

**Combined State Plan for Nebraska's Workforce System
Program Years 2020 – 2023
(July 1, 2020 – June 30, 2024)**

Public Comments and Plan Partner Responses

The Nebraska Departments of Education, Health and Human Services, and Labor and the Nebraska Commission for the Blind and Visually Impaired released a draft of the Combined State Plan for public comment, as required under the Workforce Innovation and Opportunity Act. The Combined State Plan was published on January 30, 2020 and accessible at <https://tinyurl.com/NebraskaStatePlan>. Public comment on the draft was requested for the 30-day period beginning January 30, 2020 and ending February 29, 2020. Comments on the draft plan were accepted by email submitted ndol.wioa_policy@nebraska.gov or in writing to the attention of the State WIOA Team, Office of Employment and Training, Nebraska Department of Labor, 550 South 16th Street, Lincoln, NE 68508. Comments were also accepted during a public hearing held on February 10, 2020 at 2p CST at the Nebraska VR Program offices located at 3901 North 27th Street, Lincoln, NE 68521. This hearing was broadcast simultaneously at the following Nebraska VR Program locations across the state through interactive video conferencing:

- 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

Comments received are listed in Table 1, along with plan partner responses.

Table 1. Public comments and plan partner responses

Commenter and topic	Comment	Response to comment
<i>Commenter:</i> Dr. Wayne Stuber, Munroe-Meyer Institute for Genetics and Rehabilitation <i>Topic:</i> Labor availability, Section II.a.1.B.i	Commenter stated that hourly rates and salary levels in the labor availability section seem contradictory.	Plan partners will revise the section to clarify.
<i>Commenter:</i> Dr. Wayne Stuber, Munroe-Meyer Institute for Genetics and Rehabilitation <i>Topic:</i> Underutilization, Section II.a.1.B.i	Commenter asked if the discussion of labor underutilization included information about underutilization of individuals with disabilities, including cognitive disabilities.	Plan partners will include information in the section regarding utilization of individuals with disabilities within Nebraska's workforce.

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<i>Commenter:</i> Dr. Wayne Stuber, Munroe-Meyer Institute for Genetics and Rehabilitation <i>Topic:</i> State's Workforce Development Activities, Analysis, Section II.a.2.A	Commenter stated that the analysis does not mention programming for individuals with disabilities.	Plan partners will revise the section to define the basic and individualized career services provided by the plan partners through the one-stop delivery system, all of which are physically and programmatically accessible to individuals with disabilities, including employers, as required under the Workforce Innovation and Opportunity Act.
<i>Commenter:</i> Dr. Wayne Stuber, Munroe-Meyer Institute for Genetics and Rehabilitation (MMI) <i>Topic:</i> Key weaknesses, Section II.a.2.B	Commenter asked if a key weakness is the differential in unemployment rates between individuals with disabilities and able-bodied individuals.	Plan partners acknowledge the difference between employment rates for individuals with disabilities and those without disabilities all over the United States, including Nebraska. Plan partners will continue to work on eliminating such difference.
<i>Commenter:</i> Nebraska Department of Labor <i>Topic:</i> State Board Functions, Section III.a.1	Commenter stated that the description of the subcommittees of the Nebraska Workforce Development Board is outdated.	The section will be revised to reflect the current subcommittee structure.
<i>Commenter:</i> Nebraska Department of Labor <i>Topic:</i> Title IB adult, dislocated worker, and youth programs, Section III.a.2.A	Commenter stated that the description of program activities should reflect basic and individualized career services, training services, and employer services provided by the programs.	The section will be revised to reflect basic and individualized career services, training services, and employer services provided by the programs.
<i>Commenter:</i> Nebraska Department of Labor <i>Topic:</i> Assessment and evaluation of programs and one-stop program partners, Section III.b.4	Commenter suggested the section be revised and agreed during a state plan stakeholder meeting on January 16, 2020.	This section will be revised as agreed.
<i>Commenter:</i> Nebraska Commission for the Deaf and Hard of Hearing <i>Topic:</i> Accessibility of the one-stop delivery system for individuals with disabilities, Section III.b.8	Commenter suggested revisions to Table 32, Physical Accessibility Criteria, regarding equal opportunity access and Table 33, Programmatic Accessibility Criteria regarding equal access and accommodations.	Tables will be removed as agreed during a state plan stakeholder meeting on January 16, 2020. The tables were mistakenly included in the draft plan.
<i>Commenter:</i> Nebraska Commission for the Deaf and Hard of Hearing <i>Topic:</i> Disability etiquette training, Section III.b.8	The Nebraska Commission for the Deaf and Hard of Hearing welcomes the opportunity to partner with the Nebraska VR Program and the Nebraska Commission for the Blind and Visually Impaired to develop disability sensitivity training specific to providing effective communication and technology accommodations.	The Nebraska VR Program and the Nebraska Commission for the Blind and Visually Impaired will consult with the Nebraska Commission for the Deaf and Hard of Hearing when preparing to update and deliver disability etiquette training for local one-stop centers.
<i>Commenter:</i> Nebraska Commission for the Deaf and Hard of Hearing	Commenter stated that the deaf and hard of hearing population should be placed under the Nebraska VR Program's Priority Group 1 given the impact of their disability if they have challenges with both hearing	<i>Order of selection</i> is a process for prioritizing eligible individuals that a vocational rehabilitation (VR) agency intends to serve based on available funds. A VR agency can seek approval from the Rehabilitation

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<p><i>Topic:</i> Order of selection, Section VI, Program-specific requirements for vocational rehabilitation programs (combined or general)</p>	<p>and speaking, or with hearing alone, and rely on alternative accommodations when unable to decipher speech with their better ear.</p>	<p>Services Administration (RSA) to implement an order of selection when it does not have enough money or staff to serve everyone who is eligible. The Workforce Innovation and Opportunity Act requires individuals with the most significant disabilities be served first. Once an individual is determined eligible for VR services, the individual's severity level is determined based on Priority Groups 1 through 3. Priority Group 1 covers eligible persons with the most significant disabilities. Significance of disability and priority group assignment are not based on the disability type. Instead, significance is determined after reviewing medical records, assessment reports, and determining ability to complete work related tasks. Work-related tasks are categorized into seven functional capacity areas:</p> <ol style="list-style-type: none"> 1. communication; 2. mobility; 3. self-direction; 4. work tolerance; 5. interpersonal skills; 6. self-care; and 7. work skills. <p>This process is consistent with federal regulations.</p>
<p><i>Commenter:</i> Black Hills Works <i>Topic:</i> Job-referral process</p>	<p>Commenter remarked on the Nebraska VR Program's process for referring individuals with disabilities to Black Hills Works regarding job openings. (Comment offered not relevant to the state plan content and relates to a specific interagency relationship.)</p>	<p>Nebraska VR Program response: The Nebraska VR Program has reviewed wording in the State Plan and reviewed its policies and procedures. The Nebraska VR Program policy manual will be updated to include specific processes Nebraska VR currently has in place to refer individuals and determine competitive integrated employment on a case-by-case basis.</p>