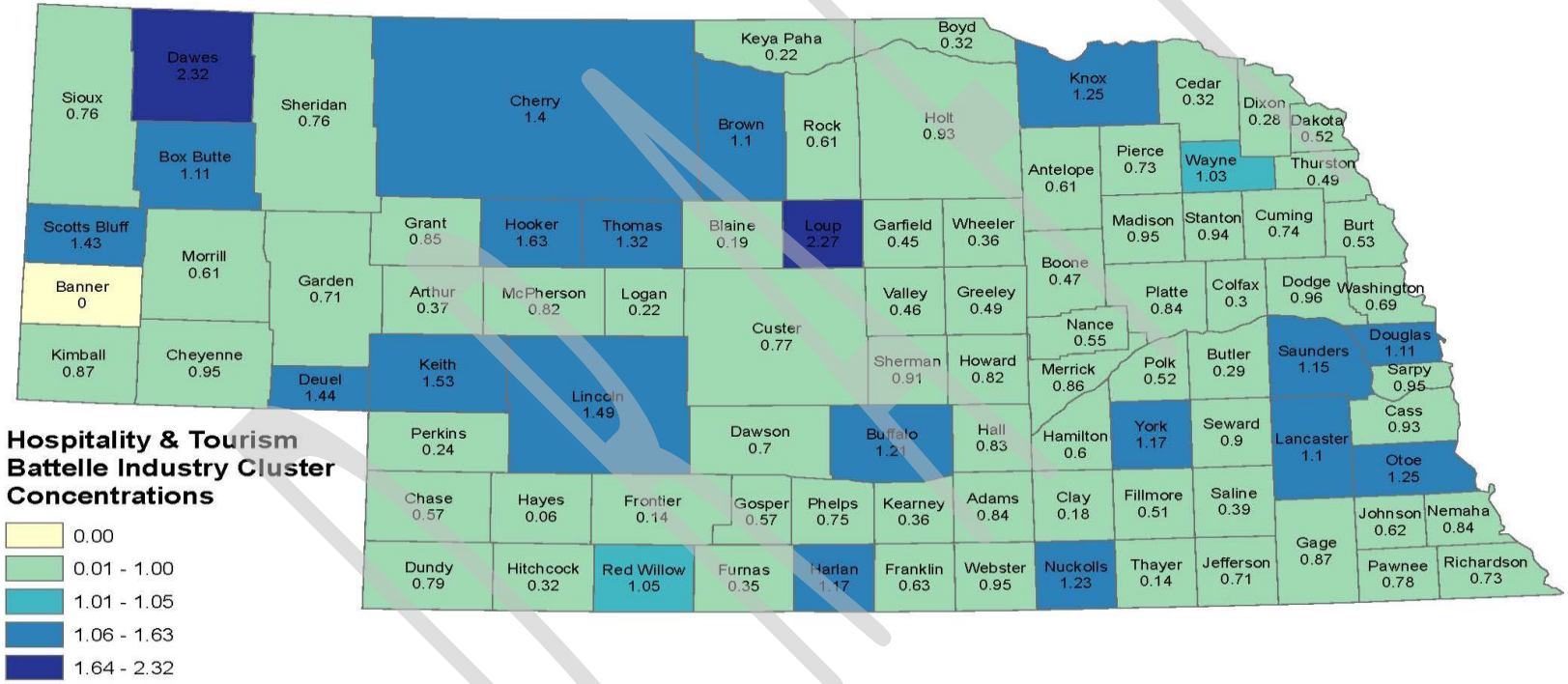
HOSPITALITY AND TOURISM BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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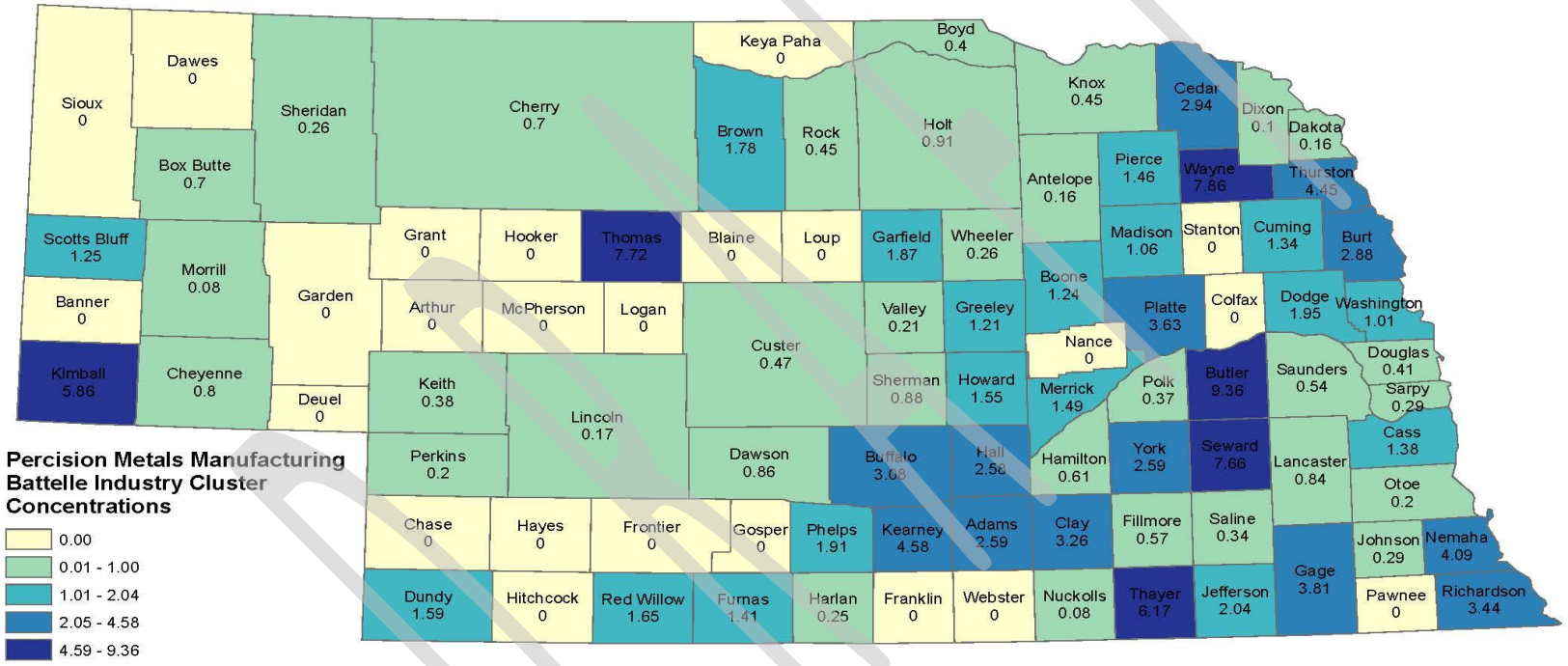
PRECISION METALS MANUFACTURING BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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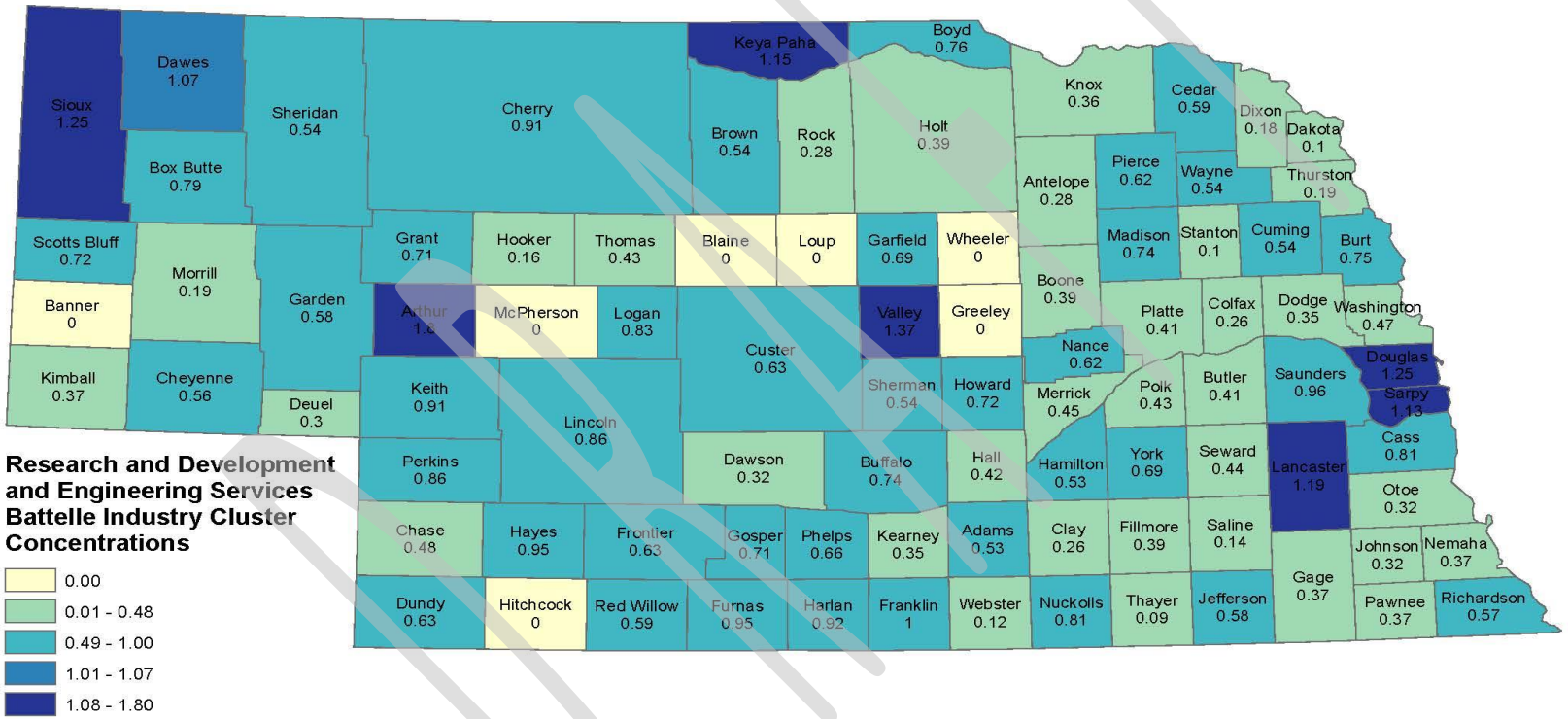
R&D AND ENGINEERING SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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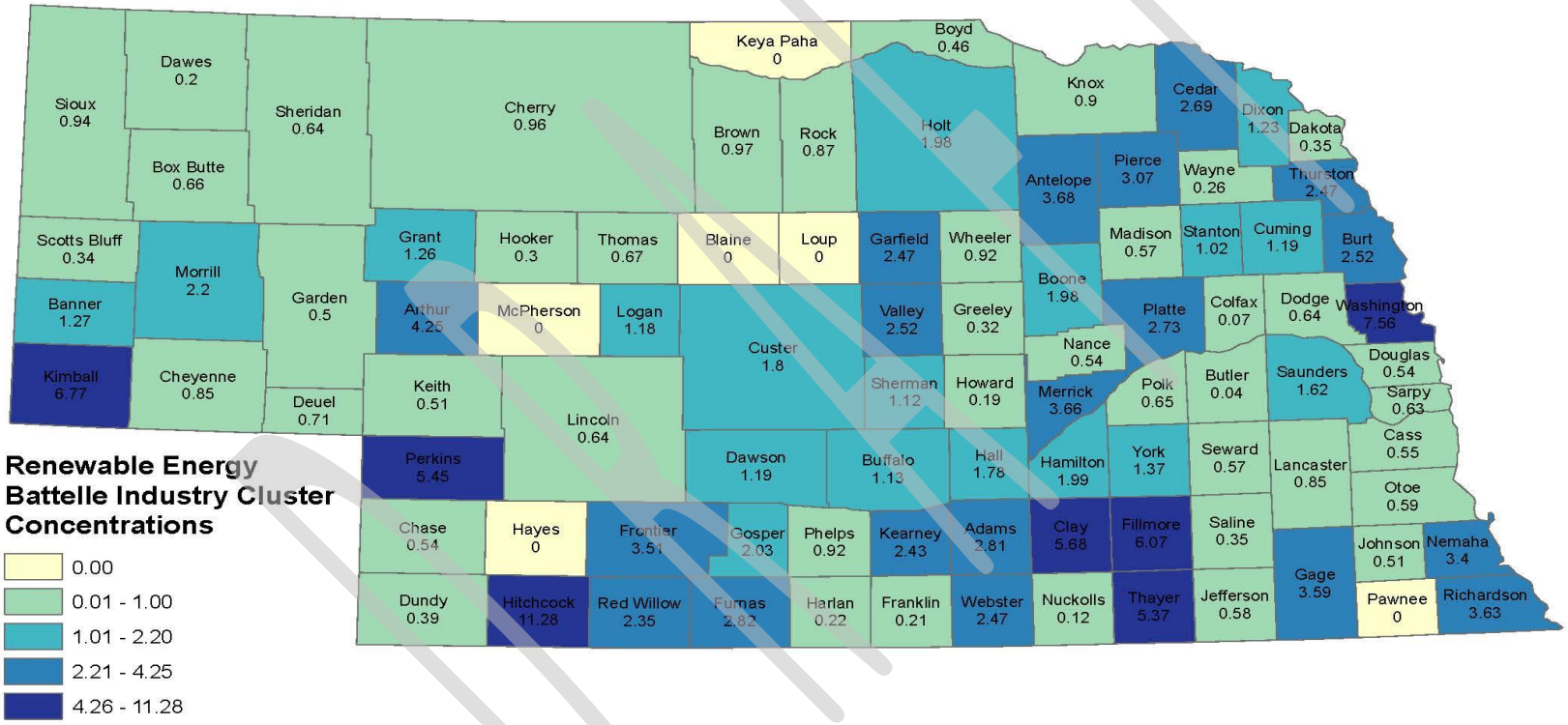
RENEWABLE ENERGY BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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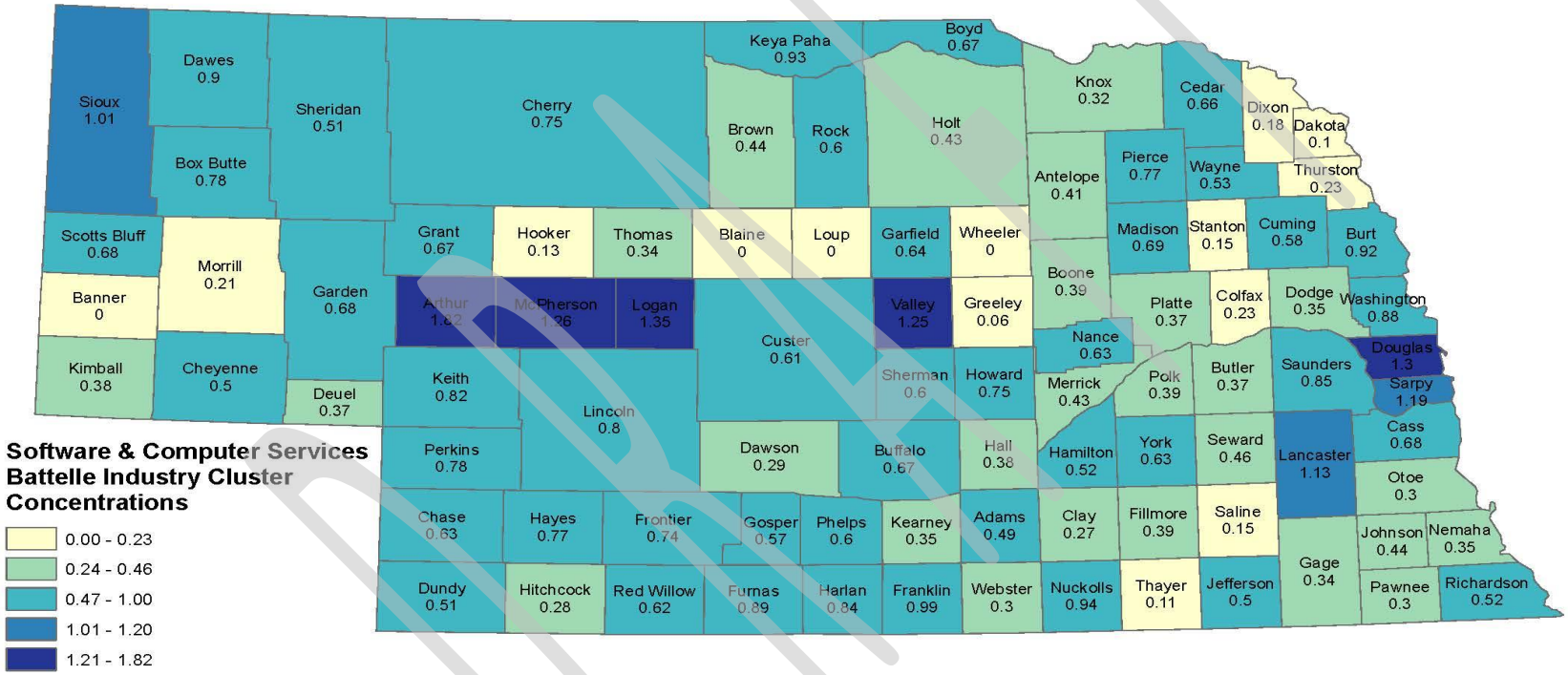
SOFTWARE AND COMPUTER SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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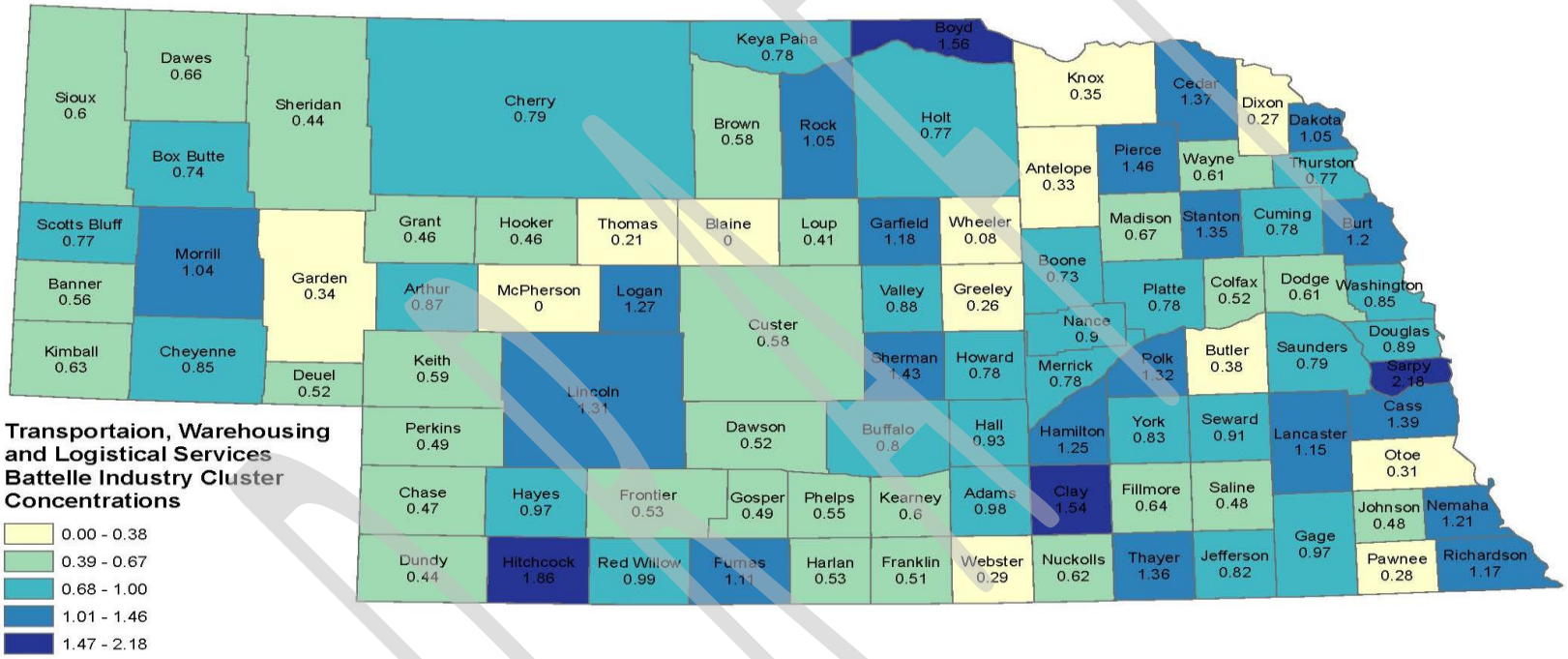
TRANSPORTATION, WAREHOUSING AND LOGISTICAL SERVICES BATTELLE INDUSTRY CULSTER CONCENTRATION MAP



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Appendix C: Office of Employment and Training Limited English Proficiency Plan

NEBRASKA
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March 2015

I. Executive Summary:

Individuals who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may incur a barrier to employment and are entitled to language assistance in their effort to enter the workforce. The quality and accuracy of the language is critical to these efforts and shall be provided in a timely manner to ensure maximum access to services. This plan provides individuals with Limited English Proficiency (LEP) access to programs and services provided by the American Job Centers and Nebraska Department of Labor (NDOL) offices on an equitable basis. This plan is applicable to all entities in the NDOL Office of Employment and Training (OET) that receive federal financial assistance, and any subrecipients of such funds. This plan reflects the LEP needs of Wagner-Peyser and Veterans operations statewide and in all local offices.

II. Introduction/Background

a. Planning Committee

In an effort to provide equitable services to individuals with Limited English Proficiency the OET has established a planning committee consisting of the following team members:

2015 LEP Planning Committee

Mary Hinojosa, Scottsbluff (bilingual)	Abelino Ortiz, Omaha (bilingual)
Scott Bell, North Platte	Joel Roos, Virtual Services Unit (bilingual)
Randy Kissinger, Grand Island	Mary Findlay, LMI
Kari Janssen, Beatrice	Retha Dunn, OET
Ada Sanchez, Columbus (bilingual)	Lorena Hernandez, OET
Bil Robv. Lincoln	

b. Purpose

The planning committee is responsible for: identifying major concentrations of ethnic groups with Limited English Proficiency in each region; staff training needs; inventorying and identifying language assistance aids such as posters, handbooks, forms, handouts, etc.; and making recommendations to OET for development of other language assistance aids to assist with service delivery.

The OET LEP Plan is reviewed and updated on an annual basis with the exception of any major changes in demographics, types of services, program changes, or other factors affecting a specific

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geographic location. Should any of these changes occur, an immediate review of the situation, and plan update will be completed. The annual review, as well as any necessary modifications, will be conducted by the LEP committee members. The LEP committee schedules meetings on a quarterly basis to review any issues or concerns potentially affecting the LEP plan or LEP populations.

The Wagner-Peyser Governor's Reserve funds (10% set aside) will be used to support procurement of language assistance materials and to support costs associated with group language assistance training. Individual clients who require language assistance training and are eligible for Workforce Investment Act (WIA) programs and services may be funded from the specific program area funds (Adult, Dislocated Worker, and Youth). These determinations will be left to the Local WIA Areas. Language assistance tools will also be utilized on an as needed basis for the State Rapid Response Activities and the Trade Adjustment Assistant Assistance (TAA) Program.

The goal of this plan is to function as a tool used to assess the effectiveness of OET's service delivery to LEP individuals.

c. Title VI of Civil Rights Act of 1964

Section 601 of Title VI of the Civil Rights Act of 1964 provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The requirement to provide meaningful access under Title VI applies beyond the education context to include all of the programs and activities of all recipients of Federal financial assistance.

d. Executive Order No. 13166

On Aug. 11, 2000, President Clinton issued Executive Order No. 13166, entitled "Improving Access to Service for Persons with Limited English Proficiency" (available electronically at http://www.dol.gov/oasam/regs/statutes/Eo13166.pdf). This executive order was meant to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure equal accessibility to federally funded programs and services to otherwise eligible individuals not proficient in the English language. The executive order states that:

Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.

Executive Order No. 13166 ensures that in addition to federal agencies, recipients of federal financial assistance funds must also comply with Title VI and the LEP guidelines of the agency from which the funds are received. In addition, each agency subject to the requirements of Title VI must

publish guidance to its respective recipients clarifying its obligation. As a recipient of federal funding, this requirement applies to all programs and services offered by OET.

e. United States Department of Labor Guidance

The United States Department of Labor (DOL) has provided policy guidance to federal financial assistance recipients regarding the Title VI prohibition against national origin discrimination affecting LEP persons. The DOL has created a webpage entitled "LEP Toolkit" which provides numerous resources for recipient agencies to utilize as they create LEP Plans. This webpage is accessible at http://www.dol.gov/oasam/programs/crc/lepcnt.htm.

Among the available LEP planning resources provided by DOL, is the "Policy Guidance on the Prohibition of National Origin Discrimination as it Affect Person with Limited English." This guidance policy was published in the Federal Register on May 29, 2003. The DOL policy guidance states:

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally assisted programs and activities.

The DOL policy guidance helps to ensure "that federally assisted programs aimed at the American public do not leave some behind simply because they face challenges communicating in English." Subrecipients likewise are held to the same standards when federal funds are passed through from one recipient to a subrecipient.

In the DOL context, Section 188 of the Workforce Investment Act (WIA) provides regulations for the implementation of policies and procedures that provide equal opportunity and equal access in a nondiscriminatory manner. Section 188 states that where ''a significant number or proportion of the population eligible to be served, or likely to be directly affected, by a WIA Title I

- assisted program or activity may need services or information in a language other than English in order to be effectively informed about, or able to participate in, the program or activity,''

The Section 188 regulations require recipients ''to take reasonable steps to provide services and information in appropriate languages.'' [29 CFR 37.35(a)] Even where there is not a ''significant'' number or proportion of LEP persons in the community serviced by the recipient, recipients nonetheless are required to ''make reasonable efforts to meet the particularized language needs of Limited-English speaking individuals who seek services or information from the recipient.'' [29 CFR 37.35(b)]

III. The Four-Factor Analysis

Recipients and subrecipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and

fact-dependent standard, the DOL has stated that the starting point is an individualized assessment that balances the following four factors:

Factor 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population

The U.S. Census Bureau has a range of four classifications of how well people speak English. The classifications are (1) 'Very Well,' (2) 'Well,' (3) 'Not Well,' and (4) 'Not at All.' For planning and statistical purposes, we are considering individuals who speak English at any level below "Very Well" as Limited English Proficient (LEP).

As part of this planning process, we have included statistics from the 2012 U.S. Census Bureau American Community Survey 5-Year Estimates Table to illustrate the number of individuals living in the state of Nebraska who speak English less than "Very Well." In addition, this U.S. Census survey indicates the number of individuals in each language group among the total population of individuals who speak English less than "Very Well." These statistics help to identify prominent and/or growing language groups for planning purposes at a state level, region level, and by Workforce Investment Area.

Factor 2: The Frequency with Which LEP Individuals Come in Contact with the Program

The program must be evaluated in relationship to the number of LEP persons who are within the program area and the number of times those persons have frequented the program or activity. NDOL utilizes the NEworks system, the state's public labor exchange system, to provide information to job seekers, to register program applicants and participants, and to list available jobs throughout Nebraska. User statistics have been pulled from NEworks Registered Individuals, which indicate voluntary self- identification information which may help to indicate a potential need for language assistance among individuals.

To help indicate the frequency with which LEP individuals come in contact with NDOL programs, NEworks data for Program Year 2012 (June 30, 2012 to July 1, 2013) has been used. The NEworks data has been localized to each individual office.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient

The OET provides a wide range of programs, activities and services. The OET provides Veterans Services, Job Seeker Services, Business Services, Labor Market Information, and a multitude of other services. The OET is responsible for administering numerous programs that receive federal funding, including: Workforce Investment Act, Wagner- Peyser, Veterans, Trade Adjustment Assistance, Rapid Response, Work Opportunity Tax Credit (WOTC), and many other programs receiving federal funding or grants.

Factor 4: The Resources Available to the Recipient and Costs

OET serves the entire state of Nebraska and is required by federal law to provide access to LEP persons, and to ensure that its sub-recipients also provide such access.

IV. Identifying Individuals with Limited English Proficiency:

To achieve equal access to all programs offered by OET, it is essential to conduct a thorough assessment of the language needs of the populations served by attempting to identify LEP individuals. In order to identify language needs, the LEP committee has reviewed available language data from the U.S. Census American Community Survey and from self-identifying information from NEworks registrants.

The U. S. Census American Community Survey 2009-2013 estimates, the most recent data available for county level data, show that there were 81,310 Nebraskans age five years and older who speak a language other than English at home and speak English less than "Very Well." This number constitutes approximately 4.8% of the population age five and older in Nebraska (1,711,160). Spanish speakers make up seven in ten (70.5%) of the people who speak English less than "Very Well" in Nebraska.

Since 2007, speakers of languages falling under the category "African languages" has increased significantly, and moved up in the rankings.

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in Nebraska

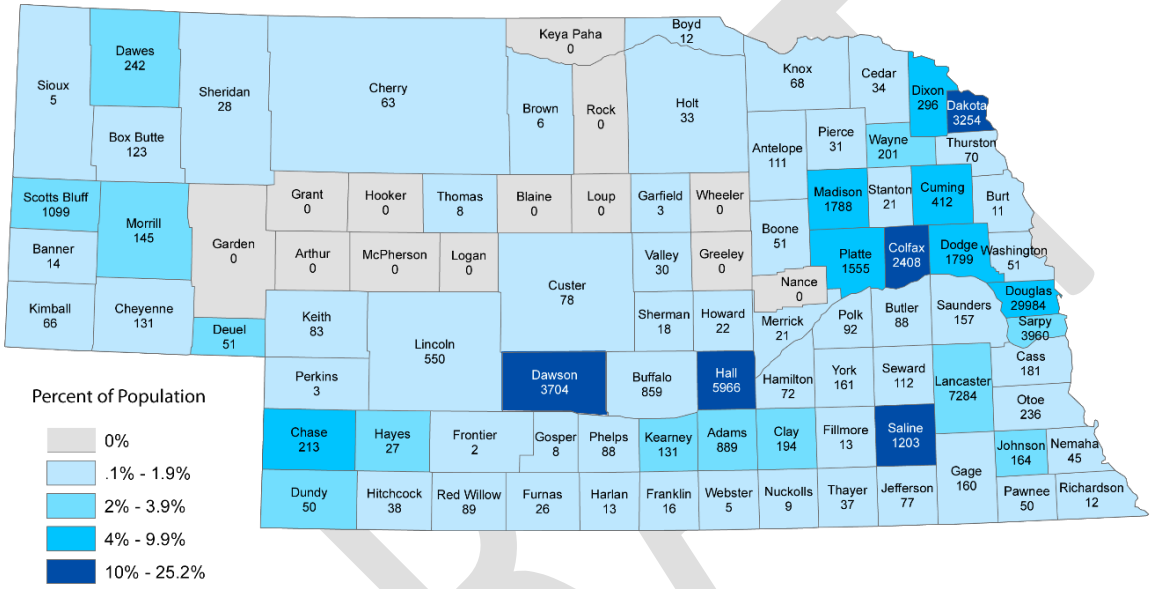
Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	57,286	70.5%
Vietnamese	4,627	5.7%
African	2,657	3.3%
Chinese	2,611	3.2%
Other Asian	2,365	2.9%
Arabic	1,767	2.2%
French (incl. Patois, Cajun)	1,438	1.8%
Other Indic	990	1.2%
German	764	0.9%
Other and unspecified	577	0.7%
All Other Languages	6,228	7.7%
Nebraska Total	**81,310**	**100.0%**

2012 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

Greater Nebraska (88 counties) has 32,043 LEP individuals, which constitutes 39.4% of the state's linguistically isolated population. The Greater Lincoln Workforce Investment Area (2 counties) has 11,962 LEP individuals or 14.7%, and Greater Omaha (3 counties) has 37,305 or 45.9% of the population that speak English less than "Very Well."

Among individuals who do not speak English "Very Well," Spanish-speakers comprise a significant percentage of the population of several counties in Nebraska. More than one quarter of the people in Colfax County (25.2 percent), 17.1% in Dakota County and 16.5% in Dawson County fall into this category. The highest concentrations of linguistically isolated individuals are in the northeast portion of the state as shown on the map below.

Number and Percent of County Population Who Speak Spanish and Speak English Not "Very Well"



(a) Greater Nebraska Workforce Development Area:
The U. S. Census American Community Survey 2009-2013 estimates, the most recent data available for county level data, show that there were 32,043 individuals in Greater Nebraska age five years and older who speak a language other than English at home and speak English less than "Very Well." Among individuals who speak English less than "Very Well," 86.1 percent speak Spanish.

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the Greater Nebraska Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	27,574	86.1%
African languages	896	2.8%
Vietnamese	562	1.8%
Laotian	460	1.4%
Chinese	458	1.4%

German	360	1.1%
French (incl. Patois, Cajun)	167	0.5%
Other Slavic	165	0.5%
Thai	149	0.5%
Other and unspecified	145	0.5%
All Other Languages	1,107	3.5%
Greater Nebraska Workforce Investment	**32,043**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

NDOL Regions and Offices

(b) Greater Nebraska Region 1

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the Region 1 of the Greater Nebraska Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	1,626	75.6%
Other Pacific Island	89	4.1%
Thai	88	4.1%
Chinese	67	3.1%
German	62	2.9%
Other Native North American	42	2.0%

Korean	38	1.8%
Tagalog	30	1.4%
Other Asian	20	0.9%
Hungarian	18	0.8%
All Other Languages	71	3.3%
Region 1 of the Greater Nebraska Workforce	**2,151**	**100.0%**

2013 ACS 5-Year Estimates

Scottsbluff: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 18% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 14.29% of new WIA participants during PY13 self-identified as Hispanic.

Alliance: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 9% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that there were not any WIA participants during PY13 self-identified as Hispanic.

Greater Nebraska Region 2

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the Region 2 of the Greater Nebraska Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	4,432	88.7%
African	287	5.7%
Chinese	85	1.7%
Vietnamese	36	0.7%
Tagalog	33	0.7%
Thai	32	0.6%
French (incl. Patois, Cajun)	24	0.5%
Polish	23	0.5%
German	20	0.4%
Russian	10	0.2%
All Other Languages	12	0.2%
Region 2 of the Greater Nebraska Workforce	**2,151**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

North Platte: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 6.84% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 10% of new WIA participants during PY13 self-identified as Hispanic.

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Lexington: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 26.48% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 36% of new WIA participants during PY13 self-identified as Hispanic.

(c) Greater Nebraska Region 3

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in Region 3 of the Greater Nebraska Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	7,823	86.1%
Vietnamese	223	2.5%
African	214	2.4%
Laotian	198	2.2%
German	154	1.7%
Other and unspecified	117	1.3%
Chinese	78	0.9%
French (incl. Patois, Cajun)	69	0.8%
Other Indic	38	0.4%
Persian	29	0.3%
All Other Languages	145	1.6%
Region 3 of the Greater Nebraska Workforce	**9,088**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

Grand Island American Job Center: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 20.98% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 15.57% of new WIA participants during PY13 self-identified as Hispanic.

Hastings: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 12.99% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 14.71% of new WIA participants during PY13 self-identified as Hispanic.

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(d) Greater Nebraska Region 4

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in Region 4 of the Greater Nebraska Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	2,256	78.9%
Laotian	167	5.8%
Other Slavic	77	2.7%
German	75	2.6%
Vietnamese	74	2.6%
Chinese	52	1.8%
Other West Germanic	43	1.5%
French (incl. Patois, Cajun)	31	1.1%
Other Indic	22	0.8%
Gujarati	17	0.6%
All Other Languages	46	1.6%
Region 4 of the Greater Nebraska Workforce	**2,860**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

Beatrice, Nebraska City, and York: These three offices combined serve a small number of limited English speaking clients. Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 4.97% of registered individuals during PY13 self- identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 5.17% of new WIA participants during PY13 self-identified as Hispanic.

(e) Greater Nebraska Region 5

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in Nebraska

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	11,437	88.3%
African	389	3.0%
Vietnamese	215	1.7%
Chinese	176	1.4%
Laotian	95	0.7%
Japanese	84	0.6%
Arabic	82	0.6%
Other Slavic	71	0.5%

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German	49	0.4%
Other Native North American	40	0.3%
All Other Languages	312	2.4%
Region 5 of the Greater Nebraska Workforce	**12,950**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

Norfolk: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 12.08% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 20.97% of new WIA participants during PY13 self-identified as Hispanic.

Columbus: Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 31.76% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 11.32% of new WIA participants during PY13 self-identified as Hispanic.

(f) Omaha Workforce Investment Area:

The U. S. Census American Community Survey 2009-2013 estimates show that the Omaha Workforce Investment Area has a total of 37,305 individuals that speak English less than "Very Well." The table below displays the top 10 languages or language groups of people who spoke English less than "Very Well." Spanish speakers top the ranking with 68.1% of the population among individuals who speak English less than "Very Well."

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the Omaha Region Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less
Spanish or Spanish Creole	25,418	68.1%
Other Asian languages	1,958	5.2%
African languages	1,549	4.2%
Vietnamese	1,440	3.9%
Chinese	1,027	2.8%
French (incl. Patois, Cajun)	989	2.7%
Other Indic languages	878	2.4%

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Arabic	665		1.8%
Other and unspecified	417		1.1%
Persian	315		0.8%
All Other Languages	2,649		7.1%
Omaha Region Workforce Investment Area Total	**36,073**	**100.0%**	

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 12.24% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 8.3% of new WIA participants during PY13 self-identified as Hispanic.

(g) Greater Lincoln Workforce Development Area:

The U. S. Census American Community Survey 2008 - 2013 estimates show that Lincoln Workforce Area has a total of 11,621 individuals who speak English less than "Very Well." The table below displays the languages or language groups of people who spoke English less than "Very Well."

2013 Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the Lincoln Region Workforce Investment Area

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish or Spanish Creole	4,294	35.9%
Vietnamese	2,625	21.9%
Chinese	1,126	9.4%
Arabic	983	8.2%
Other Indo-European	443	3.7%
Other Asian	354	3.0%
Russian	337	2.8%
French (incl. Patois, Cajun)	282	2.4%
Other Slavic	280	2.3%
African languages	212	1.8%
All Other Languages	1,106	8.6%
Lincoln Region Workforce Investment	**10,026**	**100.0%**

2013 U.S. Census Bureau American Community Survey 5-Year Estimates Table B16001

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The initial population assessment by the U.S. Census Bureau indicates the Lincoln Wagner-Peyser service delivery area had a 10.9% increase since 2009 of language groups who spoke English less than "Very Well." Individuals speaking Spanish and Vietnamese are the two most prevalent language groups served by the NDOL Lincoln office.

Information from NEworks for Registered Individuals by Hispanic Ethnicity indicates that 5.68% of registered individuals during PY13 self-identified as Hispanic/Latino. Information from NEworks for Enrolled Individuals by Hispanic ethnicity shows that 11.11% of new WIA participants during PY13 self-identified as Hispanic.

IV. Individuals Self-Identifying as Hispanic, Latino, or of Spanish origin in Nebraska:

Because the majority of limited English speakers speak Spanish, it may be helpful for planning purposes to look at the change in the number of individuals who self-identify as Hispanic, Latino, or of Spanish origin in the state. Overall, the state saw a 77% increase in the number of individuals in this self-identifying category from 2000 to 2010. Since then, according to Census American Community Survey 2010, 2011 and 2012 5-year estimates, the population of individuals who self-identify as Hispanic, Latino, or of Spanish origin has continued to increase, with a 7,579 increase between 2010 and 2011 and a 7,605 increase between 2011 and 2012.

V. Local Office Language Assistance Measures:

Language assistance services are available throughout the State for many languages. NDOL field staff may access these services through coordination with Adult Basic Education English as a Second Language providers (statewide list is attached), local literacy councils, community action agencies, community based organizations (CBOs), and private providers of language assistance which provide specific language assistance such as Spanish, Southeast Asian, African, Sudanese, etc.

Likewise, if a customer enters an NDOL field office with their own interpreter, the OET is accommodating to the customer's desire for their own language interpreter. LEP individuals served by OET staff are responded to in a manner that is respectful and courteous. Staff persons who are contacted either by telephone, written communication, or personal contact will make every effort to provide the necessary language assistance that is required. LEP individuals will receive the same level of service as all customers served by OET.

Brochures, signage, and complaint forms are available in multiple languages in all offices throughout the State. The OET has created an inventory of language assistance resources that are available to NDOL field offices and their customers. Use of these resources ensures that LEP individuals have equitable access to programs operated by the Office of Employment and Training. The OET maintains ongoing efforts to create and provide translation of Equal Employment Opportunity (EEO) brochures, posters, and customer materials.

Assistance may include interpreters, translated versions of NDOL documents/information, referral to English as a Second Language courses, or other appropriate services, which will enable the individual to enter the workforce. Additionally, the OET utilizes the Language Line services, International Communications Inc. professional translation services, and web-based translation applications. Access to the Language Line and International Communications Inc. resources allows for guaranteed translation services if other, on-site resources are not available.

Specific language assistance available at each NDOL local office or American Job Center is as follows:

- Omaha Local Office

Currently the F Street office has one bilingual (Spanish) employment services staff member and one bilingual (Spanish) Disabled Veterans Outreach Program (DVOP) representative to serve veterans. Interpreting services for other languages are available through the Language Line phone service, International Communications Inc., and other community resources. Written material such as application forms, job seeker brochures, and assessment forms are available in Spanish.

- Lincoln Local Office

The Lincoln office utilizes the Language Line or International Communications Inc.in situations where translation assistance is needed. Individuals are welcome to bring in personal translators, such as friends or family members, to assist them in communicating with staff. Language Line or International Communications Inc. is used in all other situations where translation assistance is needed.

- Region 1 Local Offices

Scottsbluff, Alliance Offices:
The Scottsbluff and Alliance offices utilize bilingual staff (Spanish) from the Scottsbluff office for language assistance. Staff may be contacted by telephone, written communication or personal contact. Assistance includes interpretation, translation of NDOL information and referral to ESL. Language Line or International Communications Inc. is used in all other situations where translation assistance is needed.

- Region 2 Local Offices

North Platte Office: The North Platte office has access to the Language Line and International Communications Inc. services. Spanish resources and on-line translation tools, such as Google Translate, are available to assist staff in communicating with non- English speakers.

Lexington Office: The Lexington office maintains a list of community resources that provide language assistance. A Minority Health Center is co-located within the resource center and available to assist the Spanish-speaking customers when needed. Spanish- speaking individuals

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represent the majority of LEP individuals seeking employment as walk-in customers at the Lexington office. Often, LEP individuals in this area bring their own interpreter for assistance. In addition, the language interpretation assistance, Language Line, is used regularly at this office.

- Region 3 American Job Center and Local Office

Grand Island American Job Center: Grand Island American Job Center: Utilizes community resources to assist with interpretations and has access to Language Line and International Communications Inc. services as LEP resources when needed. In addition, Google Translate is used to assist individuals. The Central Region's major language barrier is Spanish. Many of the individuals bring in translators, family members, or friends to assist. In addition, the Grand Island Career Center works with the local Multi-Cultural Coalition office to assist seekers with job posting information, application completion, and information on local job fairs and hiring opportunities. All documents are available in English and Spanish related to DOL programs. In addition, referrals are made to the local ESL classes in coordination with Central Community College.

Hastings Office: Utilizes community resources to assist with interpretations and has access to Language Line and International Communications Inc. services as LEP resources when needed. In addition, Google Translate is used to assist individuals. The Central Region's major language barrier is Spanish. Many of the individuals bring in translators, family members, or friends to assist. All documents are available in English and Spanish related to DOL programs. In addition, referrals are made to the local ESL classes in coordination with Central Community College.

- Region 4 Local Offices

Staff members utilize the Language Line and International Communications Inc. services as LEP resources when needed. Staff may also use free translation websites such as, freetranslation.com and translate.google.com, when face-to-face with a non-English speaking customer. Beatrice, Nebraska City and York staff members refer customers to local ESL classes. Nebraska City has access to bilingual partner staff working at the Nebraska City Center for Children and Families. The Director for Nebraska City Center for Children and Families may assist with interpreting if necessary.

- Region 5 Local Offices

Norfolk Office: On a limited basis, the Norfolk office utilizes bilingual staff from the Columbus office when interpretation services are needed. The Language Line and International Communications Inc. services are used when a translator is not available. NDOL staff refers job seekers to ESL classes, which are held at NECC in Norfolk & O'Neill, at the South Sioux City Library, Student Center at Wayne State, and at area faith-based organizations. Staff also utilize free translation websites such as BabelFish.com & translate.google.com.

Columbus Office: The Columbus office has a staff person who is bilingual in Spanish/English and

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provides interpretation and/or translation services related to employment services on a daily basis. The Language Line and International Communications Inc. services along with Proteus, Inc. (Migrant/Seasonal Farmworker Program staff) are used when a translator is not available. NDOL staff refers job seekers and applicants to Platte Valley Literacy Association (PVLA), a nonprofit organization which offers ESL classes in coordination with Central Community College (CCC).

Cargill Meat Solutions, in Schuyler, NE has an on-site learning center that offers, ESL, GED, computer classes and tutoring programs. Cargill Added Value Meat Solutions, in Columbus, NE also offers ESL and GED classes in an effort to help LEP individuals increase their English language skills. The Columbus Office also works with Centro Hispano Comunitario, which offers computer, ESL and citizenship classes. English classes are also offered at local faith-based organizations.

Both the Norfolk and Columbus offices have multiple brochures explaining services available, along with materials and applications available in Spanish.

- Virtual Services Unit

The Virtual Services Unit (VSU) provides email and telephone assistance to LEP job seekers, including assistance with website navigation, password changes, and contact information for the Unemployment Insurance call center. The VSU has bilingual staff members who speak Spanish, Serbo-Croatian, Bosnian, Kurdish, and Arabic. Requests are generated from helpdesk referrals and other internal sources. The Language Line and International Communications Inc. services are used when a translator is not available.

VI. Accessibility of Information Online to LEP Individuals

a. NEworks

NEworks is the labor exchange, case management and reporting site for the OET programs. At this time, the only available language for NEworks is English. NEworks is accessible at https://neworks.nebraska.gov/vosnet/Default.aspx.

b. NDOL Website

The NDOL public website provides information for workers and employers. This includes information about job searching, training, the Workforce Investment Act, and many additional programs and services. The NDOL site is accessible at http://www.dol.nebraska.gov/index.cfm.

The site features the option of selecting language translation services provided via Google Language Tools. The translation through Google utilizes an automated/computerized translation which serves as an approximation for the site's original content. NDOL has provided a Translation Disclaimer Statement indicating potential issues with the automated translation process. Available languages listed on the NDOL site include: Spanish, Chinese, French, German, Italian, Korean, Russian, Polish, Arabic, Portuguese, Japanese, and Norwegian. The NDOL website

provides information on how to contact local field staff for additional assistance.

c. Social Media

OET utilizes multiple social media platforms in order to improve and increase its public outreach. The social media platforms used include Facebook (http://www.facebook.com/Nebraska.DOL), Twitter (http://twitter.com/NE_DOL), and YouTube (http://www.youtube.com/user/NEDeptOfLabor).

At this time, all information published to social media platforms is published exclusively in English.

VII. Accessibility of Rapid Response Information to LEP Individuals

OET manages Nebraska's Rapid Response activities as the designated Dislocated Worker Unit. Rapid Response provides assistance to workers who are dislocated due to plant closures and substantial layoffs, and is a required activity under the Workforce Investment Act (WIA).

Rapid Response meetings provide information to dislocated workers about American Job Center services, WIA training activities, Trade Adjustment Assistance, Unemployment Insurance benefits, LMI, financial counseling, federal financial assistance, and many other job-seeker services and programs. Many of the printed information guides disseminated during Rapid Response meetings are available in Spanish. Translation assistance is provided at Rapid Response events upon request.

VIII. Training Staff:

Training on serving individuals with LEP needs will be conducted by the OET for staff. The OET LEP Coordinator, in conjunction with the agency monitor and the Equal Opportunity (EO) Officer or designee will coordinate, schedule and implement statewide training. LEP training will be conducted every two years, with the training materials and topics being coordinated with the EO Officer or designee. Additional training sessions will be conducted via LiveMeeting alerting staff to any major changes necessitating alterations to the LEP plan that would directly influence daily activities. Likewise, training materials and tools are shared with staff through meetings and emails as the OET or the LEP committee becomes aware of them. Some of these items include but are not limited to resources such as, I Speak Cards, free website translations services, federal initiatives and tools, Nebraska's Non-English Speaking Worker's Protection Act (Neb. Rev. Stat. § 48-2207 to 48-2214), U.S. Census data, and a translatable glossary of workforce terms.

The content, details and topics of training will be determined based upon the need across the state, recommendations by staff and also by the EO officer, as well as budget constraints.

The OET continues to implement the practice of requiring bilingual skills to be part of the hiring practice. This has become a desired skill listed on most OET job announcements across the state. Applicants are not screened out if they do not have bilingual skills; however, it is desirable if

bilingual skills are present in an applicant, as the OET strives to hire qualified candidates who possess bilingual skills in order to ensure access to services for LEP customers.

Worker Training Grants

June 2013 through June 2014 Worker Training Grants Funded

Type of Training	Number of Workers Trained	Grant Amount	Number of Grants
Spanish	83	$10,400	1
Safety Grant (conducted in Spanish)	10	$1,000	1
English as a Second Language	106	$12,542	2
June 2013 – June 2014	**199**	**$23,942**	**4**

IX. Dissemination of OET's LEP Plan

The OET LEP Plan may be assessed on the NDOL website, under the State of Nebraska Five-Year Integrated Workforce Plan, accessible at http://www.dol.nebraska.gov/center.cfm?PRICAT=3&SUBCAT=8F.

X. LEP Complaint Procedures

If you think you have been subjected to discrimination involving LEP, Title VI, and related statutes please contact the Nebraska Equal Opportunity Commission at (402) 471-2024 or 1 (800) 642-6112. If you think that you have been subjected to discrimination under a WIA Title I financially-assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with:

Terri Sloan
EO Officer
Nebraska Department of Labor
550 S. 16th Street
P.O. Box 94600 Lincoln, NE 68509-4600
(402) 471-8358 TDD (800) 833-7352

Appendices

Appendix A: OET Bilingual Staff List
Appendix B: 2015 Nebraska Adult Education Providers Appendix C: Language Line Services Quick Reference Appendix D: Language Line Services Language List Appendix E: International Communications Inc. Instructions
Appendix F: International Communications Inc. Agreement Amendment

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Appendix A

BILINGUAL STAFF LIST

Region 1
Scottsbluff: Lori Marquez, Spanish
Mary Hinojosa, Spanish

Region 2
Currently there are no bilingual NDOL employees in Region 2.

Region 3
Currently there are no bilingual NDOL employees in Region 3.

Region 4
Currently there are no bilingual NDOL employees in Region 4.

Region 5
Columbus: Ada Sanchez, Spanish

Lincoln
Currently there are no bilingual NDOL employees at the Lincoln local office.

Omaha
F Street: Abelino Ortiz, Spanish
Nina Rogers, Spanish Tatyana
Kolesnikova, Russian Omar Correa,
Spanish

Virtual Service Unit
Dina Mekic: Serbo-Croatian, Bosnian
Federico Torres, Spanish
Joel Roos, Spanish
Karez Hassan, Kurdish, Arabic Pablo
Colindres, Spanish

Other Resources:

- The Department of Labor Office of Employment and Training utilizes the Language Line service for interpretation.
- International Communications Inc. provides fee-based translation and interpretation services including phone support for over 240 languages, print

translation, on-site services and desktop publishing and HTML translations.

- The staff of partner agencies located at the local offices and American Job Centers also provide translation assistance to clients. Partner agencies include; Community Action Agency, and Proteus, INC.

Appendix B

NEBRASKA DEPARTMENT OF EDUCATION

Nebraska Adult Education Directors

PO Box 94987 ▪ Lincoln, NE 68509 ▪ Phone: 402/471-2295 ▪ Fax: 402/471-8127

Vicki Bauer, Director 402/471-4807 vicki.l.bauer@nebraska.gov	Jim Lukesh, Consultant 402/471-4806 jim.lukesh@nebraska.gov	Julie Katt, Program Specialist 402/471-4826 julie.katt@nebraska.gov	Jan Drbal, Professional Assistant 402/471-4830 jan.drbal@nebraska.gov

Alliance Public Schools Learning Center Library, Rm. 9 (EL/Civics) 616 Black Hills Avenue	**John Miller**, Director and Lead Instructor 1604 Sweetwater Alliance, NE 69301	Phone: 308/760-7986 FAX: 308/762-8249 E-mail: jwmiller@bbc.net; jmiller@apschools.org
Bellevue Public Schools Adult Learning Center	**Maureen McNamara**, Director 2820 Arboretum Drive Bellevue, NE 68005 Debbie Bose, Office Assistant	Phone: 402/293-4020 FAX: 402/291-2046 E-mail: maureen.mcnamara@bpsne.net Phone: 402/293-5026 E-mail: Deborah.bose@bpsne.net
Central Community College Area	**Ann Chambers**, Director PO Box 4903 Grand Island, NE 68802-4903	Phone: 308/398-7446 1/877-222-0780 X7446 FAX: 308/398-7446 E-mail: achambers@cccneb.edu
Crete Public Schools	**Diane Bruha**, Director (10/1/14) 920 Linden Crete, NE 68333	Phone: 402/826-7898 FAX: 402/826-5120 E-mail: dianeb@creteschools.org
Literacy Center Omaha	**Kirsten Case**, Executive Director Literacy Center for the Midlands 1823 Harney St., Suite 204 Omaha, NE 68102 **Pierre Sagitteh**, Program Director	Phone: 402/342-7323 FAX: 402/345-9045 Website: www.midlandsliteracy.org E-mail: kcase@midlandsliteracy.org E-mail: psagitteh@midlandsliteracy.org
Mid-Plains Community College Area	**Robin Rankin**, Director 1101 Halligan Drive North Platte, NE 69101	Phone: 308/535-3637 or 1-800-658-4308 FAX: 308/535-3689 E-mail: rankinr@mpcc.edu
Nebraska Department of Correctional Services	**Mark Wentz**, Director PO Box 94661 Folsom & W. Prospector Pl Lincoln, NE 68509-4661	Phone: 402/479-5545 Cell: 402/405-3435 FAX: 402/479-5623 E-mail: mark.wentz@nebraska.gov
Northeast Community College	**Nancy Schultz**, Director 801 East Benjamin Avenue PO Box 469 Norfolk, NE 68702-0469 **Emily Duncan**, AE Coordinator	Phone: 402/844-7254 FAX: 402/844-7400 Office Phone: 402/844-7255 E-mail: nancyjs@northeast.edu; Phone: 402/844-7253 E-mail: emily@northeast.edu
Omaha Metropolitan Community College	**Sue Raftery**, Director Building 9, Room 108 PO Box 3777 Omaha, NE 68103	Phone: 402/457-2312 FAX: 402/457-2655 E-mail: sraftery@mccneb.edu

Plattsmouth Community Schools	**Tallie VanWesten**, Director 1912 East Highway 34 Plattsmouth, NE 68048	Phone: 402/296-3174 X2315 FAX: 402/296-2910 E-mail: tvanwesten@pcsd.org
Southeast Community College – Beatrice	**Tate Lauer**, Director 4771 West Scott Road Beatrice, NE 68310-7042	Phone: 402/228-3468 X1345 FAX: 402/228-2897 E-mail: tlauer@southeast.edu
Southeast Community College – Lincoln	**Diane Vesely Robb**, Director 8800 "O" Street Lincoln, NE 68520 **Susan Kash-Brown** ESL, Assistant Director	Phone: 402/437-2717 FAX: 402/437-2704 E-mail: dveselyrobb@southeast.edu Phone 402/437-2722 E-mail: skash-brown@southeast.edu
Western Nebraska Community College – Scottsbluff	**Mary Kay Versen**, Director 1601 E. 27th Street Scottsbluff, NE 69361	Phone: 308/635-6769 or 1/800-348-4435 FAX: 308/635-6055 E-mail: versenm@wncc.edu
York Public Schools York Middle School	**Brian Tonniges**, Director **Jane VanderTuig**, Lead Teacher York Community Education 1730 N. Delaware York, NE 68467	Phone: 402/362-6655, #1 X363 FAX: 402/362-5488 E-mail: brian.tonniges@yorkdukes.org E-mail: jane.vandertuig@yorkdukes.org

Appendix C

Quick Reference

When receiving a call:

1. Use Conference Hold to place the non-English speaker on hold.
2. Dial 1-800-874-9426.
3. Enter the 6-digit Client ID: 535010
   Organization Name: State of Nebraska Department of Labor
   Personal Code: 7 Digit Phone Number
4. Press 1 for Spanish
   Press 2 for all other languages
   Press 0 to stay on the line for assistance.
5. Brief the interpreter. Summarize what you wish to accomplish and give any special instructions.
6. Add the non-English speaker to the line.

When placing a call to a non-English speaker:

1. Dial 1-800-874-9426.
2. Enter the 6-digit Client ID: 535010
   Organization Name: State of Nebraska Department of Labor
   Personal Code: 7 Digit Phone Number
3. Press 1 for Spanish
   Press 2 for all other languages
   Press 0 to stay on the line for assistance.
4. Brief the interpreter. Summarize what you wish to accomplish and give any special instructions.
5. Add the non-English speaker to the line.

There Are 3 Ways You Can Use Language Line® Over-the-Phone Interpretation Service With Limited English Speakers

Note: Depending on your organization's requirements, the following process may be somewhat different. If you have any questions please contact your account manager or **Customer Service** at **1-800-752-6096, Option 2.**

You Receive a Call From a Limited English Speaker

- Place the Limited English Speaker on conference hold.
- Dial the Language Line Services designated toll-free number you have been provided at sign-up.
- Request the language your caller speaks through our easy-to-use interactive voice response (IVR) system.
- When the interpreter is connected, explain the situation.
- Conference in your limited English-speaking caller.

You Need to Make a Call to a Limited English Speaker

- Dial the Language Line Services designated toll-free number.
- Request the language your client speaks through our easy-to-use interactive voice response (IVR) system.
- When the interpreter is connected...
- Call your limited English-speaking client...
- Or the interpreter can place the call for you within the U.S. or Canada.

You Are Face-to-Face With a Limited English Speaker

- Dial the Language Line Services designated toll-free number.
- Request the language your client speaks through our easy-to-use interactive voice response (IVR) system.
- When the interpreter is connected, use the Language Line® Phone, or your speakerphone, or pass your handset back and forth.

If you have any questions about how telephone interpretation works, please contact your account manager or Customer Service at 1-800-752-6096, Option 2.

Appendix D

Language Line Services **Language List**

These languages represent approximately 98.6% of all customer requests from the 6,809 languages spoken in the world today. Depending on the availability of qualified interpreters, particularly in rarely requested languages, this list is subject to change and may not match the list you find at www.languageline.com/languages. If you do not see the language you need, please contact your account representative or customer service at wecare@languageline.com to determine if an interpreter is currently available.

We also offer American and Mexican Sign Language through our video interpretation solutions.

Afrikaans
Akan
Albanian
Amharic
Arabic
Armenian
Ashante
Asl
Assyrian
Azerbaijani
Azeri
Bajuni
Bambara
Basque
Behdini
Belorussian
Bengali
Berber
Bosnian
Bravanese
Bulgarian
Burmese
Cambodian
Cantonese
Catalan
Chaldean
Chamorro
Chao-chow
Chavacano
Chin
Chuukese
Cree
Croatian
Czech
Dakota
Danish
Dari
Dinka
Diula
Dutch
Estonian
Ewe
Fante
Farsi
Fijian Hindi
Finnish
Flemish
French
French Canadian
Fukienese
Fula
Fulani
Fuzhou
Ga
Gaddang
Gaelic
Gaelic - Irish
Gaelic - Scottish
German
Gorani
Greek
Gujarati
Haitian Creole
Hakka
Hakka - Chinese
Hassaniyya
Hausa
Hebrew
Hindi
Hmong
Hungarian
Ibanag
Ibo
Icelandic
Igbo
Ilocano
Indonesian
Inuktitut
Italian
Jakartanese
Japanese
Javanese
Kanjobal
Karen
Kashmiri
Kikuyu
Kinyarwanda
Kirundi
Korean
Kosovan
Kotokoli
Kpelle
Krio
Kurdish
Kurmanji
Lakota
Laotian
Latvian
Lingala
Lithuanian
Luganda
Luo
Lusoga
Luxembourgeois
Maay
Macedonian
Malagasy
Malay
Malayalam
Maltese
Mandarin
Mandingo
Mandinka
Marathi
Marshallese
Mien
Mina
Mirpuri
Mixteco
Moldavan
Mongolian
Montenegrin
Navajo
Neapolitan
Nepali
Nigerian Pidgin English
Norwegian
Nuer
Oromo
Pahari
Pampangan
Pashto
Patois
Pidgin English
Polish
Portuguese
Portuguese Creole
Pothwari
Pulaar
Punjabi
Putian
Quichua
Romanian
Russian
Samoan
Sango
Serbian
Shanghainese
Shona
Sichuan
Sicilian
Sindhi
Sinhalese
Slovak
Slovenian
Somali
Soninke
Sorani
Spanish
Sudanese Arabic
Sundanese
Susu
Swahili
Swedish
Sylhetti
Tagalog
Taiwanese
Tajik
Tamil
Telugu
Thai
Tibetan
Tigre
Tigrinya
Toishanese
Tongan
Toucouleur
Tshiluba
Turkish
Twi
Ukrainian
Ulster- Scotts
Urdu
Uyghur
Uzbek
Vietnamese
Visayan
Wolof
Yiddish
Yoruba
Yupik

Language Line services

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Appendix E

International Communications Inc.
Cellular: 402-432-8671 Translation and Interpretation Interactive Voice Response 877-650-8013
Email: info@icitranslation.com Website:
icitranslation.com

HOW TO USE INTERACTIVE VOICE RESPONSE (IVR)

Step 1: Call **1-877-650-8013**

Step 2: Enter your access code, followed by # sign

Step 3: Select 1 to be connected directly to a Spanish interpreter
Select 9 for all other languages

(Make sure that you tell them the name of the place/hospital/clinic you are calling from)

IVR FAQ

What if I do not know my access code?
You do need this information in order to reach the interpreter directly. Please call ICI, Inc. to get your access code.

What is IVR?
IVR stands for Interactive Voice Response. IVR system allows a customer to quickly select the language desired for interpretation and to be connected immediately to an interpreter without interaction with a live attendant. The benefit of this is an even faster connect time to your interpreter and better service to your limited English proficient (LEP) client**.**

What is a 3rd party call?
A 3rd party call is when you need ICI, Inc. to call the LEP client then bridge the call together with you and the interpreter**.**

How do I make a 3rd party call with ICI, Inc.?
If you need a 3rd party call, **press 9 (even for Spanish**) to reach a Customer Services Representative (CSR) and let the operator know you need a 3rd party call. We are happy to assist you with this at no additional charge. ***Our interpreters are not able to make the 3rd party call directly.***

I need a Hindi interpreter. How do I get a Hindi interpreter on the line?
Press 9 for other languages and let the CSR know that you need a Hindi interpreter and they will connect you**.**

Cost

Only $1.35/minute. Once you are connected to the interpreter your charges start in 1 minute increments. There is no monthly minimum charge or activation fee.

Information needed when placing a call:
Your access code, name of the place/hospital/clinic you are calling from, your name, language needed, and male/female interpreter.

On-Site Interpreters
This is still done by using our scheduling system or by calling 402-432-8671 or 402-679-6627 (for Omaha clients)

Please contact us if you have any further questions or if you experience any problems.
402-432-8671 or 402-679-6627 (Omaha), or by email: info@icitranslation.com

Appendix F

NDOL Contract #023-0006-2012

AMENDMENT To AGREEMENT
Between
NEBRASKA DEPARTMENT OF LABOR
And
INTERNATIONAL COMMUNICATIONS, INC.

Rapid Response Interpreter & Translation Services

THE AGREEMENT entered into on February 1, 2012 between the Nebraska Department of Labor (NDOL), 550 South 16th Street, Lincoln, Nebraska 68508, and International Communications, Inc. (ICI), 2166 Magnum Circle, Ste. 3, Lincoln, NE 68522 is amended as follows:

1. **Paragraph II - Funding/Payment is changed to reflect current rates:**

II - Funding Payment

A. For said services, the NDOL agrees to pay ICI as set forth in *Attachment A*.

B. For services rendered outside a city in which ICI maintains an office, NDOL will pay ICI for travel time at the billing rate stated above and reimburse ICI for actual miles driven at the current State rate.

C. ICI shall itemize and submit a written statement for actual expenses to the NDOL Authorized Representative in ¶XIII, below. ICI must provide receipts for all expenses claimed.

D. Total expenditures under this Agreement will not exceed Five Thousand Dollars ($5,000.00).

E. It is understood that performance must be done to the satisfaction of the NDOL and that no payment shall become due and owing until such time as the NDOL's authorized representative has verified, reviewed, and approved ICI's services.

F. This Agreement will terminate in full or in part at the discretion of the NDOL in the event the NDOL suffers a loss of funding or termination of federal funds which permits it to fund this Agreement. In that event, payment shall be made only for services rendered and completed at the termination of the Agreement.

2. **Paragraph IV - Term of Agreement is amended to extend this Agreement through January 31, 2017.**

There are no other changes to this Agreement.

[signature page to follow]

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NDOL Contract #023-0006-2012

1-29-15
Date

JOHN H. ALBIN, Commissioner
Nebraska Department of Labor

1-27-2015
Date

JERRY PELANZ, Owner
International Communications, Inc.

REVIEWED AND APPROVED:

KIM SCHREINER, Controller
Nebraska Department of Labor
Date 1/28/15

JOAN MODRELL, E&T Director
Nebraska Department of Labor
Date 1/28/15

THOMAS A. UKINSKI, Acting General Counsel
Nebraska Department of Labor
Date 01/28/2015

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Page 2 of 2