REQUEST FOR PUBLIC COMMENT WIOA Combined State Plan

The Workforce Innovation and Opportunity Act (WIOA) requires the Governor of each state to submit either a Unified or Combined State Plan outlining a four-year strategy for the state's workforce development system. At a minimum, states are required to modify their state plan every two years to reflect changes in labor market and economic conditions; state negotiated levels of performance, the state's vision, goals, or workforce priorities, or any other factors affecting implementation of the state plan. The most recent modification to the state plan was submitted in April of 2018 and received final approval in June 2018.

The South Carolina WIOA State Partners participating in the development of the PYs 2020 – 2023 Combined State Plan include the Department of Education's Adult Education Office, the Vocational Rehabilitation Department, the Commission for the Blind, Department of Employment and Workforce, and Department of Social Services, representing the following programs covered within the plan:

- Adult, Dislocated Worker, and Youth
- Adult Education and Family Literacy Act
- Wagner-Peyser Act ES
- Vocational Rehabilitation
- Jobs for Veterans State Grant
- Supplemental Nutrition Assistance Program Employment & Training
- Temporary Assistance for Needy Families
- Trade Adjustment Assistance

The WIOA Combined Plan includes the following key sections, which makeup the Common Elements of the plan:

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination.

Following the Common Elements, you will find program-specific plans for each of the partner programs listed above (except Trade Adjustment Assistance).

The plan must be submitted to federal authorizing agencies on or before April 1, 2020. The Secretaries of Labor and Education have 90 days from the date the plan is submitted to approve the plan. States must have an approved plan in place to receive funding for the core programs.

The state is requesting comment on the WIOA Combined State Plan. The review and public comment period will close on <u>Wednesday, March 11th at 5:00 P.M. EST.</u> Please submit your comments electronically to WorkforceGrants@dew.sc.gov.



DRAFT SC WIOA STATE PLAN PYs 2020-2023

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I. WIOA STATE PLAN TYPE

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

South Carolina is submitting a Combined State Plan covering the six WIOA core programs and a number of WIOA required programs:

WIOA Core Programs

- the Adult, Dislocated Worker, and Youth programs,
- the Wagner-Peyser program,
- the Adult Education and Family Literacy Act program, and
- the Vocational Rehabilitation program.

WIOA Required Programs

- Temporary Assistance for Needy Families Program,
- Employment and Training programs under the Supplemental Nutrition Assistance Program,
- Trade Adjustment Assistance for Workers programs, and
- Jobs for Veterans State Grants Program.

II. STRATEGIC PLANNING ELEMENTS

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

ECONOMIC AND WORKFORCE ANALYSIS

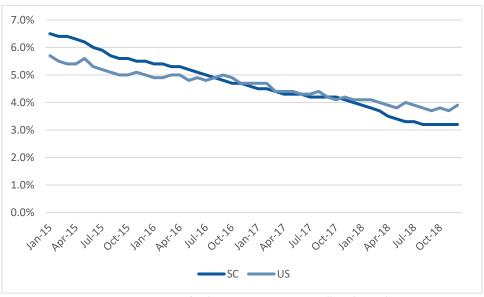
The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the state's workforce system and programs will operate.

- (A) Economic Analysis. The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the state, including sub-state regions and any specific economic areas identified by the state. This must include—
 - (i) Existing Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which there is existing demand.
 - (ii) Emerging Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which demand is emerging.
 - (iii) Employers' Employment Needs. With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.
- (B) Workforce Analysis. The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA. This population must include individuals with disabilities among other groups in the state and across regions identified by the state. This includes—
 - (i) Employment and Unemployment. Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the state.
 - (ii) Labor Market Trends. Provide an analysis of key labor market trends, including across existing industries and occupations.
 - (iii) Education and Skill Levels of the Workforce. Provide an analysis of the educational and skill levels of the workforce.
 - (iv) Skill Gaps. Describe apparent 'skill gaps'.

UNEMPLOYMENT, EARNINGS, AND GROSS DOMESTIC PRODUCT

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

FIGURE 1: S.C. AND U.S. UNEMPLOYMENT RATE, 2015-2018

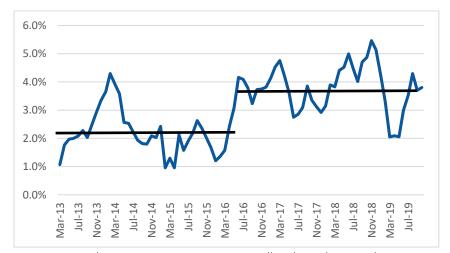


Source: Bureau of Labor Statistics, Seasonally Adjusted

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

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

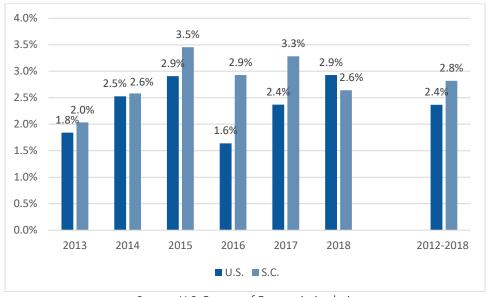
FIGURE 2: S.C. TOTAL PRIVATE AVERAGE HOURLY EARNINGS GROWTH



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

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

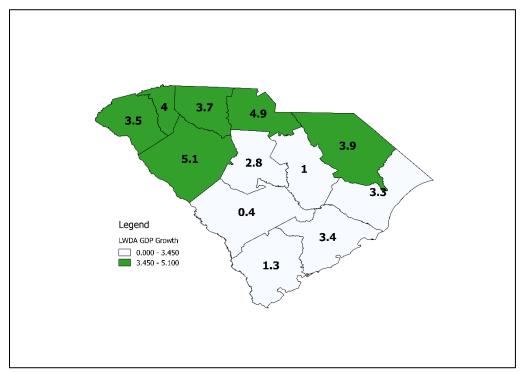
FIGURE 3: U.S. VS. S.C. GDP GROWTH



Source: U.S. Bureau of Economic Analysis

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

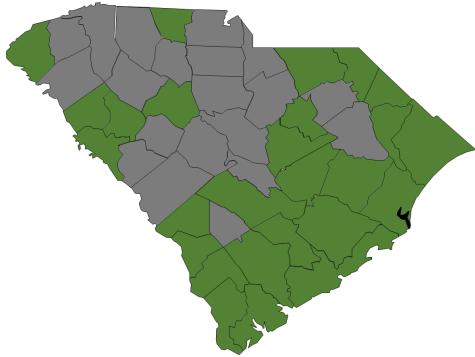
FIGURE 4: LOCAL AREA GDP GROWTH, 2014-2015



Source: U.S. Bureau of Economic Analysis

More recent data at the local level is available for both employment and wage growth. As anticipated, areas of the state that have typically relied more heavily on manufacturing did not experience as much employment growth between 2017 and 2018. Areas in Figure 5 shaded in dark green represent counties with employment growth rates faster than the state average. Between December 2017 and December 2018 only one county in the state, Bamberg, saw employment declines. The coastal communities continued to experience stronger than average employment growth as the service industry, particularly leisure and hospitality related jobs, continued to experience high demand.

FIGURE 5: EMPLOYMENT GROWTH, 2017-2018



Source: Local Area Unemployment Statistics, Non-Seasonally Adjusted

In terms of average annual earnings growth, the major metropolitan areas of the state have experienced the greatest levels of growth since 2015. Figure 6 provides the average hourly earnings by Metropolitan Statistical Area (MSA) for both December 2015 and 2018. The highest overall wages in the state occur in the Charlotte and Charleston metro areas followed by Spartanburg and Augusta. The Myrtle Beach and Sumter MSAs typically have the lowest average wages among all metro areas.

FIGURE 6: AVERAGE HOURLY EARNINGS, ALL PRIVATE EMPLOYEES, DEC 2015 & 2018

MSA	December 2015	December 2018	2015-2018 Annualized	MIT Living Wage
			Growth	Estimate ¹
Augusta	\$23.09	\$24.14	+1.5%	\$26.78/\$14.73
Charleston	\$23.33	\$27.02	+5.0%	\$27.34/\$15.02
Charlotte	\$25.76	\$29.25	+4.3%	\$28.43/\$15.55
Columbia	\$22.66	\$23.45	+1.1%	\$26.29/\$14.50
Florence	\$18.75	\$21.67	+4.9%	\$25.25/\$13.98
Greenville	\$20.98	\$23.88	+4.4%	\$25.76/\$14.23
Hilton Head	\$20.40	\$22.43	+3.2%	\$27.29/\$15.00
Myrtle Beach	\$19.50	\$20.30	+1.3%	\$26.52/\$14.61
Spartanburg	\$20.55	\$25.00	+6.8%	\$25.31/\$14.01
Sumter	\$19.56	\$21.27	+2.8%	\$25.51/\$14.11
Statewide—S.C.	\$21.67	\$24.51	+4.2%	\$26.09/\$14.40

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

Although wage growth has been more positive in recent years, many families in the state still experience average hourly earnings that are less than what is considered a "living wage." The Massachusetts Institute of Technology has developed a living wage calculator for each state to estimate the cost of living in a particular community or region based on typical expenses. The living wage differs based on household composition, but assuming one working adult and two children, the estimated living wage in South Carolina is \$26.09/hour. The living wage estimates by MSA are shown in Figure 6. In the majority of MSAs the average hourly wage for one working adult with two children is insufficient to cover typical expenses.

LABOR FORCE PARTICIPATION

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

FIGURE 7: LABOR FORCE PARTICIPATION RATES, 2008-2018

Source: Bureau of Labor Statistics, Seasonally-Adjusted

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

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FIGURE 8: LABOR FORCE PARTICIPATION RATES, 2013-2017

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

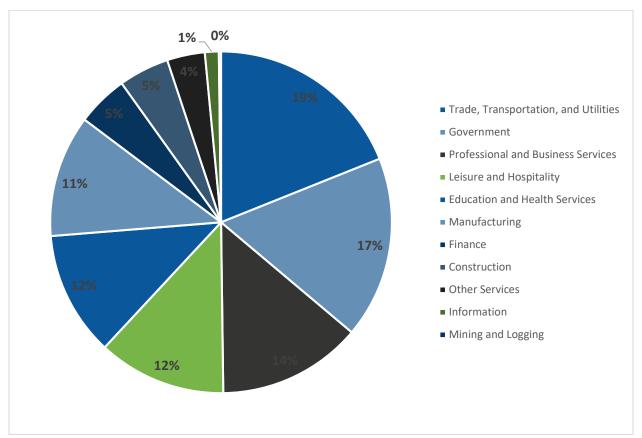
CURRENT AND FUTURE EMPLOYMENT BY INDUSTRY

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

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

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

FIGURE 9: SOUTH CAROLINA NON-FARM INDUSTRY EMPLOYMENT, 2018



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

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

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

FIGURE 10: S.C. INDUSTRY EMPLOYMENT PROJECTIONS

Industry Code	Industry Title	Estimated 2016 Employment	Projected 2026 Employment	Numeric Change	Percent Change
000000	Total All Industries	2,072,388	2,318,285	245,897	11.9%
110000	Agriculture, Forestry, Fishing and				
	Hunting	38,073	33,505	-4,568	-12.0%
210000	Mining	1,461	1,421	-40	-2.7%
220000	Utilities	12,377	12,463	86	0.7%
230000	Construction	94,341	106,713	12,372	13.1%

Industry	Industry Title	Estimated 2016	Projected 2026	Numeric	Percent
Code		Employment	Employment	Change	Change
310000	Manufacturing	238,195	250,200	12,005	5.0%
420000	Wholesale Trade	71,774	81,378	9,604	13.4%
440000	Retail Trade	246,756	266,624	19,868	8.1%
480000	Transportation and Warehousing	62,893	79,589	16,696	26.5%
510000	Information	27,082	28,772	1,690	6.2%
520000	Finance and Insurance	68,155	73,211	5,056	7.4%
530000	Real Estate and Rental and				
	Leasing	29,296	34,237	4,941	16.9%
540000	Professional, Scientific, and				
	Technical Services	93,458	105,874	12,416	13.3%
550000	Management of Companies and				
	Enterprises	17,893	20,503	2,610	14.6%
560000	Administrative and Support and				
	Waste Management	158,037	187,212	29,175	18.5%
610000	Educational Services	168,072	183,258	15,186	9.0%
620000	Health Care and Social Assistance	243,973	295,962	51,989	21.3%
710000	Arts, Entertainment, and				
	Recreation	29,373	32,273	2,900	9.9%
720000	Accommodation and Food				
	Services	217,852	263,148	45,296	20.8%
810000	Other Services	98,596	103,611	5,015	5.1%
900000	Government	154,731	158,331	3,600	2.3%

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

CURRENT AND FUTURE EMPLOYMENT BY OCCUPATION

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

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

FIGURE 11: S.C. OCCUPATIONAL EMPLOYMENT AND WAGES, 2018

Occupational		Total	Hourly Mean	Hourly Median
Code	Occupational Title	Employment	Wage	Wage
00-0000	All Occupations	2,062,280	\$20.78	\$16.23
11-0000	Management Occupations	89,190	\$49.57	\$42.97
	Business and Financial Operations			
13-0000	Occupations	75,560	\$31.07	\$28.23
15-0000	Computer and Mathematical Occupations	39,740	\$35.59	\$33.48
17-0000	Architecture and Engineering Occupations	40,400	\$38.44	\$36.43
19-0000	Life, Physical, and Social Science Occupations	9,350	\$31.45	\$28.38
21-0000	Community and Social Service Occupations	25,090	\$20.75	\$18.64
23-0000	Legal Occupations	13,800	\$35.13	\$26.55

Occupational		Total	Hourly Mean	Hourly Median
Code	Occupational Title	Employment	Wage	Wage
25-0000	Education, Training, and Library Occupations	114,270	\$23.10	\$21.97
	Arts, Design, Entertainment, Sports, and			
27-0000	Media Occupations	18,760	\$23.34	\$18.49
	Healthcare Practitioners and Technical			
29-0000	Occupations	125,690	\$35.12	\$28.19
31-0000	Healthcare Support Occupations	54,750	\$13.98	\$12.60
33-0000	Protective Service Occupations	47,820	\$18.59	\$17.25
	Food Preparation and Serving-Related			
35-0000	Occupations	209,530	\$10.53	\$9.29
	Building and Grounds Cleaning and			
37-0000	Maintenance Occupations	70,960	\$12.10	\$10.98
39-0000	Personal Care and Service Occupations	59,510	\$11.64	\$9.99
41-0000	Sales and Related Occupations	227,570	\$16.63	\$11.84
	Office and Administrative Support			
43-0000	Occupations	304,960	\$16.81	\$15.48
45-0000	Farming, Fishing, and Forestry Occupations	4,060	\$17.45	\$15.40
47-0000	Construction and Extraction Occupations	83,040	\$19.82	\$17.99
	Installation, Maintenance, and Repair			
49-0000	Occupations	95,050	\$21.50	\$20.13
51-0000	Production Occupations	199,480	\$18.75	\$17.20
	Transportation and Material Moving			
53-0000	Occupations	153,680	\$16.29	\$14.34

Source: Occupational Employment Statistics Program, 2018

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

FIGURE 12: S.C. TOP 25 IN-DEMAND OCCUPATIONS OVER A 12-MONTH PERIOD MAY 2018 - APRIL 2019

Occupation Code	Occupation Title	S.C. 2018 Average
		Hourly Wage
29-1141	Registered Nurses	\$31.22
41-1011	First-Line Supervisors of Retail Sales Workers	\$19.61
41-2031	Retail Salespersons	\$12.70
53-3032	Heavy and Tractor-Trailer Truck Drivers	\$21.28
43-4051	Customer Service Representatives	\$15.54
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	\$15.65
43-5081	Stock Clerks and Order Fillers	\$12.75
49-9071	Maintenance and Repair Workers, General	\$17.72
41-2011	Cashiers	\$9.69
43-1011	First-Line Supervisors of Office and Administrative Workers	\$25.33
31-1014	Nursing Assistants	\$12.21
53-3033	Light Truck or Delivery Services Drivers	\$15.58
21-1093	Social and Human Service Assistants	\$15.22
35-3021	Combined Food Preparation and Serving Workers	\$9.09

Occupation	Occupation Title	S.C. 2018
Code		Average
		Hourly Wage
29-1069	Physicians and Surgeons, All Other	\$89.04
33-9032	Security Guards	\$15.86
15-1142	Network and Computer Systems Administrators	\$36.36
17-2112	Industrial Engineers	\$41.86
11-1021	General and Operations Managers	\$48.75
51-1011	First-Line Supervisors of Production and Operating Workers	\$32.15
11-9111	Medical and Health Services Managers	\$47.49
41-3099	Sales Representatives, Services, All Other	\$23.88
37-2012	Maids and Housekeeping Cleaners	\$9.87
29-1123	Physical Therapists	\$41.08
35-2014	Cooks, Restaurant	\$11.38

Source: Job Postings: The Conference Board, Health Wanted Online® Data Series; Wages: U.S. Bureau of Labor Statistics

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

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

FIGURE 13: S.C. OCCUPATIONAL EMPLOYMENT PROJECTIONS, 2016-2026

Occupational		Estimated 2016	Projected 2026	Numeric	Percent	Annual Total
Code	Occupational Title	Employment	Employment	Change	Change	Openings
00-0000	All Occupations	2,205,704	2,462,025	256,321	11.6%	284,336
11-0000	Management Occupations	127,849	137,823	9,974	7.8%	11,214
13-0000	Business and Financial Operations Occupations	86,283	98,373	12,090	14.0%	9,370
	Computer and Mathematical	·	·	,	·	•
15-0000	Occupations Architecture and Engineering	39,597	45,397	5,800	14.6%	3,350
17-0000	Architecture and Engineering Occupations	39,528	45,055	5,527	14.0%	3,539
19-0000	Life, Physical, and Social Science Occupations	10,547	11,445	898	8.5%	1,061
21-0000	Community and Social Service Occupations	29,911	33,785	3,874	13.0%	3,719
23-0000	Legal Occupations	15,401	17,126	1,725	11.2%	1,224
25-0000	Education, Training, and Library Occupations	114,248	126,874	12,626	11.1%	11,265
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	25,317	27,205	1,888	7.5%	2,736
29-0000	Healthcare Practitioners and Technical Occupations	124,135	145,742	21,607	17.4%	9,233

Occupational		Estimated 2016	Projected 2026	Numeric	Percent	Annual Total
Code	Occupational Title	Employment	Employment	Change	Change	Openings
31-0000	Healthcare Support Occupations	57,480	71,496	14,016	24.4%	8,548
33-0000	Protective Service Occupations	50,390	53,792	3,402	6.8%	5,424
	Food Preparation and Serving-					
35-0000	Related Occupations	199,899	240,664	40,765	20.4%	40,748
	Building and Grounds Cleaning					
37-0000	and Maintenance Occupations	89,163	103,163	14,000	15.7%	13,349
	Personal Care and Service					
39-0000	Occupations	76,554	89,122	12,568	16.4%	13,736
41-0000	Sales and Related Occupations	242,602	266,021	23,419	9.7%	37,196
	Office and Administrative					
43-0000	Support Occupations	311,704	328,204	16,500	5.3%	37,442
	Farming, Fishing, and Forestry					
45-0000	Occupations	23,738	20,899	-2,839	-12.0%	2,982
	Construction and Extraction					
47-0000	Occupations	91,604	102,607	11,003	12.0%	10,943
	Installation, Maintenance, and					
49-0000	Repair Occupations	98,812	110,723	11,911	12.1%	10,989
51-0000	Production Occupations	198,592	209,334	10,742	5.4%	23,924
	Transportation and Material					
53-0000	Moving Occupations	152,350	177,175	24,825	16.3%	22,346

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

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

FIGURE 14: STATEWIDE PROJECTED FASTEST GROWING AND DECLINING OCCUPATIONS, 2016-2026

Rank	Fastest Growing	Fastest Declining
1	Home Health Aides	Respiratory Therapy Technicians
2	Physicians Assistants	Word Processors and Typists
3	Nurse Practitioners	Fallers
4	Statisticians	Computer Operators
5	Personal Care Aides	Legal Secretaries
6	Operations Research Analysts	Data Entry Keyers
7	Software Developers, Applications	Switchboard Operators, Including Answering Service
8	Physical Therapist Aides	Coin, Vending, and Amusement Machine Servicers and Repairers
9	Medical Assistants	Farmers, Ranchers, and Other Agricultural managers
10	Respiratory Therapists	Executive Secretaries and Executive Administrative Assistants
11	Combined Food Preparation and Serving Workers	Farmworkers, Farm, Ranch, and Aquacultural Animals

Rank	Fastest Growing	Fastest Declining		
12	Physical Therapist Assistants	Logging Equipment Operators		
13	Massage Therapists	Engine and Other Machine Assemblers		
14	Physical Therapists	Photographers		
15	Health Specialties Teachers, Postsecondary	Farmworkers and Laborers, Crop, Nursery, and Greenhouse		
16	Machine Feeders and Offbearers	Nuclear Power Reactor Operators		
17	Occupational Therapists	Electrical and Electronic Equipment Assemblers		
18	Health Technologists and Technicians, All Other	Agricultural Equipment Operators		
19	Security and Fire Alarm Systems Installers	Structural Metal Fabricators and Fitters		
20	Mental Health Counselors	Chemical Plant and System Operators		

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

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

EMPLOYER NEEDS

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

DEMAND FOR EDUCATION

Nationwide there is a lack of clarity on the best way to measure the demand for education. The BLS produces a listing of the typical level of education that is needed for *entry* into over 800 detailed occupations but does not necessarily advocate using those as the sole measure of educational demand. The goal of their system is to provide career advice to students as well as for individuals who are interested in switching careers. The actual distribution of educational attainment within each occupation can be significantly different that the educational requirement category listed by BLS (e.g., in 2012-2013 5.4 percent of fast food cooks held a bachelor's degree or higher).

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

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

FIGURE 15: S.C. JOBS BY EDUCATION LEVEL REQUIRED, 2018

	OES	;	Geosol		
Education	Employment	Percent	Job Postings	Percent	
Less than high school	544,350	27%	21,585	16%	
High school diploma or equivalent	853,240	42%	65,698	50%	
Some college or associate's degree	226,980	11%	12,105	9%	

	OES	5	Geosol		
Bachelor's degree or higher	423,640	21%	33,266	25%	
Total	2,048,210	100%	132,654	100%	

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

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

REQUESTED CERTIFICATIONS AND SOFT SKILLS

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

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

FIGURE 16: TOP 10 EMPLOYER-REQUESTED SOFT SKILLS AND CERTIFICATIONS IN S.C.

Soft/Hard Skills	Certification			
Oral and written communication	Driver's License			
Integrity	Commercial Driver's License			
Marketing	Certified Registered Nurse			
Team-oriented, teamwork	Basic Life Support			
Microsoft Office	HAZMAT			
Detail oriented	Certification in Cardiopulmonary Resuscitation			
Customer service oriented	Occupational Safety & Health Administration			
	Certification			
Problem solving	Continuing Education			
Organizational skills	Food safety programs			
Self-starting/Self-motivated	Licensed Practical Nurse			

Source: The Conference Board, Help Wanted Online®

MANUFACTURING WORKFORCE SURVEY AND SUPPLY GAP ANALYSIS

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

An additional analysis completed in 2017 compared regional staffing patterns, educational attainment data from postsecondary institutions, and employment projections from the Department of Employment and Workforce to determine whether there appeared to be an over or under supply of workers in five sectors

of interest for the state: Business and IT Services; Construction; Diversified Manufacturing; Healthcare; and Transportation, Logistics, and Warehousing.

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

FIGURE 17: PROJECTED WORKER SUPPLY AND DEMAND IN SELECTED OCCUPATIONS

Business and IT Services Computer and Information 11-3021 135	-
Computer and Information	-
Systems Managers)
Computer Network Support 71	
Specialists 71	
Software Developers, Systems 70	
Software	
49-9071 Maintenance and Repair (253	8)
Workers, General (233)	?)
51-2092 Team Assemblers (395	5)
53-7062 Laborers and Freight, Stock, and (602))
Material Movers, Hand	-1
Construction	
26-1198 Construction Managers 3,46	0
51-4121 Welders, Cutters, Solderers, and	1
Brazers 242	+
Heating, Air Conditioning, and	
49-9021 Refrigeration Mechanics and 177	7
Installers	
Operating Engineers and Other	
47-2073 Construction Equipment (105	5)
Operators	
47-2031 Carpenters (130))
47-2061 Construction Laborers (398	3)
Diversified Manufacturing	
51-4121 Welders, Cutters, Solderers, and	
Brazers 156	5
Multiple Machine Tool Setters,	
51-4081 Operators, and Tenders, Metal	
and Plastic 76	
Cutting, Punching, and Press	
51-4031 Machine Setters, Operators, and	
Tenders, Metal and Plastic 75	
Maintenance and Repair	
49-9071 Workers, General (401	L)
51-2092 Team Assemblers (627	7)
Laborers and Freight, Stock, and	
53-7062 Material Movers, Hand (955)	5)

SOC	Description	Projected Gap							
Healthcare									
31-9092	Medical Assistants	1,301							
29-2061	Licensed Practical and Licensed	547							
39-9021	Vocational Nurses Personal Care Aides	(472)							
31-1011	Home Health Aides	(554)							
31-1014	Nursing Assistants	(578)							
31-9092	Medical Assistants	1,301							
Tra	Transportation, Logistics, and Warehousing								
49-3011	Aircraft Mechanics and Service Technicians	29							
53-3041	Taxi Drivers and Chauffeurs	1							
49-9071	Maintenance and Repair Workers, General	(235)							
51-2092	Team Assemblers	(368)							
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	(560)							

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

A broader analysis of the supply and demand gap statewide is shown below. This analysis compares the number of student completions from public and private postsecondary institutions to projected annual job openings that require education beyond high school. The openings shows those occupations requiring more than a high school education, as defined by the U.S. Bureau of Labor Statistics. The information is also matched to one of 16 education-based career clusters.

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

FIGURE 18: SOUTH CAROLINA POSTSECONDARY COMPLETERS BY CAREER CLUSTER, 2015-2016 (LABOR SUPPLY)

Career Cluster	Less than 4 Years	Bachelor's Degree	Master's Degree	Doctoral or Professional Degree	Total
Agriculture, Food & Natural Resources	235	378	40	22	675
Architecture & Construction	974	169	57	5	1,205
Arts, Audio/Video Technology & Communications	237	2,267	148	30	2,682
Business Management & Administration	1,662	3,650	1,236	10	6,558
Education & Training	4,908	4,498	1,917	138	11,461
Finance	424	1,502	166	-	2,092
Government & Public Administration	10	872	91	8	981
Health Science	6,517	2,239	755	947	10,457
Hospitality & Tourism	431	489	26	16	962

Career Cluster	Less than 4 Years	Bachelor's Degree	Master's Degree	Doctoral or Professional Degree	Total
Human Services	2,239	2,143	686	57	5,125
Information Technology	912	743	119	17	1,791
Law, Public Safety, Corrections & Security	666	776	60	336	1,838
Manufacturing	2,214	21	-	-	2,235
Marketing	180	1,288	23	-	1,491
Science, Technology, Engineering & Mathematics	88	6,093	883	307	7,371
Transportation, Distribution & Logistic	999	16	11	-	1,026
Grand Total	22,696	27,144	6,218	1,892	57,950

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

FIGURE 19: SOUTH CAROLINA PROJECTED AVERAGE ANNUAL JOB OPENINGS REQUIRING POSTSECONDARY EDUCATION (LABOR DEMAND)

Career Cluster	Less than 4 Years	Bachelor's Degree	Master's Degree	Doctoral or Professional Degree	Total
Agriculture, Food & Natural Resources	124	274	-	-	398
Architecture & Construction	914	1,561	-	-	2,475
Arts, Audio/Video Technology & Communications	640	982	-	-	1,622
Business Management & Administration	2,850	8,624	-	-	11,474
Education & Training	2,524	6,759	1,705	1,559	12,547
Finance	12	3,710	-	-	3,722
Government & Public Administration	-	767	38	-	805
Health Science	8,080	4,112	625	1,162	13,979
Hospitality & Tourism	64	-	-	-	64
Human Services	1,584	1,447	895	124	4,050
Information Technology	985	2,178	-	-	3,163
Law, Public Safety, Corrections & Security	1,647	72	-	470	2,189
Manufacturing	1,421	289	-	-	1,710
Marketing	-	2,790	-	-	2,790
Science, Technology, Engineering & Mathematics	25	2,308	103	22	2,458
Transportation, Distribution & Logistic	5,305	384	-	-	5,689
Grand Total	26,175	36,257	3,366	3,337	69,135

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

FIGURE 20: SOUTH CAROLINA POSTSECONDARY EDUCATION GAP BY CAREER CLUSTER, 2015-2016

Career Cluster	Less than 4 Years	Bachelor's Degree	Master's Degree	Doctoral or Professional Degree	Total
Agriculture, Food & Natural Resources	111	104	40	22	277
Architecture & Construction	60	-1,392	57	5	-1,270
Arts, Audio/Video Technology & Communications	-403	1,285	148	30	1,060
Business Management & Administration	-1,188	-4,974	1,236	10	-4,916
Education & Training	2,384	-2,261	212	-1,421	-1,086
Finance	412	-2,208	166	0	-1,630
Government & Public Administration	10	105	53	8	176
Health Science	-1,563	-1,873	130	-216	-3,522
Hospitality & Tourism	367	489	26	16	898
Human Services	655	696	-209	-67	1,075
Information Technology	-73	-1,435	119	17	-1,372
Law, Public Safety, Corrections & Security	-981	704	60	-134	-351
Manufacturing	793	-268	0	0	525
Marketing	180	-1,502	23	0	-1,299
Science, Technology, Engineering & Mathematics	63	3,785	780	285	4,913
Transportation, Distribution & Logistic	-4,306	-368	11	0	-4,663
Grand Total	-3,479	-9,113	2,852	-1,445	-11,185

Source: BLS, IES, SCDEW

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

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

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

CONTINUED CHALLENGES

BARRIERS TO EMPLOYMENT

With the state unemployment rate reaching historically low levels, there are fewer and fewer individuals available to take newly created jobs or to fill positions vacated by retiring workers. This presents both a challenge and opportunity for the state. Many individuals who remain unemployed or out of the labor force may face varying challenges and barriers that may need more specific or dedicated services to meet their employment and training needs.

Juvenile Offenders

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

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

Homelessness

South Carolina's homeless population was estimated at 3,082 people in 2018, including 415 veterans, according to the U.S. Department of Housing and Urban Development. The total number of homeless increased 0.4 percent from 2017 but is down 12.1 percent compared to 2010. For 2018, eight out of every 10,000 SC residents experienced homelessness.³

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

Veterans

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

Veterans may have to overcome stereotypes employers may have such as thinking that all post-9/11 veterans have post-traumatic stress disorder (PTSD). However, veterans have a great deal to contribute to

² South Carolina Department of Juvenile Justice, 2017 Report Card, http://www.state.sc.us/djj/pdfs/2017%20Report%20Card 5.5x8.5.pdf

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

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

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

any company. Many veterans have job skills that transfer directly to the civilian world, such as integrity, attention to detail, leadership, problem solving, and a team-player mentality.

Ex-Offenders

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

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

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

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

Low-Income

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

Individuals with Disabilities

Although many innovative programs and collaborative efforts are in place in South Carolina to expand competitive, integrated employment opportunities for individuals with disabilities, data shows that a continued focus on increasing rates of employment and labor force participation is necessary.

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

⁶ South Carolina Department of Corrections, SCDC FAQs July 2019, http://www.doc.sc.gov/research/SystemOverview/SCDC_FAQs_July_2019.pdf

⁷ South Carolina Department of Corrections, Accountability Report Fiscal Year 2018, Page 9,

http://www.doc.sc.gov/research/AccountabilityReportFY2018.pdf

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

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

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

COLLEGE GRADUATE DEBT AND RETENTION

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

Major findings of that report showed:

- 64.9 percent of South Carolina college graduates from FY2009-10 were employed one-year postgraduation, and 50.0 percent were employed five years post-graduation
- Women, African-Americans, in-state students, and those pursuing less than a bachelor's degree were more likely to be found in wage records in S.C. one and five years post-graduation.
 Students majoring in Science, Technology, Engineering, or Math (STEM) fields were the least likely to be found in wages records post-graduation.
- Retention rates were higher for students that are native to South Carolina (78.6 percent) than those from out-of-state (50.2 percent).
- STEM graduates had the fastest median annual wage growth (9.6 percent) one to five years post-graduation; Trades was second (8.2 percent); and third was Business and Communication (8.1 percent).
- The college majors associated with South Carolina's Talent Pipeline Initiative¹¹ showed either above average wages (\$35,238) one-year post-graduation or higher than average wage growth (6.3 percent per year) between the first and fifth years. Many of the fields of study funded through the Workforce Innovation and Opportunity Act (WIOA) will likely have similar wage outcomes.

CONCLUSION

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

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

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

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

WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the state, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

(A) The State's Workforce Development Activities. Provide an analysis of the state's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.

The following Workforce Development, Education, and Training Activities are organized to demonstrate alignment and responsiveness to the priorities established by the WIOA State Plan Work Group and supported by the State Workforce Development Board.

K-12

CAREER AND TECHNICAL EDUCATION

Career and Technical education (CTE) programs are offered across South Carolina throughout the 79 school districts. There are 42 career and technical education centers in South Carolina of which 13 are multidistrict shared centers offering a variety of programs that correspond with SC Department of Education career clusters and provide a pathway for students to continue their education and/or transition to postsecondary employment. A list of career clusters and programs can be found on the SC Department of Education's website.

DUAL ENROLLMENT

South Carolina high school juniors and seniors have the opportunity to earn college credit toward an Associate's or Bachelor's degree while simultaneously completing their high school graduation requirements. College courses are provided by an accredited institution of higher education either at the high school or on the college/university campus. The courses offered through dual enrollment vary by institution, but often include general education and career and technology courses. Dual enrollment helps put students on a college and/or career track before graduating from high school and, as a result, helps build the talent pipeline South Carolina needs to support new and expanding businesses.

CAREER READINESS ASSESSMENT

South Carolina passed legislation in 2014 requiring all 11th grade students to take a Career Ready assessment. In compliance with the legislation, Ready to Work® tests, developed by the Worldwide Interactive Network, Inc. (WIN Learning), are administered in Applied Mathematics, Locating Information, Reading for Information and Essential Soft Skills. Ready to Work® was administered for the first time in spring 2018. Prior to Ready Work®, the ACT WorkKeys® assessment was used.

ADULT EDUCATION

ADULT EDUCATION YOUNG ADULT POPULATION PILOT

More than 10,000 students who are 17 to 21 years of age enroll into adult education classes across the state each school year. To increase adult education provider success with this age group, the Office of Adult Education developed a pilot process in 2017. The pilot process expanded in 2018 and increased to include eight adult education providers located in Colleton, Dorchester, Darlington, Horry, Lexington, Pickens, and Richland Counties (representing both Richland One and Richland Two School Districts). The purpose of this pilot is to help students in this age range see the "light at the end of the tunnel" sooner. Each program has

assigned a dedicated teacher to work with this age group only. A career navigator or career counselor monitors student interest and gathers college and employment information to share with students so that they are aware of all opportunities that are in their communities. Job shadowing and college tours are also made available for interested students.

Outcome information covers the timeframe from July 1, 2018 to June 30, 2019. There were 1,437 students enrolled in the eight Pilot Programs. Eighty-one percent of students enrolled entered the eight programs at the Adult Basic Education Level 4 or below. Eighty-four of the enrolled students were English as a second language (ESL) students. Seven hundred and twenty students were post-tested, and 518 achieved one or more educational functioning level gains. Although 81 percent of the students entered the Pilot Programs at Level 4 or below, 58 percent of these students graduated within the program year. A total of 393 students earned a high school diploma or high school equivalency diploma.

INTEGRATED ENGLISH AND LITERACY

The Integrated English Literacy/Civics Education (IEL/CE) program is authorized by Title II of the Workforce Innovation and Opportunity Act of 2014 (WIOA). The purpose of the IEL/CE program is to assist immigrants and other individuals who are English language learners to improve their reading, writing, and comprehension skills in English and mathematics, as well as understanding the American system of government, individual freedom, and the responsibilities of citizenship. In addition to requiring that the program of instruction be designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language, it also requires that the program of instruction must lead to attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education and training or employment. Twelve Adult Education programs, representing one from each Workforce Area, received funding to provide these services.

INTEGRATED EDUCATION AND TRAINING

The SC Department of Education (SCDE) Office of Adult Education (OAE) has worked with local adult education providers across the state to develop Integrated Education and Training (IET) programs. IET is a process that, concurrently and contextually, combines student academic preparation, workforce preparation, and occupational training. The OAE currently has approved IET programs in eighteen counties in SC; these IET programs cover seven of the twelve Local Workforce Areas. All approved IET programs are in alignment with the five high growth sectors as identified by the State Leadership team and are directly linked to local employment needs. The OAE plans to work with the Adult Education programs in the remaining five Workforce Areas to develop IET processes during the 2019-20 school year, with the goal of having one or more approved IET programs in all twelve Workforce Areas by July 2020.

TWO- AND FOUR-YEAR EDUCATIONAL OPPORTUNITIES

TECHNICAL COLLEGE SYSTEM

The SC Technical College System consists of 16 colleges that offer credit and non-credit certificates, diplomas and degree programs, and short-term and continuing education training. The System also includes readySC, Apprenticeship Carolina, and E-Zone.

readvSC™

readySC™ is a division of the SC Technical College system and is a key contributor to the state's economic development efforts. Recognized nationally as a premier program of its kind, readySC™ provides recruiting and initial training for new and expanding businesses. readySC™ continues to be a top incentive for our state with more than 85 percent of relocating companies ranking readySC™'s services as playing a significant role in their ultimate decision to move to South Carolina.

E-Zone

The E-Zone program incentivizes education and training by allowing South Carolina manufacturing companies to utilize the Job Retraining Tax Credit (E-Zone) program, which reimburses training and education related expenses. Subsequent to approval by the State Board for Technical and Comprehensive Education, companies may claim a credit of \$1,000 per employee against withholding taxes.

Apprenticeship Carolina™

Apprenticeship Carolina™ works to ensure that all employers have access to information and technical assistance to create demand-driven apprenticeship programs. At no cost to the employer, apprenticeship consultants are available to guide companies through the registered apprenticeship development process from initial information to full recognition in the national Registered Apprenticeship System. South Carolina has 33,695 registered apprentices and 1,048 registered programs. Apprenticeship Carolina™ is recognized by the US Department of Labor as a national model for apprenticeship expansion.

South Carolina's high school students have the opportunity to participate in a Youth Apprenticeship program, which combines high school curriculum and career and technology training with critical on-the-job training performed at a local business. There are over 200 Youth Apprenticeship Programs in the state.

COLLEGES, UNIVERSITIES AND PROFESSIONAL SCHOOLS

South Carolina has three research institutions, 10 comprehensive four-year colleges/universities, and four two-year regional University of South Carolina campuses. There are also 23 private senior and two-year institutions, and two professional schools.¹² There are a growing number of transfer and articulation agreements between the SC Technical College System and South Carolina's four-year senior institutions, allowing students to continue their education and ultimately earn a baccalaureate degree.

WORK-BASED LEARNING AND TRAINING PROGRAMS

Work-based learning and training models are widely used across programs as an effective vehicle for training new workers as well as upskilling existing workers. The following types of work-based learning are most prevalent in South Carolina:

ON THE JOB TRAINING (OJT)

OJT is primarily used to help individuals secure employment and obtain the specific skills and competencies needed for full performance of the job. Each program has specific OJT requirements but generally speaking a program participant is matched with an employer to fill an open position. The employer trains the new employee on-the-job and is reimbursed a percentage of the employee's wages during the period of training.

JOB TRY OUTS

Job try-outs are a stipend-funded training service coordinated between SCVRD, the client, and a business partner. During a job try-out, a career ready client learns specific, basic skills for a job at a company's worksite(s). While similar to OJT, clients are not employed at the time of training.

JOB READINESS TRAINING CENTERS

Local SCVRD job readiness training centers are working within their communities to identify demand-driven training opportunities and needs. The SCVRD training centers utilize customized job readiness training contracts to build foundational skills and refer qualified clients to business partners for employment opportunities. SCVRD is developing demand-driven and customized trainings for identified industries and

¹² SC Commission on Higher Education, About CHE and SC Higher Education Quick Facts, 2016.

employers throughout the state. There are currently 30 demand-driven training programs available across the state, with fifteen additional trainings planned for the future. There are currently two customized training initiatives and three planned for the future.

INCUMBENT WORKER TRAINING (IWT)

IWT is designed to ensure that current employees are able to gain the skills necessary to retain employment and advance within the company. Ideally, IWT will result in industry recognized credentials, as well as pay increases and/or promotion opportunities. The Title I Adult program routinely uses IWT to engage businesses and provide funding to upskill existing employees. Local Workforce Development Areas can use up to 20% of their combined Adult and Dislocated Worker funding to provide IWT. SC also uses Governor's Reserve Funding to provide additional IWT funding to LWDAs.

APPRENTICESHIP

Apprenticeship programs offer a unique opportunity for individuals to earn while learning the technical skills needed to perform a specific job function. South Carolina has more than 1,000 apprenticeship programs that are registered with the US Department of Labor. Non-registered apprenticeship programs also exist. Each program looks for opportunities to connect clients and participants to employers through apprenticeship programs. For example, Registered Apprenticeship programs are included in the Eligible Training Provider List used by the Title I Adult program.

SOFT SKILLS TRAINING OPPORTUNITIES

SC JOBREADYU SOFT SKILLS TRAINING CURRICULUM (SCJRU)

SCJRU is a web-based soft skills program available at no cost to organizations and businesses that do not have access to other soft skills instruction. The curriculum covers communication, time management, and problem-solving skills, as well as core academic skills.

WIN LEARNING ESSENTIAL SOFT SKILLS CREDENTIAL

WIN Learning's Career Readiness Courseware includes the Essential Soft Skills Credential. The credential is a proctored assessment composed of questions measuring entry-level work tasks and behaviors, such as cooperate with others, resolve conflict and negotiate, solve problems and make decisions, observe critically, and take responsibility for learning. High school juniors are required to take the soft skills assessment; the WIN Courseware and related assessments are available to individuals participating in the programs included in this plan.

PROGRAMS AND ACTIVITIES THAT ENHANCE SERVICES TO PRIORITY POPULATIONS

OUT OF SCHOOL YOUTH

Jobs for America's Graduates-SC

Jobs for America's Graduates-SC (JAG-SC) is a dropout prevention program dedicated to high school and postsecondary academic success. Coupled with the development of career readiness skills in young people, JAG-SC strives to aid youth in securing quality jobs and pursuing a career. JAG-SC serves an in-school, atrisk youth population of approximately 1,000 participants per year, while concurrently providing follow-up counseling and placement services to the previous year's seniors in 19 high schools across the state.

A committed Career Specialist in each affiliated school functions as a teacher, coach, counselor, and advocate for students with documented barriers to success. Over the course of their enrollment, students master 81 competencies identified by business as essential to successful employment, while developing skills in the areas of academics, career development, leadership, civic-mindedness, social awareness, and

community service. This is accomplished through competency instruction and the hands-on involvement of school and community partners.

Since its inception in 2005, JAG-SC has served over 11,000 youth, with an average of 7 barriers to success, in 13 school districts across the state, launching 3,076 seniors on a path to productive citizenry. The program has consistently maintained an average 96.6 percent graduation rate and a return to school rate greater than 97 percent since 2006. For nine consecutive years, the program has been awarded the National JAG "5-of-5" Award for exceeding all five of the national standards for graduation rate, school placement rates, total positive outcomes rates, job placement rates, and full-time jobs rates.

Given the success of the Multi-Year JAG Model in South Carolina, the State Workforce Development Board set aside \$400,000 to pilot the JAG Out-of-School Model. The Model targets youth, ages 16-24, who are no longer enrolled in a secondary school through drop-out recovery activities. Through the Out-of-School Model, participants complete the requirements for a high school diploma or GED certificate while attaining JAG's basic employability skills and participating in work-based learning experiences. Additionally, the program emphasizes the importance of community service and professionalism through the use of a participant-lead association that focuses on refining personal and leadership skills.

SCVRD was awarded one of the JAG Out-of-School grants. As of October 2019, the pilot program had achieved an 87% graduation rate compared to the goal of 50%. There have been 24 positive outcomes, 47% of participants are employed and 56% are either employed, in the military, or enrolled in postsecondary education or training or a combination of education and work.

Job Corps

The Bamberg Job Corps Center is federally funded by the US Department of Labor (USDOL) and has been in operation since 1979. It is a residential training center for youth, providing a variety of workforce development and educational activities, including: GED preparation and testing, academic coursework and support, career readiness training and assessment, and job placement services, among other activities.

The Bamberg Job Corps Center has a number of partnerships with local WIOA programs, adult education providers, technical colleges, and SCVRD. Participants are referred to Job Corps through these partnerships.

National Guard Youth Challenge (SCNGYC)

The SCNGYC is a two-phase program consisting of a two- week residential phase that allows cadets a short opportunity to adjust to the rigors and discipline of the program, followed by a 20-week program where cadets receive military-based training, engage in supervised work experience and complete eight core program components. These include: academic excellence, health and hygiene, job skills, leadership/followership, life-coping skills, physical fitness, responsible citizenship and service to community. Cadets are also matched with a mentor who will provide one-on-one support to graduates during the 12-week post-residential phase.

JUVENILE AND ADULT OFFENDERS

Birchwood School District

Birchwood School is located at DJJ's Broad River Road Complex (BRRC) in Columbia, South Carolina. Birchwood is a comprehensive school providing education for male and female students in grades 6 through 12. Birchwood offers Career and Technical Education (CTE) completer programs and core academic courses. Birchwood students may also complete dual credit courses and earn college credits by attending courses virtually or in-person with an instructor. College credits may be earned through articulation agreements with Allen University and the SC Technical College System. In addition to academic subjects such as English (ELA), math, science, and social studies, Birchwood School offers CTE Completer programs

in the following areas: carpentry, ceramics, culinary arts, digital desktop publishing, entrepreneurship, integrated business applications, matting & framing, music technology, personal finance, and welding. Work related transitional courses, such as woodworking and upholstery, are also available to BRRC youth. In preparing high school graduates for life beyond DJJ, students can earn industry certifications in areas such as, ServSafe (Food Handlers and Manager), OSHA 10, NCCER, and Forklift Operator. A SC Vocational Rehabilitation Department (SCVRD) counselor is housed at BRRC daily to assist eligible students with school-to-work transition and the full range of SCVRD services, including connecting students with local SCVRD staff in their home community as they approach release.

Career Readiness Center (CRC)

In October of 2013, DJJ opened its innovative Job Readiness Training Center (JRTC) in Columbia, South Carolina, later renamed the Career Readiness Center (CRC). Developed in collaboration with community partners, the CRC provides life and job skills classes to DJJ youth on probation, parole, or in committed status ranging primarily from ages 14 to 19, and other youth as part of the agency's prevention and intervention efforts. This facility is equipped with video conferencing and projection capabilities and, while centrally located on BRRC in Columbia, the CRC is accessible to remote sites across the state in county offices and wilderness programs. Instruction is provided by DJJ staff as well as community partners from different disciplines. The class sessions are taught in complete one-to-two-hour blocks, with certificates provided to participants upon completion. During FY 14-15, the CRC expanded its mission to include a job development component. Four regional job developers or career development facilitators are now working across the state to connect DJJ involved youth with employment, vocational training, and postsecondary education. SCVRD has partnered with SCDJJ to provide direct vocational rehabilitation services to our main secure facility and residential placement facility in the Columbia area.

Youth Empowerment Sites (YES) Program for At-Risk Youth

DJJ's YES program is an employability training program designed for at-risk youth ages 16-19. The program provides job skills training, career exposure, and community internship/work experience for participants at sixteen (16) sites across the state. The sixteen (16) sites are aligned with the 16 judicial circuits to provide statewide coverage. Each site is designed to serve 60 students per year through the paid internship experience. The students will receive 70 hours of paid internship (state minimum wage) with local businesses and potential employers. The YES program provides opportunities to over 960 youth annually.

Youthful Offender Parole and Reentry Services (YOPRS)

The SC Department of Corrections (SCDC) Division of YOPRS provides both institutional and community-based services for male and female offenders sentenced under the Youthful Offender Act (YOA). Eligible individuals must be between 17 and 25 years of age at the time of conviction and have no previous YOA convictions. The mission of this division is to reduce the recidivism of youthful offenders by utilizing evidence-based principles and practices that teach accountability, promote public safety, and enhance skill development with a focus on employability.

While incarcerated, SCDC's institutional staff provides youthful offenders with job and career development. Upon reentry into the community, the officers guide the offenders in locating resources within the community that can assist with employment and other reentry needs. Additionally, SCDC's intensive supervision officers provide parole supervision while assisting these young adults with seeking and maintaining employment.

Self-Paced In-Classroom Education Program (SPICE)

The SPICE program is a voluntary inmate education and employment initiative that provides meaningful educational opportunities, such as vocational skills training, career readiness training, life skills training, and spiritual awareness. This initiative is a faith—based community partnership between SCDC, SC Department

of Probation, Parole and Pardon Services (SCDPPPS), SCVRD, and the SC Technical College System. The SPICE program consists of two components: an institutional component and a community-based supervision component.

The Institutional Component is operated by SCDC at designated facilities throughout the state where inmates participate in a SPICE program curriculum consisting of educational, spiritual, social/life skills, vocational, health education, and wellness training.

SCDPPPS operates the community-based supervision component during which individuals on probation participate in vocational skills training or HSED preparation, attend spiritual events (e.g. Church), and are assigned community/church sponsors and mentors to assist in their transition. Offenders who choose not to participate in spiritual events may opt to participate in approved public works programs or community events with assistance from their sponsor or mentor.

Upon completion of the vocational/educational training element, SCDPPPS agents coordinate with community sponsors and mentors and other service agencies to facilitate offender employment.

Manning and Camille Graham One-Stops

DEW and SCDC are partnering to help offenders find jobs through a work ready initiative that launched in November 2014. With onsite support from SC Works at the Manning Correctional Institution, this partnership allows inmates to participate in a series of workshops that develop key employable skills. After completing the required workshops and intensive services, job-ready participants are referred to a recruiter or career development specialist for additional training and services. DEW also assists in getting each inmate that successfully completes the program bonded through the Federal Bonding Program. DEW also assists employers through the process of utilizing the Work Opportunity Tax Credit (WOTC) which can reduce an employer's federal tax liability up to \$2,400 for each qualifying ex-offender hired.

The success of the Manning program led DEW and SCDC to expand the program into Camille Griffin Graham Correctional Institution, an all-female facility, in the summer of 2017.

Bounce Back

Bounce Back is a multi-disciplinary program designed to help address many of the challenges faced by individuals with a criminal background. The program is designed to help prepare those with criminal backgrounds to enter or re-enter the workforce. Two of the greatest challenges facing individuals with a criminal background are finding and maintaining employment. The program brings together community partners for a common purpose and goal. Coordinated and offered by the SC Vocational Rehabilitation Department, the program invites agencies and service providers to share information that will help participants learn greater skills for a life without crime. The day-long program introduces participants to many of the resources available in their community.

VR offices design and offer a program they feel best addresses the needs of their clients with a criminal background. Common topics that all offices address included working with the client's Probation Counselor, gaining insight into remaining in compliance with SCDPPPS, as well as how to apply for a pardon and the expungement process. Additional topics included:

- The Value of Work
- Attitude for Success
- Finding Employment and Maintaining Employment
- Services found at the Library
- Quick Jobs (Technical Colleges)
- Alcohol & Drug Treatment and Awareness

- Client Success Story
- Addressing Transportation Challenges
- Employer Presentation (What they look for in an employee)
- Goal Setting
- Social Media: The Good and the Bad
- Time Management

The following partners have participated in the Bounce Back program: SC Department of Probation, Parole and Pardon, Technical Colleges, SC Department of Motor Vehicles, County Libraries, SC Works, the State Solicitors Office, SC Legal Services, Austin Wilkes Society, Goodwill Services and local nonprofits who provide resources.

VETERANS AND ELIGIBLE SPOUSES

Veterans Programs and Services

SC Works representatives are available in centers throughout the state to help veterans transition into the workforce. Local Veterans' Employment Representatives (LVER) staff conduct employer outreach and job development in the local community to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups. Disabled Veteran Outreach Program (DVOP) Specialists are trained to provide intensive case management services to veterans and eligible spouses with Significant Barriers to Employment (SBE), as well as age priority veterans ages 18 to 24, Vietnam-era veterans, and eligible transitioning service members, spouses, and family caregivers. Case management services include individual career coaching, job referral, resume preparation assistance, career fairs and job search workshops, jobs training programs, and referrals to supporting or training services.

SCVRD has an ongoing partnership with SCDEW's LVERs and DVOPs to coordinate outreach efforts with federal contractors. Federal contractors are required to establish an annual hiring benchmark for protected veterans and individuals with disabilities, or adopt the national benchmark provided by the Office of Federal Contract Compliance Programs (OFCCP). Through this informal partnership, SCVRD and SCDEW LVERs and DVOPs identify work ready individuals and coordinate employment opportunities with federal contractors.

INDIVIDUALS WITH DISABILITIES

Strategic Partnerships

SC Disability Employment Coalition

The SC Disability Employment Coalition is a statewide systems improvement effort that comprises a broad stakeholder group working to improve employment recruitment, retention, and advancement for South Carolinians with disabilities. Primary activities of the coalition include raising awareness among South Carolina's businesses regarding hiring people with disabilities, supporting systems to ensure employment is the preferred service option and outcome for people with disabilities, disseminating information relating to employing people with disabilities, and collecting quantitative and qualitative data about the experiences of employers and employees with disabilities, among other activities. Partners include ABLE SC, AccessAbility, Walton Options for Independent Living, SC Vocational Rehabilitation Department, SC Commission for the Blind, SC Department of Disabilities and Special Needs, SC Department of Education, SC Department of Employment and Workforce, SC Department of Health and Human Services, Protection and Advocacy for Individuals with Disabilities, Inc., SC Developmental Disabilities Council, Family Connection of SC, University of South Carolina Center for Disability Resources, and SC Department of Mental Health.

In 2016, a consortium of partners working through the SC Disability Employment Coalition received a Partnership in Employment Systems Change grant known as the SC Employment First Initiative. The purpose of the grant is to increase competitive integrated employment outcomes for young adults with intellectual and developmental disabilities. The initiative had three broad goals: 1.) Equip high school students and recent graduated with intellectual and development disabilities with the skills, awareness, and confidence needed to enter competitive employment. 2.) Unify and empower South Carolina education professionals, employment service providers, families, and the community at large towards support of Employment First principles. 3.) Develop and expand supports for South Carolina-based employers who hire persons with disabilities in competitive, community-based positions. A major focus of the SC Employment First Initiative is to implement policy that competitive and integrated employment shall be considered the first option for any individual with disabilities applying for or receiving services from the state or any of its political subdivisions.

Employment First legislation was introduced during the previous legislative session which resulted in establishment of a study committee. A full report from the committee was issued in May of 2019 demonstrating both the need for and the positive impact of employing individuals with disabilities in South Carolina. The Employment First Initiative Act H.4768 was introduced to the House on January 12, 2020 and is currently in committee. If passed, the act would establish a commission that would recommend strategies to help state agencies, local government, and the private sector adopt a multifaceted approach to support individuals with disabilities obtaining employment. Consisting of 17 appointed members, the South Carolina Employment First Oversight Commission would also track state agencies' progress toward implementing aspects of the bill. The findings would be issued in an annual report to the governor and members of the South Carolina General Assembly.

Transition Alliance of South Carolina (TASC)

The Transition Alliance of South Carolina is a broad systems improvement and technical assistance resource for professionals working with students with disabilities. Their primary outcome is to empower students to transition into community-based employment. Local transition programs choose to enhance their curriculum through a variety of evidence-based transition practices, including student-led IEP meetings, goal setting and attainment, socializing in the workplace, job accommodations, and other activities meant to empower students with disabilities to control their career strategy. TASC consists of a state-level interagency steering committee that supports local interagency transition teams across the state.

Centers for Independent Living

CILs are designed and operated within a local community by individuals with disabilities and provide an array of independent living services, such as one-on-one and group training on topics such as employment soft skills, transportation utilization, accommodation requests, and transition from high school to post-secondary life. CILs have been strong resources to SC Works Centers, such as providing disability sensitivity awareness training, assessing centers for accessibility, and serving on local boards. South Carolina has three CILs: Able SC, Walton Options for Independent Living, and AccessAbility.

Work Incentives Planning and Assistance (WIPA)

Walton Options for Independent Living and Able SC are WIPA providers that empower SSI and SSDI beneficiaries with disabilities to make informed decisions regarding their career strategies and transitioning to self-sufficiency. Community Work Incentives Coordinators provide in-depth counseling about benefits and the effect of work on those benefits; conduct outreach efforts to beneficiaries of SSI and SSDI (and their families) who are potentially eligible to participate in federal or state work incentives program; and work in cooperation with federal, state, and private agencies and nonprofit organizations that serve social security beneficiaries with disabilities.

Ticket to Work

Ticket to Work is a voluntary program for people receiving disability benefits from Social Security and whose primary goal is to find good careers and have a better self-supporting future. Consumers may receive employment services through an employment network provider, including career counseling, socialization to the workplace, and job support advice, among others. Able SC is approved by the U.S. Social Security Administration (SSA) to serve ticket beneficiaries as an Employment Network (EN) under SSA's Ticket to Work program

Pre-Employment Transition Services for Students with Disabilities

Based on FY 2017 school district report card data, the statewide total for high school students with Individualized Education Plans (IEP) has reached 27,306 (SC Dept. of Education). Comparatively, in FY 2019 SCVRD opened 1,994 new cases for students referred through the school system, which represents 14 percent of the agency's total new referrals. 10,560 students received at least one Pre-ETS service during the year, almost doubling the number of students receiving Pre-ETS the preceding year. Although SCVRD has made significant inroads in transition services in recent years by ramping up partnerships in schools and dedicating more staffing to school-to-work transition, to meet the new WIOA requirements and the need indicated by the total number of students receiving Individuals with Disabilities Education Act (IDEA) services, multiple new partnerships were established for delivery of Pre-ETS across the state. Of the consumers that SCVRD is currently serving, 29% are students (age 13-21 and enrolled in education) and 47% are youth (age 14-24).

The SCCB provides Pre-employment Transition Services to students with disabilities who are eligible or potentially eligible for SCCB's Vocational Rehabilitation program. SCCB employs 3 Transition Counselors who travel statewide in order to coordinate Pre-employment Transition Services in conjunction with local school districts and the SC School for the Deaf and Blind. In addition, SCCB has contractual partnerships with SCVRD, Able SC, NFB Successful Transitions, and Walton Options to provide work-place readiness, work-based learning experiences, counseling on post-secondary opportunities, and instruction in self-advocacy. SCCB Transition Counselors provide job exploration counseling in addition to the other 4 required Pre-Employment Transition Services. SCCB has worked to insure that these services are available in all areas in SC including rural areas and works with our partners to assist with transportation to enhance service delivery to this population.

Career Boost

Career BOOST (Building Occupational Options for Students in Transition) is a contractual partnership between the SCCB, South Carolina's Independent Living Centers, the National Federation of the Blind of South Carolina, and public schools. Under this contract, eligible and potentially eligible students with disabilities receive classroom instruction in Self-Advocacy Skills, Work Readiness (Soft) Skills and Counseling on Opportunities for Post-Secondary Enrollment.. Career BOOST also funds college and university campus tours that include meetings with academic advisors, disability resource centers, student housing, and financial aid officials. The purpose of Career BOOST is to provide these "Pre-Employment Transition Services" to give middle and high school aged students with disabilities career exploration and preparation experiences before exiting the public school system.

Student Internship Program (JSIP)

The SCCB provides eligible high school students with an opportunity to gain valuable work experience during a summer internship with business partners throughout the state. Participants receive a stipend upon successful completion of the program. This program is also available to college students.

Summer Teen Program

Summer Teens is an eight (8) week summer residential program located at the Ellen Beach Mack Rehabilitation Center in Columbia. Summer Teens includes work readiness skills training, soft skills training, self-advocacy skills training, and work-based learning experiences. Summer Teens 2017 included a Science, Technology, Engineering, and Math Career Exploration Week where scientists from NASA, San Jose State University, the Space Telescope Institute, and the International Astronomical Union used 3-D printer technology to help blind students explore STEM careers using tactile three-dimensional models.

Project SEARCH

Project SEARCH is an international program first developed in 1996 at the Cincinnati Children's Hospital. South Carolina currently has fourteen Project SEARCH locations.

Project SEARCH is a unique, business-led transition program designed to provide education and job training to young adults with intellectual and developmental disabilities. Students participate in the program for a full school year. They receive classroom instruction, including training in employability and independent living skills, and master core job skills through three 9- to 10-week internship rotations.

Upon successful completion of the program, students are employed in nontraditional, complex and rewarding jobs in the host-company and community. Along with job skills, the Project SEARCH program gives students self-confidence, opportunities, and hope for a thriving future.

Job Driven Vocational Training Programs

SCVRD continues to develop job driven skills training based on specific business needs in local communities. Skills training is delivered through the department's local area offices in partnership with community entities including technical colleges to grow skilled talent pools from which local business partners can recruit and hire. Used in conjunction with other statewide workforce development efforts, this individualized training assists individuals with disabilities to access training that is customized to meet their needs and the needs of businesses. This initiative is coordinated through SCVRD's Business Services Team, whose members also collaborate at the local and regional level on interagency business services teams including all WIOA core partners.

An example of this customized training approach is the partnership with Bosch. What began as a small recycling program has turned into a customized training initiative that provides VR consumers with excellent career opportunities and Bosch with a talent pipeline. In 1997 VR began recycling used oxygen sensors for the Bosch plant in Anderson. Now, VR's Anderson Training Center has an entire room dedicated to training consumers for employment at Bosch. In addition to recycling, consumers assemble oxygen sensors from start to finish. These sensors are a critical component of car engines and are sold across the nation. As Bosch discovered the capabilities of VR consumers, the partnership has grown.

VR is in the process of establishing skills training for Certified Production Technician and Certified Logistics Technician credentials.

Aging Workers and Workers that Acquire Disabilities

Identifying and meeting the needs of older workers to support their continued participation in employment is essential to meeting the need for talent and experience in the workforce. As an example, SCVRD provides Job Retention Services (JRS) for individuals who are currently employed but may face the jeopardy of losing their employment due to a variety of factors. Through evaluation of their strengths and abilities, identification of supports, and the use of rehabilitation technology, older workers can often maintain employment or retrain in a new role before losing their jobs.

As highlighted in the 34th Institute on Rehabilitation Issues titled "The Aging Workforce," services and interventions must be adapted to meet the diverse needs of mature workers. This includes, but is not limited to, timely provision of supports, identification of training needs and process/procedure barriers, and planning for effective strategies to enhance outcomes and work options later in life. ¹³

HOMELESS POPULATION

Back to Work Program

The Back to Work Program was launched by DEW in partnership with Transitions, a local homeless shelter in Columbia, South Carolina in 2015. Because of the success of the program, in 2017 the Back to Work program was expanded to include Serenity Place in Greenville that works with individuals in addition recovery. Year after year the program has expanded to all 12 regions with partner organizations such as shelters, addiction treatment centers, community organizations, and state agencies.

The Back to Work program was created to help these individuals through a comprehensive approach to learn the skills necessary to gain self-sufficiency and soft skills. A partner agency works with individuals to develop life skills and address challenges such as housing, addiction or medical needs while DEW staff conducts an intensive employment boot camp, which creates the opportunity for long-term success.

Participants are trained in areas such as soft skills, diversity in the workplace, conflict in the workplace, resume writing, financial management, interviewing skills and dress for success. The culmination of the Back to Work program is a hiring event exclusively for participants and a graduation ceremony with family, friends, mentors from partnering organizations and community leaders. For some, this is the first milestone these individuals have ever completed.

Since 2015 the Back to Work Program has held 41 graduations and graduated 267 graduates with 68% in employed or training.

LOW-INCOME

Individuals receiving SNAP or TANF often face real barriers to employment and sometimes have difficulty finding and keeping living-wage employment. Recognizing the importance of expanding career opportunities that lead to long-term self-sufficiency, DSS provides employment and training services for SNAP and TANF recipients, such as: resume assistance, soft skills development, job search assistance, and referrals to employers and partner organizations. DSS works to assist participants with removing barriers that prevent successful employment and to coach participants through the process of obtaining and retaining employment.

DSS employs Workforce Consultants who work with employers and training providers across the state to develop opportunities for SNAP and TANF recipients that assist them in achieving their highest level of self-sufficiency. Workforce Consultants promote employment as a means of stabilizing the lives of SNAP and TANF recipients in designated areas by encouraging participation in Work Experience activities, DSS' On-the-Job Training program, and the Family Independence Tax Credit in their local area. DSS has recently co-located Workforce Consultants in all SC Works Comprehensive Centers and in several satellite centers.

SNAP Employment and Training (SNAP E&T)

The SNAP Employment & Training (SNAP E&T) program is a Department of Social Services (DSS) initiative designed to expand the state's skilled workforce while increasing employment and training opportunities for participants in the SNAP, formerly known as the Food Stamp program. The SNAP E&T program provides

¹³ University of Arkansas CURRENTS, The Aging Workforce Primary Study Group 34th IRI, 2009.

training and employment opportunities to low-income, working-age individuals to increase their income and ultimately leading to self-sufficiency.

The SNAP E&T program provides federal funding to providers of employment and training services to SNAP participants through a "third-party reimbursement" model. Partner agencies, state agencies, non-profit organizations, foundations and others use non-federal funding for the necessary and reasonable costs of an employment and training component available to SNAP participants and DSS uses that funding to leverage 50 percent federal reimbursement to help pay for partner services.

South Carolina has a large number of SNAP participants who are unemployed or underemployed and may need help with job search training, skills improvement, and education or vocational training that will enhance their opportunities to obtain and retain employment, and advance in the workforce. At the same time, many employers are searching for employees with the necessary skills and abilities to perform the needs of their workforce. The SNAP E&T program is designed to address both the needs of employers for qualified staff and the needs of low-income participants to find meaningful work.

SNAP E&T has ongoing partnerships with state agencies, technical colleges, and community-based organizations across South Carolina. Through the partnership with Adult Education, SNAP E&T recipients can gain skills, training, and work experience that help move them toward self-sufficiency. Emphasis for dually enrolled SNAP/Adult Ed participants is placed on obtaining a high school diploma (HSD) or high school equivalency diploma (HSED), and NCRC™.

In an effort to better align and coordinate programs that help individuals prepare for competitive employment, DSS SNAP E&T employees are co-located in each of the comprehensive SC Works Centers across the State.

Project HOPE

Project HOPE is a collaborative initiative funded by a US Department of Health and Human Services' Health Professions Opportunity Grant (HPOG), which provides funding for training and employment in the allied health field for low-income individuals (TANF and SNAP recipients), veterans, and youth aging out of foster care. (Low-income is defined as an annual income less than 200 percent of the federal poverty level). Project HOPE offers an array of short-term certifications through partnerships with the state's technical colleges which will allow students to move along an educational pathway that leads to higher paying jobs along a career ladder.

Participants must attend a one-week intensive, hands-on academic training session, called a boot camp, at a technical college in one of five locations across the state (Florence, Greenwood, Charleston, Rock Hill or Columbia). During the boot camp, students receive an introduction to healthcare, medical terminology, and CPR training. Project HOPE students also receive job readiness training and employment placement services during the program and again upon completion of their boot camp. Participants are eligible for financial assistance with transportation, child care, uniforms, and employment-related expenses.

Pathways Scholarship Program

The Pathways Scholarship Program (PSP) is a scholarship opportunity available for participants in the SNAP Employment and Training (SNAP E&T) program. These scholarships are awarded to SNAP recipients who wish to further their education and to gain skills and certifications that can lead to employment. The PSP provides scholarships that will pay for tuition and books for SNAP recipients attending any accredited organization that provides employment-related certifications within South Carolina. Since the implementation of the PSP in 2017, the program has provided more than \$363,000 in scholarships resulting in the attainment of 142 certifications across the state.

STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

(B) The Strengths and Weaknesses of Workforce Development Activities. Provide an analysis of the strengths and weaknesses of the workforce development activities in (A), directly above.

South Carolina is fortunate to offer a wide variety of workforce, education and training activities. State leaders, including the Governor, have focused heavily on the need to create a robust and healthy workforce development system leading to sustainable growth, economic prosperity, and competitiveness for individuals, as well as business and industry. The key strengths of the activities identified above are:

STRENGTHS

Willingness to Partner and Collaborate

While there are still opportunities to strengthen partner alignment through co-enrollment and streamlined intake and referral processes, there is also a strong willingness among partners to collaborate to develop a more customer-focused, outcome-driven workforce system. Several of the activities identified above are examples and outcomes of collaboration such as the Integrated Education and Training models being created by Adult Education in partnership with local technical colleges.

Increased Resource Sharing

WIOA core partners co-created guidance to Local Workforce Development Areas on the development of local MOUs and IFAs, and have since participated in local negotiations. As a result of this partnership, the state has seen an increase in the number of partners financially supporting the public workforce system.

WEAKNESSES

Identifying weaknesses is important but addressing them with a strategic approach is vital to overcoming them to ensure a more robust and effective workforce system. Each weakness below is being addressed by one or more objectives and corresponding strategies of the Combined Plan.

Program Alignment and Coordination

There is a wide variety of workforce, education and training activities available in the state; however, there is opportunity for greater alignment and coordination of these activities through policies supporting coenrollment, streamlined intake and referral processes to allow for participation in all services needed for an individual to obtain self-sufficiency.

Access to Services

Many South Carolinians cannot access employment and training services because of a lack of reliable transportation, which also impacts their ability to obtain and maintain employment. Additionally, individuals have other employment barriers such as childcare and housing. While most SC Works programs offer supportive services that address these barriers, there is a need for a more proactive and collaborative approach to providing wrap-around services.

SYSTEM CAPACITY

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

South Carolina is positioned to continue providing high-quality workforce development programs and activities that prepare job seekers for high-demand, high-wage careers. The state's focus on partnership and collaboration will lead to better alignment of programs and resources creating a more customercentered workforce delivery system.

There is at least one comprehensive SC Works Center in each LWDA and one or more satellite centers or access points. Through these centers, individuals and businesses can access resources and services through a variety of programs, including WIOA core programs, as well as the SNAP Employment & Training program, which is co-located in all SC Works comprehensive centers. Center staff is available to assist with filing a claim for UI benefits and provide reemployment assistance, including but not limited to: job search, resume preparation, and interviewing skills workshops. Job seekers and businesses can also access employment services remotely using SC Works Online Services (SCWOS), and individuals can manage their UI benefits through the MyBenefits portal.

Adult Education providers deliver adult education and literacy activities, including GED preparation and testing, through 47 school-district programs, one of which is the Palmetto Unified School District of SC, and six community-based organizations. Adult Education teachers are trained educators who are required to hold and maintain valid SC teacher licenses. Additionally, programs are flexible in meeting the demands of individuals seeking services.

SCVRD has 31 area offices and 25 work training centers across the state. Through a team approach, SCVRD staff work to prepare consumers for employment opportunities within their local labor market, as well as develop relationships with business and industry to individually match consumers with employment opportunities that fit their strengths, abilities, capabilities, and skill sets. Comprehensive programs, including occupational therapy and physical therapy services, rehabilitation engineering, IT training centers, and a residential alcohol and drug recovery center further expand the capacity of SCVRD to meet the individualized needs of eligible individuals with disabilities.

SCCB has 9 area offices across the state through which vocational rehabilitation services for the blind are delivered. SCCB staff work to prepare consumers for employment opportunities within their local labor market, as well as develop relationships with business and industry to individually match consumers with employment opportunities that fit their unique strengths, skills, abilities, capabilities, and informed choice. Through the Ellen Beach Mack Rehabilitation Center consumers learn adjustment to blindness skills such as Braille Literacy, Orientation and Mobility Skills, and Daily Living Skills that support employment and receive individualized and group therapy to deal with emotional adjustment to blindness. SCCB works in partnership with South Carolina's K-12 and higher education systems to enable individuals who are blind or visually impaired to obtain the education and training necessary for employment.

There are a number of education and training opportunities available to job seekers through the technical college system and private providers. The SC Technical College System has a network of 16 technical colleges serving the 46 counties. Many of these colleges have satellite campuses making them accessible to job seekers in rural communities and offer online and non-traditional formats to reach those who cannot participate in the traditional classroom experience.

STATE STRATEGIC VISION AND GOALS

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

STRATEGIC VISION

(1) Vision. Describe the state's strategic vision for its workforce development system.

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

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

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

As a convener of the workforce system, the South Carolina Workforce Development Board is committed to expand and develop a skilled workforce system that meets the needs of business and industry leading to sustainable growth, economic prosperity and regional and global competitiveness for South Carolina. In order to move towards this vision, the State has adopted four objectives.

GOALS/OBJECTIVES

- (2) Goals. Describe the goals for achieving this vision based on the analysis in (a) above of the state's economic conditions, workforce, and workforce development activities. This must include—
 - (A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other populations.
 - (B) Goals for meeting the skilled workforce needs of employers.
- Identify, invest in, and support educational and developmental strategies to better prepare and expand a skilled workforce for current and emerging jobs
- Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners and individuals, including individuals with barriers to employment
- Identify current and future workforce needs of South Carolina business and industry to support career pathways in growth sectors
- Engage job seekers, employers, and other workforce partners through marketing and outreach and articulate a value proposition specific to each

PERFORMANCE GOALS

(3) Performance Goals: Using the table provided in Appendix 1, include the state's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Refer to Appendix 1 for expected levels of performance by program for each of the WIOA Primary Indicators of Performance.

ASSESSMENT OF OVERALL EFFECTIVENESS OF THE WORKFORCE DEVELOPMENT SYSTEM

(4) Assessment: Describe how the state will assess the overall effectiveness of the workforce development system in the state in relation to the strategic vision and goals stated above in

sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

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

STATE STRATEGY

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

STRATEGIES THE STATE WILL IMPLEMENT

(1) Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D).

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

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

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

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

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

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

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

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

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

STRATEGIES TO ALIGN PARTNER PROGRAMS & STRENGTHEN ACTIVITIES

(2) Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2) (Workforce, Education and Training Activities Analysis).

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

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

III. OPERATIONAL PLANNING ELEMENTS

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

STATE STRATEGY IMPLEMENTATION

(a) State Strategy Implementation. The Unified or Combined State Plan must include—

STATE BOARD FUNCTIONS

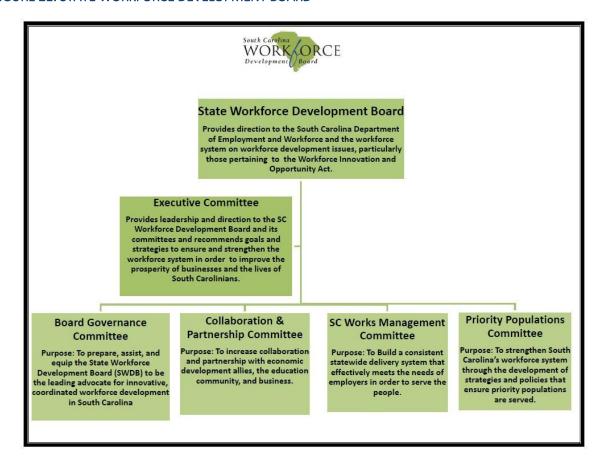
(1) State Board Functions. Describe how the state board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision-making processes to ensure such functions are carried out).

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

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

- The Executive Committee: the "management" arm ensures that deliverables are in line with the Governor's vision for workforce development.
- The Board Governance Committee: the "administrative" arm ensures that the Board is prepared to lead and that outputs align with the Board's strategic plan.
- The Collaboration and Partnership Committee: the "convening" arm brings partners together to identify new opportunities to enhance the workforce system.
- The SC Works Management Committee: the "operations" arm ensures effective and consistent service delivery.
- The Priority Populations Committee: the committee that will strengthen the workforce development system through the development of strategies and policies that ensure priority populations are served.

FIGURE 21: STATE WORKFORCE DEVELOPMENT BOARD



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

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

IMPLEMENTATION OF THE STATE STRATEGY

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

CORE PROGRAM ACTIVITIES

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

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

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

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

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

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

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

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

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

OBJECTIVE 2: Align resources, policies, and strategies between state, local, and regional systems to continuously improve outcomes for businesses, partners and South Carolinians.

STRATEGY 2.1 Increase co-enrollment across partner programs.

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

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

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

STRATEGY 2.3 Streamline intake systems and referral processes.

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

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

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

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

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

website and a resource repository for local partnerships, will serve as action steps that can further this priority.

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

STRATEGY 3.1 Identify the challenges and opportunities in rural communities.

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

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

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

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

STRATEGY 4.2 Improve strategic outreach to employers.

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

ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

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

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

Work Groups and Taskforces: Ad hoc work groups and/or taskforces will be formed to work on specific priorities and action items. Work groups will provide an opportunity for other partners, including local representatives and frontline staff within the centers, to be engaged in the implementation of the state strategy.

COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

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

Co-enrollment in multiple programs can improve outcomes for individuals, especially individuals with barriers to employment. Developing guidance that sets the expectation of enrollment in multiple programs in order to meet the education, training and supportive service needs of individuals will be a key step in fostering an increase in co-enrollment across programs. In an effort to increase co-enrollment of job seekers, state plan partners will evaluate intake and referral processes currently used across the state to identify inefficiencies and best practices, and develop policy to implement process improvements.

COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

Coordinating outreach to employers is one of South Carolina's key strategies serving employers. In support of this strategy, South Carolina will develop a common framework for business engagement that ensures

non-duplication of services. The framework will define the role and composition of local business services teams and include training and professional development for business services staff. Common outreach tools will also be created.

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

PARTNER ENGAGEMENT WITH EDUCATION INSTITUTIONS

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

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

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

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

PARTNER ENGAGEMENT WITH EDUCATION AND TRAINING PROVIDERS

(F) Partner Engagement with Other Education and Training Providers. Describe how the state's strategies will engage the state's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

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

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

LEVERAGING RESOURCES TO INCREASE EDUCATION ACCESS

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

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

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

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

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

IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

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

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

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

COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

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

The SC Department of Commerce, DEW, the SC Technical College System, and the SC Department of Education partner at the State level to ensure regional partnerships have the tools they need to thrive and grow. SC Department of Commerce Regional Workforce Advisors (RWA) and economic alliances partner with workforce and education entities regionally to develop and implement sector strategies.

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

STATE OPERATING SYSTEMS AND POLICIES

(b) State Operating Systems and Policies. The Unified or Combined State Plan must include a description of the state operating systems and policies that will support the implementation of the state strategy described in section II Strategic Elements. This includes—

STATE OPERATING SYSTEMS THAT SUPPORT IMPLEMENTATION

- (1) The state operating systems that will support the implementation of the state's strategies. This must include a description of -
 - (A) State operating systems that support coordinated implementation of state strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).

ADULT, DISLOCATED, AND YOUTH PROGRAMS, TAA, AND WAGNER-PEYSER

South Carolina Works Online Services (SCWOS)

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

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

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

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

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

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

Labor Market Information (LMI)

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

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

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

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

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

Online Job Bank

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

ADULT EDUCATION AND FAMILY LITERACY PROGRAMS

The SC Department of Education (SCDE) Office of Adult Education (OAE) uses the vendor-provided web-based software application Literacy, Adult, and Community Education System (LACES). This system provides day to day academic activity documentation, compiles and produces all reports required by the National Reporting System (NRS) and allows the state office to track performance outcomes.

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

REHABILITATION ACT PROGRAMS

SC Vocational Rehabilitation Department

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

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

SC Commission for the Blind

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

reporting structure search criteria, caseload reports, managed layouts, standardized letters and forms catalog, and caseload activity due reminders.

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

WIOA partners will continue to evaluate the feasibility of adopting an integrated case management, performance, and reporting system that will increase efficiency, reduce duplication of efforts, and improve the level of service to job seekers and employers.

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

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

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

SNAP EMPLOYMENT AND TRAINING

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

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

DATA COLLECTION AND REPORTING PROCESSES

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

ADULT, DISLOCATED, AND YOUTH PROGRAMS, TAA, AND WAGNER-PEYSER

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

System generated reports, as well as our state developed ad hoc reports, are used to evaluate the efficiency, performance, and effectiveness of the workforce system. Reports also help staff identify data issues within the system so that data may be corrected in a timely fashion. Examples of available reports include caseload, Adult priority of service, and aggregate reports that advise on comprehensive oversight

matters such as participants receiving training, participation levels, and Youth five percent limitation/exception in each of the LWDAs and SC Works Centers

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

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

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

REHABILITATION ACT PROGRAMS

SC Vocational Rehabilitation Department

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

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

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

SC Commission for the Blind

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

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

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

SNAP EMPLOYMENT AND TRAINING

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

POLICIES THAT SUPPORT IMPLEMENTATION OF THE STATE STRATEGY

(2) The state policies that will support the implementation of the state's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, describe the state's process for developing guidelines for state-administered one-stop partner programs' contributions to a one-stop delivery system, including benchmarks, and its guidance to assist local boards, chief elected officials, and local one-stop partners in determining equitable and stable methods of funding infrastructure in accordance with sec. 121(h)(1)(B). Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, the state must also include such guidelines.

SC WORKS CENTER CERTIFICATION

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

RAPID RESPONSE MANUAL

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

The Rapid Response Manual was developed and issued in 2019 to establish a comprehensive resource for Rapid Response information and operational guidance, and communicate expectations for delivery of Rapid

Response services statewide across multiple programs. Rapid Response teams are comprised of representatives from the following programs:

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

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

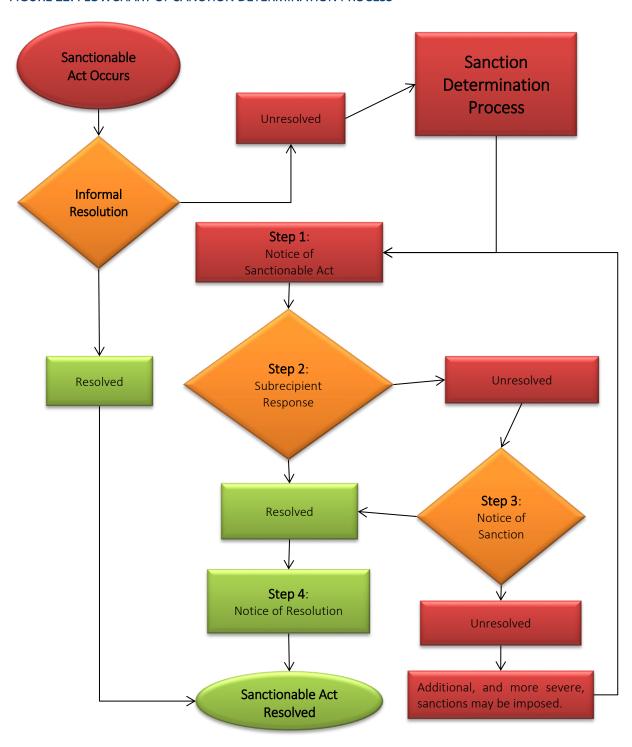
SANCTIONS POLICY

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

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

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

FIGURE 22: FLOWCHART OF SANCTION DETERMINATION PROCESS



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

GUIDELINES FOR RESOURCE SHARING AND INFRASTRUCTURE FUNDING

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

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

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

STATE PROGRAM AND BOARD OVERVIEW

(3) State Program and State Board Overview.

STATE AGENCY OVERVIEW

(A) State Agency Organization. Describe the organization and delivery systems at the state and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

South Carolina Department of Employment and Workforce (DEW)

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

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

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

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

FIGURE 23: SOUTH CARLINA DEPARTMENT OF EMPLOYMENT AND WORKFORCE

SC Department of Employment and Workforce

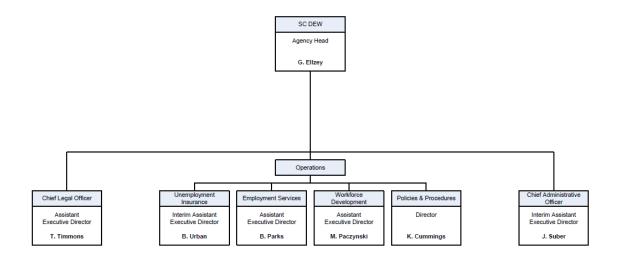


FIGURE24: SOUTH CAROLINA LOCAL WORKFORCE DEVELOPMENT AREAS



South Carolina Vocational Rehabilitation Department (SCVRD)

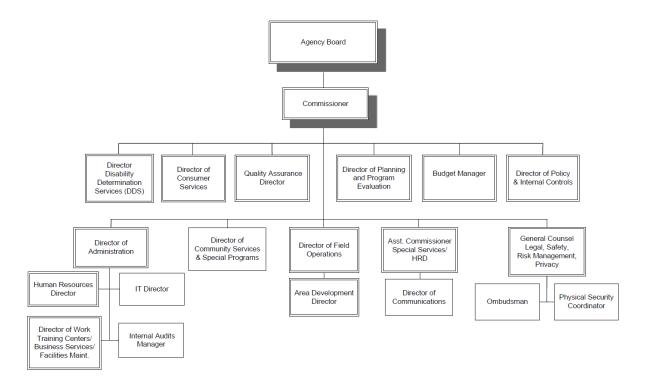
The SCVRD board sets policy under which the Vocational Rehabilitation Department operates. Board members are appointed by the Governor and confirmed by the Senate, serving seven-year terms.

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

The SCVRD State Office consists of the following Departments: Administration; Area Operations; Client Services; Facility Planning and Management (Buildings and Grounds); Finance Operations; Grants and Funds Management; Human Resources; Human Resource Development; Internal Audits; Information Technology; Job Readiness Training Center Services; Legal, Safety, and Risk Management; Planning and Program Evaluation; Procurement and Facilities Services; and Public Information.

FIGURE 24: SOUTH CAROLINA VOCATIONAL REHABILITIATION DEPARTMENT

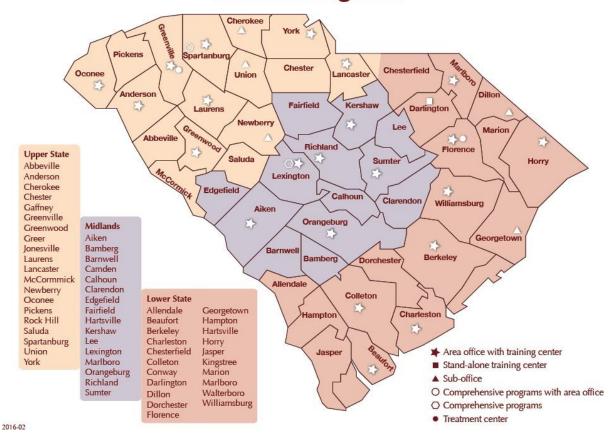
South Carolina Vocational Rehabilitation Department



Rev. 02-24-2020

FIGURE 26: SCVRD REGIONS

SCVRD Regions



South Carolina Commission for the Blind (SCCB)

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

The Commission operates 10 local area offices through which services are provided to all eligible individuals who desire to enter or maintain competitive integrated employment. The Ellen Beach Mack Rehabilitation Center in Columbia provides comprehensive adjustment to blindness services including personal adjustment to blindness, orientation and mobility skills, daily living skills, Braille literacy skills, and prevocational training on the use of Assistive Technology devices. SCCB counselors, Adjustment to Blindness Instructors, Vocational Evaluators, and Employment Consultants work to prepare consumers for employment opportunities within their local labor market. Employment Consultants build relationships with business in order to provide talent acquisition and talent retention services. In addition, the Commission manages a state-funded Blindness Prevention Program, Independent Living Program, the Older-Blind Program, Low Vision Clinics, and the Business Enterprise Program.

FIGURE27: SOUTH CAROLINA COMMISSION FOR THE BLIND BOARD

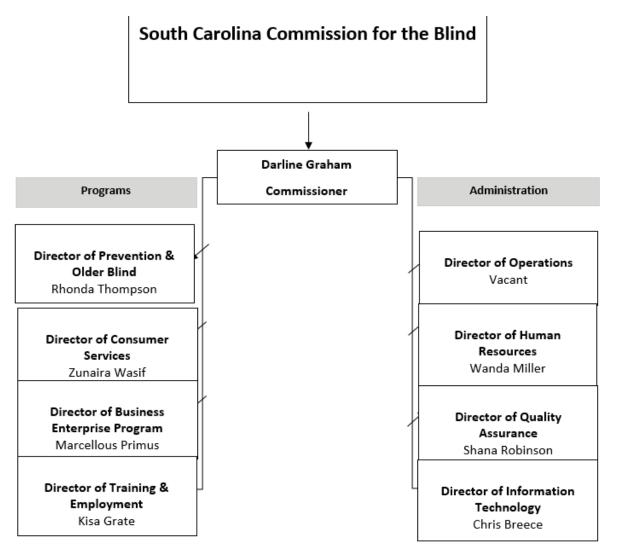
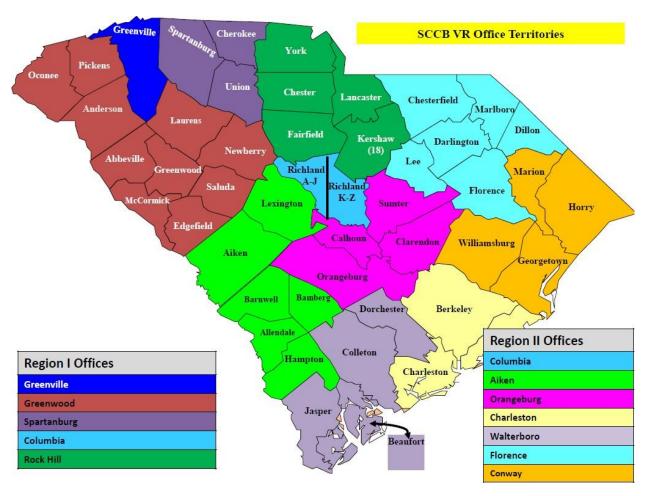


FIGURE28: SCCB VOCATIONAL REHABILITATION OFFICE TERRITORIES



SC Department of Education, Office of Adult Education

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

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

FIGURE29: ADULT EDUCATION TECHNICAL ASSISTANCE NETWORKS

Adult Education Technical Assistance Network (TAN)

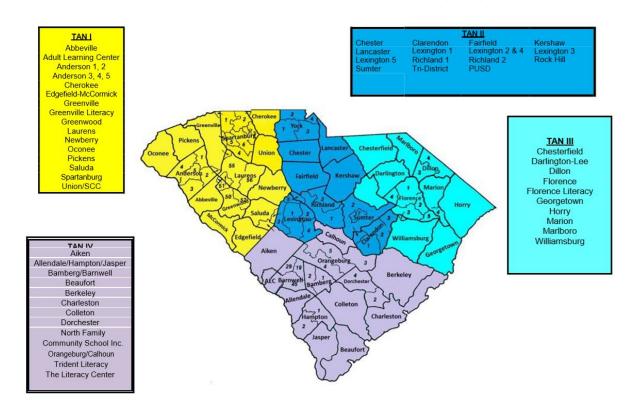
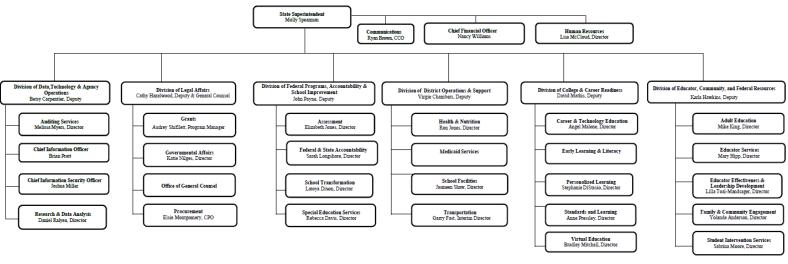


FIGURE30: SOUTH CAROLINA DEPARTMENT OF EDUCATION ORGANIZATIONAL CHART



South Carolina Department of Education • Organizational Chart



SC Department of Social Services

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

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

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

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

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

- The Temporary Assistance for Needy Families (TANF) program provides transportation, child care
 assistance, job training, employment activities, and other support services while simultaneously
 receiving case management and cash assistance. Using a holistic approach, case managers work
 to promote self-sufficiency for the benefit of the entire family.
- The Supplemental Nutrition Assistance Program Employment and Training Program provides support services to SNAP recipients in an effort to increase their long-term employability.
 Support services include childcare, transportation, job retention services, and rent assistance, among others.
- Project HOPE provides education and training to low-income individuals for occupations in healthcare that pay well. Project HOPE is a Health Profession Opportunity Grant (HPOG) funded by the U.S. Department of Health and Human Services' (DHHS) Administration for Children and Families (ACF). The target populations for Project HOPE include TANF and SNAP recipients, lowincome individuals, youth aging out of foster care, and veterans.

FIGURE 31: SC DEPARTMENT OF SOCIAL SERVICES ORGANIZATIONAL CHART



STATE BOARD OVERVIEW

(B) State Board. Provide a description of the State Board, including---

Membership Roster

(i) Membership Roster. Provide a membership roster for the State Board, including members' organizational affiliations.

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

Governor:

Honorable Henry McMaster

Members of Each Chamber of the State Legislature:

Senator: Senator Ross Turner

Representative: Representative Mike Forrester

Representatives of Business:

Chairman, Donald Tomlin

Prisma Health, Valerie Richardson

Pee Dee Food and MEM, Nick P. Foong

ASSA ABLOY Entrance Systems, Thomas Freeland

Find Great People, John Uprichard

OCS Garage Doors and Hurricane Services, James Holloway

U-Save Auto Rental, Archie Maddox

Piedmont Bushings and Insulators, LLC, Michael Sexton

Schaeffler, Gregory Tinnell

Cooper Standard, James Snead

Southeastern Freight, Clifford Bourke

Clemson University, Dr. Windsor Sherrill

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

International Longshoremen Association, Charles Brave

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

Community Based Organizations:

Goodwill Industries of the Upstate/Midlands, Pat Michaels Gleams, HRC, Inc., Dr. Joseph Patton

Transitions Colonel Craig Currey

Core Partners:

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

Department of Education, Mike King (Adult Education)

Vocational Rehabilitation, Felicia Johnson (Vocational Rehabilitation)

Chief Elected Officials:

Vacant

Additional Workforce Partners:

SC Technical College System, Dr. Tim Hardee

Central Carolina Technical College, Dr. Gregory M. Mikota

Standing Committees

The Board executes its functions through four standing committees:

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

• equipping SWDB members with resources and tools to be leaders and drivers of workforce development;

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

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

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

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

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

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

- promoting outreach efforts to all WIOA priority populations with a focus on youth with barriers, ex-offenders, veterans, individuals with disabilities, homeless, and long-term unemployed;
- working with the Priority Populations Coordinator to establish a written strategic plan and subsequent policies to support WIOA Youth program services;
- developing benchmarks and baseline standards to measure and evaluate the effectiveness of programs and services for individuals with barriers to employment;
- initiating statewide operational practices to improve service delivery to priority populations; and

• improving communication with appropriate agencies, non-profits, the faith community, and other community-based organizations that already serve priority groups.

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

Term Limits

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

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

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

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

- Representatives of Business
- Representatives of Labor
- Representatives of Community-Based Organizations

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

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

BOARD ACTIVITIES

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

Training and Professional Development

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

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

Quarterly Meetings

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

Strategic PLanning

In September 2017, SWDB completed a 3-year strategic plan, "Strategies to Build a Competitive Workforce". The strategic plan is the blueprint for the SWDB to build policies, align programs, and invest

in workforce development. Each committee has an action plan which aligns the committee purpose and specific functions to the execution of the strategic plan.

ASSESSMENT AND EVALUATION

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

ASSESSMENT OF CORE PROGRAMS

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

WIOA PRIMARY INDICATORS OF PERFORMANCE

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

Annual and Interim Reporting on the WIOA Primary Indicators of Performance

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

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

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

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

STATE OR PROGRAM SPECIFIC INDICATORS OF PERFORMANCE

Participant Cost Rate

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

Fund Utilization

The Fund Utilization Policy (State Instruction Letter 17-05)) requires each LWDB to meet an annual 70 percent fund utilization rate for each of the WIOA Title I funding streams (Adult, Dislocated Worker, and

Youth). The rate is calculated by dividing total program and administration expenditures by total available funds (carry-in and current annual allocation) for each funding stream.

Priority of Service

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

COMPLIANCE MONITORING AND TECHNICAL ASSISTANCE

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

ASSESSMENT OF SC WORKS PROGRAMS

(B) Assessment of One-Stop Partner Programs. Describe how other one- stop and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

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

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

PREVIOUS ASSESSMENT RESULTS

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

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

EVALUATIONS AND RESEARCH PROJECTS

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

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

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

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

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

DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

(5) Distribution of Funds for Core Programs. Describe the methods and factors the state will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

TITLE I PROGRAMS

- (A) For Title I programs, provide a description of the written policies that establish the state's methods and factors used to distribute funds to local areas for
 - (i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),
 - (ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

(iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

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

YOUTH FUNDS

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

ADULT FUNDS

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

DISLOCATED WORKER FUNDS

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

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

HOLD HARMLESS

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

TITLE I FINANCIAL REPORTING REQUIREMENTS

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

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

TITI F II PROGRAM

(B) For Title II:

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

MULTI-YEAR GRANTS AND CONTRACTS

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

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

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

Initially, AEFLA grant funds for all three sections (231 funds, 225 funds, and 243 funds) were awarded to eligible providers for a three-year period, July 1, 2018 to June 30, 2021. Official grant award documents will be processed annually as continuation of funding is not automatic. In determining continuation funding, the SCDE considers the subgrantee's evidence of a project's effectiveness in achieving objectives, program

performance, timely submission and quality of all required reports (including Interim and Annual Progress Reports), and the rationale for budget expenditures. A continuation application may be required.

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

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

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

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

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

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

Considerations for Funding

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

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

DIRECT AND EQUITABLE ACCESS

(ii) Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is

using the same grant or contract announcement and application procedure for all eligible providers.

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

The SC Department of Education holds full and open competitions consistent with the standards of CFR 200.319. SCDE ensures compliance with all state and federal laws regarding the awarding of contracts and the expenditure of public funds as well as requirements outlined in Title II of the Workforce Innovation & Opportunity Act of 2014.

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

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

South Carolina Department of Education - OAE will hold a full and open competition consistent with the standards of CFR 200.319. All eligible agencies will be granted direct and equitable access to apply and compete for grants or contracts. The OAE will be in compliance with all state and federal laws regarding the award of contracts and the expenditure of public funds. The following steps will be initiated to ensure direct and equitable access:

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

The announcement will contain information such as:

- Type of grants available
- Contact person to obtain RFP guidelines
- Timeline with grant application due date
- Other pertinent items
- Any information required by state law in regard to the awarding of contracts and the expenditure of public funds

TITLE IV PROGRAMS

(C) Title IV Vocational Rehabilitation. In the case of a state that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a state agency to administer the part of the Vocational Rehabilitation

(VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the state to determine the distribution of funds among the two VR agencies in the state.

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

PROGRAM DATA

(6) Program Data

DATA ALIGNMENT AND INTEGRATION

- (A) Data Alignment and Integration. Describe the plans of the lead state agencies with responsibility for the administration of the core programs, along with the state board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the state's plan for integrating data systems should include the state's goals for achieving integration and any progress to date.
 - (i) Describe the state's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.

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

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

INTEGRATING DATA SYSTEMS

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

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

STATE BOARD ROLE IN ALIGNING TECHNOLOGY AND DATA SYSTEMS.

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

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

DEVELOPING AND PRODUCING REPORTS

(iv) Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section116(d)(2)).

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

TITLE I ADULT, DISLOCATED WORKER, AND YOUTH AND TITLE III WAGNER-PEYSER ACT PROGRAMS

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

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

Quarterly reports are issued by the Workforce Support department which outline the position of each LWDA in regards to their performance and the South Carolina specific additional financial performance measures.

ASSESSMENT OF POST PROGRAM SUCCESS

(B) Assessment of Participants' Post-Program Success. Describe how lead state agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

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

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

USE OF UNEMPLOYMENT INSURANCE WAGE RECORD DATA

(C) Use of Unemployment Insurance (UI) Wage Record Data. Explain how the state will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and state law. (This Operational Planning element applies to core programs.)

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

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

PRIVACY SAFEGUARDS

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

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

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

PRIORITY OF SERVICES FOR VETERANS

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

In accordance with the Jobs for Veterans Act, veterans and eligible spouses are given priority of service in employment and training programs funded in whole or in part by the USDOL. Priority of service means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services and that a veteran or an eligible spouse either receives access to services earlier in time than a non-covered person, or, if the resource is limited, the veteran or eligible spouse receives access to the services instead of the non-covered person.

The state monitors priority of service for veterans and eligible spouses by ensuring that local workforce areas have implemented appropriate priority of service policies. Local policies are assessed to determine the following:

- whether the policy explains the differences between Veterans' Services and priority of service for veterans and eligible spouses;
- whether the policy describes the roles and responsibilities of SC Works Center staff and management as they pertain to Veterans' Priority of Service; and,
- whether the policy demonstrates appropriate actions for showing priority of service to veterans and eligible spouses for Department of Labor funded programs in SC Works Centers.

SCDEW conducts on-site evaluations of local SC Works Centers to determine the efficiency and effectiveness of internal processes. SCDEW monitors assess SC Works Center staff practices to determine whether the entitlement to priority of service is entirely explained and what actions are taken at points of entry to show preference.

Additionally, veterans receive a 24-hour period of priority for jobs listed with the SC Works system. This means that all qualified veterans and eligible persons will have the opportunity to view and receive referrals prior to non-covered persons.

The state has issued guidance regarding services under the Disabled Veterans' Outreach Program (DVOP). DVOP staff must limit their activities to providing services to eligible veterans and eligible spouses who:

- meet the definition of an individual with a significant barrier to employment (SBE), as defined and updated by DOL, or
- are members of a veteran population identified by the Secretary of Labor as eligible for DVOP services, currently defined as veterans aged 18 to 24.

Per state guidance, an eligible veteran or eligible spouse who is identified as having a SBE must be immediately referred to a DVOP specialist. Veterans ages 18 to 24 must also be referred to DVOP specialists. In instances where a DVOP specialist is not available, referrals to a SCDEW career development specialist will be made. DVOP specialists will conduct an initial assessment to determine if the veteran or eligible spouse will benefit from the provision of case management. In the event that case management is determined not suitable, the DVOP will refer the veteran or eligible spouse to the other program staff who would best be able to meet their needs.

Veterans with an SBE and those aged 18 to 24 must have access to all appropriate SC Works services and are not limited to receiving services only from DVOP specialists. Additionally, veterans and eligible spouses who do not meet the SBE definition or are not within a specified category identified by the Secretary of Labor, are to be referred to appropriate non-JVSG SC Works staff member(s) to receive services, on a priority basis.

ACCESSIBILITY OF THE SC WORKS DELIVERY SYSTEM

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

certification policy, particularly the accessibility criteria. (This Operational Planning element applies to core programs.)

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

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

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

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

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

SC Department of Education Office of Adult Education has a special education task force that creates and delivers training for adult education practitioners serving students with special needs. The OAE meets regularly with SCDE Office of Special Education Services to ensure compliance with all special education regulations. Additionally, OAE requires that all funded local providers have a written plan with local Special Education Departments to transition IEP (Individualized Education Plan) students, and that local providers comply with the General Education Provisions Act (GEPA) which requires each provider to describe the steps they propose to take to ensure equitable access to, and participation in, its federally assisted programs. OAE monitors for compliance with the written transition IEP as part of its annual compliance process and collaborates with the Office of Special Education to monitor all other GEPA requirements.

As a condition of partnering with SCVRD, other organizations are informed of their obligation to comply with applicable Civil Rights laws and regulations. Postsecondary training vendors are required to complete SCVR 153 – Assurance of Compliance with Section 504 of the Rehabilitation Act of 1973, as amended. This form acknowledges that the training vendor complied with Section 504, which ensured that individuals

with disabilities have equal access to any federally funded program. The form is signed by the training vendor when the initial application is submitted for approval. Similarly, applicants, eligible individuals, and other interested persons are also informed in writing that services are provided on a nondiscriminatory basis, as required by Title VI of the Civil Rights Act, as amended, and Section 504 of the 1973 Rehabilitation Act, as amended. Additionally, all staff members are required to complete the Office of Civil Rights training modules.

As part of the SC Works center certification process, LWDBs are required to evaluate accessibility of the SC Works delivery system. SC Works centers were evaluated in 2017 and will be re-evaluated every three (3) years thereafter as required by WIOA. In order to be certified according to the SC Works certification standards, each center must meet the following accessibility baseline measures:

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

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

ACCESSIBILITY OF THE SC WORKS DELIVERY SYSTEM FOR ENGLISH LANGUAGE LEARNERS

(9) Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners. Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

Languages other than English are identified at the point of first contact through Census language identification flash cards. To ensure the accurate transmittal of information, individuals with Limited English Proficiency (LEP) are provided services via a qualified interpreter service when qualified bilingual staff is not available. Each LWDA has submitted an LEP Plan of Action outlining procedures on identifying customer language needs, provision of services in the language identified, and the right to free language assistance. The LEP Plan of Action is an ongoing process identifying procedures to meet the needs of LEP customers. A Request for Interpreter Service form has been made available to expedite the interpreter request process. Training on the provision of services to LEP individuals, as well as current interpretation resources and other materials, are provided on an ongoing basis. LEP individuals are notified of their rights under law via posters in Spanish and other significant language groups identified within each LWDA. As part of the SC Works center certification process, LWDBs are required to evaluate LEP accessibility.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

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

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

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

The Combined State Plan was published on February 28, 2020 for public comment.

Title I: Adult, Dislocated Worker, and Youth Activities

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

(a) General Requirements

(1) Regions and Local Workforce Development Areas.

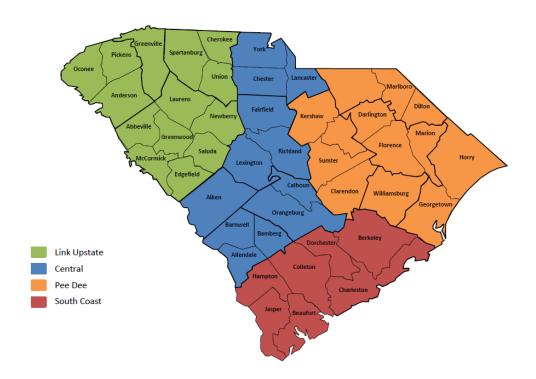
(A) Identify the regions and the local workforce development areas designated in the State.

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

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

FIGURE 1: SOUTH CAROLINA WIOA PLANNING REGIONS

South Carolina Regional WIOA System



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

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

State Instruction 15-08, Regional Identification, provides an overview of the process used to identify planning regions. In making this determination, the state considered the factors listed in Sec. 106(b)(1)(B): the extent to which the local areas in a proposed region are consistent with labor market areas in the state, are consistent with regional economic development areas in the state, and have available the federal and non-federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of WIOA. This also includes whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools. South Carolina also considered population centers, labor force conditions, commuting patterns, industrial composition, location quotients, geographic boundaries, income, poverty, educational attainment, and indemand occupation groups.

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

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

State Instruction 14-05 outlines the local area designation appeals process and provides that if an existing workforce area requests but is not granted designation as a LWDA, the unit of general local government or grant recipient may submit a written appeal to the State Workforce Development Board within 20 days of receiving written denial notification. Appeals submitted after this time will not be considered. The appealing entity must explain why it believes the denial is contrary to the provisions of Section 106(b)(2) of WIOA. No other cause for appeal will be considered under this section. The State Workforce Development Board must consider and respond in writing to such an appeal within 20 days of its receipt.

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

If the Local Board and required partners fail to reach consensus on funding infrastructure costs under the Local Funding Mechanism (LFM), the State Funding Mechanism (SFM) is triggered. Under the SFM, the Governor is required to determine the partners' contributions for infrastructure costs for local areas that

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

State Funding Mechanism Steps:

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

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

South Carolina Department of Employment and Workforce Attn: Appeals, State Workforce Development Board 1550 Gadsden Street Columbia, SC 29201

(2) Statewide Activities.

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

Policies or Guidance for the Statewide Workforce Development System

While there isn't a policy for the use of state funds specifically, South Carolina has a number of policies that govern the workforce development system, both at the state and local levels. Active and expired policies can be downloaded through the SC Works website.

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

Statewide Activities

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

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

State Administration

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

Use of Rapid Response Funds

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

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

- Stage 1: Discovery and Notification. Once the Rapid Reemployment Team receives notification of
 a potential layoff or closure, the team assesses the situation by gathering information/facts,
 preparing materials, and identifying potential tactics for layoff aversion and analyzing industry and
 occupational trends to identify whether the business and impacted workers will need short-term
 or more sustainable services.
- Stage 2: Management Meeting. At an initial meeting, circumstances for the anticipated layoff are discussed along with the demographics of affected workers. Descriptions of Group Informational Sessions and Onsite Services are provided to the employer.
- Stage 3: Group Informational Sessions. The purpose of this session, is to inform impacted workers of available reemployment services and prepare them for job search activity prior to their anticipated layoff.
- Stage 4: Onsite Reemployment Services. This provides customized services which address workers' unique needs for reducing unemployment. These services consist of resume building, interviewing skills, job searching, SCWOS registration, computer literacy, UI portal registration, and job fairs.

The Rapid Response team works closely with the Existing Industry Division at the South Carolina Department of Commerce (SCDOC). The Existing Industry Division provides referrals and coordinates with

the DEW Rapid Response team to provide services to employers who may be experiencing a layoff or closure.

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

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

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

Natural Disaster Rapid Response

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

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

TAA/Rapid Response Early Intervention

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

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

Rapid Response team emphasizes how the partner agency staff representatives will be working together as a team to offer the customer individualized and comprehensive reemployment benefits and services.

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

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

Utilization of Rapid Response Funds for TAA Eligible Individuals

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

(b) Adult and Dislocated Worker Program Requirements

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

Work-based Training Models

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

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

Registered Apprenticeship

The growth of Registered Apprenticeship in South Carolina has been phenomenal and because of its innovative approach and fast growth, Apprenticeship Carolina $^{\text{m}}$ is held as a model for the nation.

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

The Palmetto Academic Training hub (PATh) a major resource used in advertising and connecting individuals to registered apprenticeships. PATh is used to make program information about registered

apprenticeships available to the public. Title I case managers use the list of registered apprenticeships to inform participants of the career and training options available.

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

Training Provider Eligibility

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

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

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

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

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

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

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

Initial Eligibility and Application Process for New Training Providers

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

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

- A completed ETPL application in PATh, which must include:
 - o Descriptions of each program of training services to be offered;
 - o Identification of businesses that developed the training in partnership with the provider, if any;
 - o Information on cost of attendance, including costs of tuition and fees;
 - Evidence indicating the training program leads to an industry recognized certificate or credential, including any recognized post-secondary credentials;
 - O Description of how the program of training services aligns with in-demand industry sectors and occupations, to the extent possible;
 - O Description of the accessibility of training services throughout the state, including in rural areas, and through the use of technology;
 - O Documentation of compliance with all state licensure requirements and the current licensing status, as applicable;
 - O Description of the program's demonstrated effectiveness in serving employed individuals and individuals with barriers to employment; and
- A signed Memorandum of Agreement (MOA) in which the provider agrees to share data with the State pertaining to training outcomes, including individual student coursework and other Personally Identifying Information (PII) to match training and employment data and outcomes for all students, including WIOA-funded students and non-WIOA-funded students.

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

Continued Eligibility Application Process

After the initial eligibility period of one (1) year, the training provider, with the exception of registered apprenticeship program sponsors, must submit an application for continued eligibility for each program of training and resubmit every year thereafter. The continued eligibility application requirement ensures that training provider and program information is accurate and performance reporting standards are met. The continued eligibility application is required for any program of training that has been previously approved

for the ETPL. A system generated email notification will be sent to the provider's listed point of contact 60 days prior to the expiration of a program's approval status.

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

- Any changes to provider or program information previously approved must be submitted, including
 a current program description, breakdown of tuition costs and fees, credentials to be attained, and
 contact information;
- A signed MOA in which the provider agrees to share data with the State pertaining to training outcomes, including individual student coursework and other PII to match training and employment data and outcomes; and
- Evidence that the previously approved training provider has submitted performance reports annually and in a timely manner.

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

Registered Apprenticeship

Apprenticeship programs registered with the U.S. Department of Labor's, Office of Apprenticeship, are automatically eligible to be included on the ETPL. While automatically eligible, a registered apprenticeship program sponsor must first indicate their interest in being included on the ETPL. Registered apprenticeship program sponsors may request, at any time, to be added to the ETPL as an approved training provider. Any such requests must be communicated to DEW through the completion of an abbreviated application accessed through the PATh online system. For inclusion on the ETPL, registered apprenticeship program providers must provide the following information:

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

Registered apprenticeship program sponsors that do not provide the RTI portion of the apprenticeship program may be requested to provide additional information about their education provider, including the cost of the instruction. Registered apprenticeship program sponsors that request to be included on the ETPL will remain as long as the program is registered or until the program sponsor submits notification that it no longer wishes to be on the list.

Registered Apprenticeship programs are not subject to the same eligibility, performance, or reporting requirements as other training providers since they go through a detailed application, vetting, and monitoring process with the USDOL. Registered apprenticeship programs are exempt from WIOA

performance and reporting-related requirements, including the requirements for annual eligible training provider reporting, enabling these programs to be placed on the ETPL with minimal burden.

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

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

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

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

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

(5) Describe the state's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

Criteria for Local Transfer of Funds

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

(c) Youth Program Requirements.

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

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

State Criteria for Awarding Grants to Youth Providers

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

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

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

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

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

Understanding that youth providers may not be able to directly offer each of the 14 elements described in WIOA section 129(c)(2), youth providers will be responsible for connecting with other workforce and community partners to achieve a holistic service delivery model. It is imperative that providers communicate closely with agencies and organizations that serve similar populations to allow for coenrollment where appropriate and leveraging of resources. As formula funding has seen a decrease, local areas are faced with the challenge of providing quality services to individuals in need with less staff and financial resources. Providers must be imbedded in their respective areas to build mutually beneficial partnerships that generate referral processes, space sharing, and alternative funding.

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

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

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

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

Strategies to Improve Outcomes for Out of School Youth

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

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

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

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

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

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

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

Availability of Program Elements

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

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

Policy for Requiring Additional Assistance

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

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

State Definition for Not Attending/Attending School

State law does not define "not attending school" or "attending school." However, South Carolina compulsory education laws require children to attend regularly a public or private school or kindergarten which has been approved by the State Board of Education, a member school of the South Carolina Independent Schools' Association, a member school of the South Carolina Association of Christian Schools, or some similar organization, or a parochial, denominational, or church-related school, or other programs which have been approved by the State Board of Education from the school year in which the child is five years of age before September first until the child attains his seventeenth birthday or graduates from high school.¹

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

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

Definition for Basic Skills Deficient

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

(d) Waiver Requests.

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

- (1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;
- (2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;
- (3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;
- (4) Describes how the waiver will align with the Department's policy priorities, such as:

¹ SC Code, § 59-65-10.

- (A) supporting employer engagement;
- (B) connecting education and training strategies;
- (C) supporting work-based learning;
- (D) improving job and career results, and
- (E) other guidance issued by the Department.
- (5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and
- (6) Describes the processes used to:
 - (A) Monitor the progress in implementing the waiver;
 - (B) Provide notice to any local board affected by the waiver;
 - (C) Provide any local board affected by the waiver an opportunity to comment on the request;
 - (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
 - (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.
- (7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

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

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

Actions taken to remove barriers

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

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

recommendations for legislation requiring student and other economic and workforce development data be shared as allowable by governing entities. Draft legislation for a data governance structure for education and workforce development partners has been developed and approved by the CCWD, which is planned to be introduced in the next SC legislative session. Members of the General Assembly have expressed a desire for a longitudinal data system to aide in workforce development and evidence-based policy making.

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

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

Goals, outcomes, and benefits related to this waiver request include:

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

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

Individuals Impacted by the Waiver

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

Monitoring and Implementation

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

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

Annual Report

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

While performance information on all students was strongly encouraged but not required by South Carolina for PY'18, the review of WIOA participant performance data continued. Reports have been utilized and communicated on a consistent basis with Local Workforce Development Areas (LWDAs) regarding: total number of participants served, total number of participants who received training, median earnings, credential rate, measurable skill gains, employment rate Q2 and Q4 measures.

Notice to Local Boards and Public Comment

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

Title II: Adult Education and Family Literacy Program

The Unified or Combined State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under title II, the Adult Education and Family Literacy Act (AEFLA)

(a) Aligning of Content Standards. Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with state-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The South Carolina Adult Education Curriculum Framework was developed to assist local programs with aligning their curriculum to the South Carolina College- and Career-Ready Standards (SCCCR) and the College and Career Readiness Standards (CCR) for Adult Education. The Curriculum Framework aligns the SCCCR Standards and the CCR Standards for English-Language Arts (Reading, Language, and Writing) and Mathematics with the current adult skills and literacy assessments used in South Carolina and the standards and academic requirements for enrollment in non-remedial, for-credit courses in postsecondary educational institutions. The Curriculum Framework is organized by Educational Functioning Level (EFL) and identifies the skills and standards in which students need to demonstrate proficiency in order to complete each level.

Local adult education programs follow the standards-based classroom model of instruction to provide a personalized learning environment to empower students and help them achieve their academic and personal goals. Instructors use diagnostic tools and assessments to determine Educational Functional Levels (EFL) to identify the needs of their individual learners and use these diagnostics to develop individual curricula for each student that includes the knowledge and skills needed to achieve a Measurable Skill Gain and to be prepared for entry into postsecondary education, training, or the workforce.

Ongoing professional development and training opportunities in designing and implementing standardsand research-based instruction for reading, writing, speaking, mathematics are provided at the state, regional, and local program levels throughout the year.

(b) Local Activities. Describe how the state will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

Adult education;

Literacy;

Workplace adult education and literacy activities;

Family literacy activities;

English language acquisition activities;

Integrated English literacy and civics education;

Workforce preparation activities; or

Integrated education and training that—

- 1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
- 2. Is for the purpose of educational and career advancement.

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

South Carolina Department of Education serves as the administrative/fiscal agent for Title II Adult Education and Family Literacy Act (AEFLA). As administrative/fiscal agent, SCDE will solicit service providers to provide services to eligible individuals who:

- (a) have attained 16 years of age;
- (b) are not enrolled or required to be enrolled in secondary school under the SC Compulsory School law; and
- (c) are basic skills deficient;
- (d) do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
- (e) are English language learners.

All activities funded under WIOA are authorized, approved and overseen by the South Carolina Department of Education, Office of Adult Education.

The following organizations are eligible to apply to the South Carolina Department of Education, Office of Adult Education for federal funds provided they have demonstrated effectiveness in providing adult education and literacy services:

- 1. a local educational agency (LEA, i.e., school district);
- 2. a community-based organization or faith-based organization;
- 3. a volunteer literacy organization;
- 4. an institution of higher education;
- 5. a public or private nonprofit agency;
- 6. a library;
- 7. a public housing authority;
- 8. a nonprofit institution that is not described in any of items 1. through 7. and has the ability to provide adult education and literacy activities to eligible individuals;
- 9. a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in any of items 1. through 8.; and
- 10. a partnership between an employer and an entity described in any of items 1. through 9.

An eligible provider must show demonstrated effectiveness in providing adult education and literacy

activities by submitting:

- a. <u>Performance Record</u>—a minimum of two consecutive years of performance data (within the previous five years) on improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of
 - Reading,
 - Writing,
 - Mathematics, and
 - English language acquisition.
- b. <u>Participant Outcomes</u>— a minimum of two consecutive years of data and/or information (within the previous five years) on outcomes for participants related to
 - Employment,
 - Attainment of secondary school diploma or its recognized equivalent, and
 - Transition to postsecondary education and training.

Special Rule: Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under state law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

By federal law, providers are prohibited from using federal funds to supplant state or local dollars. All federal funding will be used to enhance learner services, as outlined in this Plan. South Carolina Department of Education, Office of Adult Education, will conduct competitions under WIOA upon receiving guidance from the US Department of Education, Office of Career, Technical, and Adult Education.

Awards to eligible providers will be made through the Request for Proposal (RFP) applications process. To help ensure direct and equitable access to funds for adult literacy and basic skills activities, RFPs will be announced directly to providers and through multiple media outlets. In addition, all providers will be considered for grants based on the same criteria. These criteria are aligned with the directions contained in this Plan and the thirteen considerations required by federal legislation. After the initial three-year grant, all grants will be awarded on a four-year basis. Future efforts will be made to assess what support eligible providers might need in order to implement this Plan and broaden the discussion of how these needs can be met.

South Carolina Department of Education, Office of Adult Education, will use the following process to distribute funds to approved applicants:

Not less than 82.5 percent of the grant funds to award grants and contacts under section 231. Local assistance grants will be distributed based on the ability to meet the requirements of AEFLA Purposes outlined in WIOA: (1) Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; (2) Assist adults who are parents or family members to obtain the education and skills that (a) are necessary to becoming full partner in the education development of their children and (b) Lead to sustainable improvements in the economic opportunities for their family; (3) Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training including through career pathways; (4) Assist immigrants and other individuals who are English language learners in (a) improving their reading, writing, math, speaking, and comprehension skills in

English and mathematics skills, and (b) acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship.

Allowable Costs: All allowable costs for the federally funded Adult Basic Education program are defined in the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards subpart E (2 CFR Part 200). This will be the document of determination for reasonableness, allowability, and allocability of costs. All costs must be supported by source documentation including cancelled checks, paid bills, payrolls, time and attendance records, purchase orders and signed copies of sub-grant award documents. South Carolina purchasing, and procurement laws must be followed by South Carolina School Districts or other state agencies in the acquisition of all goods associated with the sub-grant. The scope of Adult Education services covers South Carolina's 79 school districts. Adult education provides flexible scheduling to accommodate student needs. Programs are organized to meet the literacy needs of local populations across the state.

As the eligible agency to receive AEFLA funds, in accordance with WIOA Title II (<u>Sec. 231</u>), we will require that each eligible provider use the grant to establish or operate one or more programs that provide services or instruction in one or more of the following categories:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training

South Carolina requires that *all* sub-grantees for the Adult Education Grant to provide adult education, literacy, workplace adult education and literacy, and workforce preparation. These same sub-grantees must also develop integrated education and training processes that are based on employment need for the state, region, or for specific employers.

WIOA Title II (<u>Sec. 231</u>) defines Adult Education as academic instruction and education services below the postsecondary level that increase an individual's ability to:

- a) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;
- b) transition to postsecondary education and training; and
- c) obtain employment

Local adult education programs offer the following Adult Education and Literacy Activities:

ADULT EDUCATION

Adult Basic Education Program

Adult Basic Education instruction is designed for an adult who lacks competence in reading, writing, speaking, problem solving, or computation at a level necessary to function in society, on a job, or in a family.

Adult Secondary Education

Adult Secondary instruction is designed for adults who have some literacy skills and can function in everyday life but do not have an equivalent to a secondary school diploma.

LITERACY ACTITIVIES

This is a program designed to teach an individual to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

WORKPLACE ADULT EDUCATION AND LITERACY ACTIVITY

Local eligible providers offer these services for the purpose of improving the productivity of the workforce in their area through raising the basic skills level. Employers work with our programs and some sponsor classes at their worksites while others send them to regular adult education classes. This further allows us to provide adult education activities concurrently and contextually with any workforce preparation activities and workforce training for either a specific occupation or cluster.

Generational Family Services

Generational Family Services include Family Literacy Activities, Early Care and Education Career Pathways (ECE Career Pathway), and childcare. Parent centered initiatives offered through Generational Family Services can serve as a gateway to increased involvement in children's education and literacy activities and to careers centered on early care and education. The ECE Career Pathway, is designed to change the economic outlook for the family and is the culminating activity for family literacy participants and the initiative that can lead to economic self-sufficiency.

Family Literacy Activities

Family Literacy programs address the literacy strengths and needs of the family while promoting adults' involvement in children's education and their own education. Programs provide both parent-initiated and child-initiated activities to support development of those relationships and to increase the motivation to learn for both parent and child.

Family literacy programs provide services that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family and that integrate all of the following activities:

- Interactive Literacy Activities between parents and their children (Interactive Literacy)
- Education for Parents (Parent Education) in facilitating children's learning and becoming full partners in their education
- Parent literacy training (Adult Education) that leads to economic self-sufficiency and meets adults' stated goals
- Age-appropriate education (Early Care and Education) to prepare children for success in school and life experiences

English Language Acquisition

English Language Acquisition programs assist English language learners in:

- a) improving their:
 - i. reading, writing, speaking, and comprehension skills in English and
 - ii. mathematics skills; and
- b) acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.

An English language learner is an individual who has limited ability in reading, writing, speaking, or comprehending the English language. These individuals' native language is a language other than English and usually lives in a family or community environment where a language other than English is the dominant language.

Integrated English Literacy and Civics Education (IEL/CE)

IEL/CE instruction is a program or class which focuses on enabling English language learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. This includes instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, which may include workforce training.

Workforce Preparation Activities

The term workforce preparation activities means activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

Integrated Education and Training (IET)

The term 'Integrated Education and Training' means a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

(c) Corrections Education and other Education of Institutionalized Individuals. Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

Adult education and literacy activities;

Special education, as determined by the eligible agency;

Secondary school credit;

Integrated education and training;

Career pathways;

Concurrent enrollment;

Peer tutoring; and

Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Section 225(a) of the Act states "from funds made available under Section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education or education for other institutionalized individuals. The funds described in subsection (a) shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including programs for (1) adult education and literacy services, (2) special education, as determined by the eligible agency; (3) secondary school credit; and (4) integrated education and training; (5) career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

Corrections Education Program Requirements: In accordance with the WIOA Title II, Section 225(b), funds under this program are to be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for:

- 1. adult education and literacy activities;
- 2. special education, as determined by the eligible agency;
- 3. secondary school credit;
- 4. integrated education and training (IET);
- 5. career pathways;
- 6. concurrent enrollment;
- 7. peer tutoring; and
- 8. transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

The South Carolina Department of Education - Office of Adult Education reserves up to 20 percent of its federal grant received under the Act to provide the required services.

Corrections education sub-grantees must provide adult education and literacy, career pathways, and concurrent enrollment. Sub-grantees have the option of providing additional academic programs (items 2, 3, 7, and 8 above). If selecting to provide item 3, secondary school credit, the SCDE Office of Adult Education only permits high school equivalency diploma preparation.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The South Carolina Department of Education - OAE and each eligible agency that is using assistance provided under Section 225 of the Act to carry out a program for criminal offenders in a correctional institution, shall give priority to serving individuals who will be released within a period of five (5) years.

(d) Integrated English Literacy and Civics Education Program. Describe how the state will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries.

The Integrated English Literacy and Civics Education program are funded under WIOA Section 243 funds. Programs have been established in each of the 12 local workforce areas. These funds are utilized to assist students in improving their English language proficiency as well as offering opportunities for eligible individuals to prepare for and participate in postsecondary education or workforce training concurrently with adult education activities. The skills to be obtained assist students in obtaining citizenship, achieve basic life skills needed, enhance employment, function in English at a higher cognitive level, and transition into a vocational or academic program.

The South Carolina Office of Adult Education will be responsible for monitoring programs for compliance with WIOA Title II, Section 243 and providing technical assistance to programs participating in the IEL/CE program. Providers receiving funds under the IEL/CE program will be required to offer high quality English language acquisition activities, while integrating workforce preparation skills. These programs will also be required to implement an Integrated Education and Training (IET) program with eligible students. Programs will be required to identify eligible students, including professionals with degrees and credentials in their native countries, for participation in the IET program.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

- (e) State Leadership. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.
- Alignment of adult education and literacy activities with other one-stop required partners to implement the strategies in the Unified or Combined State Plan as described in section 223(1)(a).
- Establishment or operation of a high quality professional development programs as described in section 223(1) (b).
- Provision of technical assistance to funded eligible providers as described in section 223(1) (c).
- Monitoring and evaluation of the quality and improvement of adult education activities as described in section 223(1) (d).

The Integrated English Literacy and Civics Education program grant funds are distributed through a statewide competition and allocated based on a combination of formula and performance factors. Funds are used to provide services to English language learners who are adults, including professionals with degrees and credentials in their native countries, to enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Approximately 12 providers in South Carolina are awarded funds to be used to deliver English language acquisition activities integrated with workforce preparation activities. Programs receiving IEL/CE funds are required to partner with other entities to allow eligible students to participate in an IET, which combines adult education and literacy activities concurrently with workforce training or postsecondary education.

ALIGNMENT OF ADULT EDUCATION AND LITERACY ACTIVITIES

The South Carolina Department of Education's (SCDE) Office of Adult Education (OAE) has worked diligently and collaboratively to align adult education and literacy activities with core and required one-stop partners. During PY 2018, the OAE, along with core partners and other state agencies, will continue to make revisions to the Unified State Plan as requested by our federal program offices.

Strategic goals for the workforce development system in South Carolina, as indicated in the Unified State Plan, include the following:

- Strengthen the Workforce Pipeline
 - o Facilitation of middle skills and middle wage attainment;
 - o Creation of education and career pathways;
 - o Development of one, consistently delivered soft skills competency–based curricula;
 - o Enhancement of school–to–work transition and youth–focused programs; and
 - o Facilitation of Middle Skills and Middle Wage Attainment.
- Align the State's Current Public Workforce Development Resources to Ensure a Customer
 Centered Delivery System
 - o Coordinate Agency Business Engagement Activity;
 - o Build and Use Data Driven Decision Making and Evaluation Methods;
 - o Expand Specific Partnerships and Collaboration; and
 - o Coordinate business engagement activity.

The Office of Adult Education is intricately involved with state-level partners in achieving the strategic workforce goals. OAE staff is a part of various workgroups that have been formed to carry out the workforce goals. The workgroups consist of all core partners and other state level partners.

Core partners have worked together to identify ways to improve customer service amongst all workforce partner staff. A statewide plan for training frontline staff has been developed to ensure all partners in the SC Works Centers and workforce system have the knowledge and understanding of each program to guarantee all customers get the services they most need. The frontline staff training will facilitate tailored, effective and streamlined customer service. Core partners planned the training and pooled resources and talents for the most effective delivery methods. The web-based training went live in PY 2017 and will be a useful tool for educating and training current staff and will be helpful in onboarding new staff.

Core partners have also outlined a state-level vision for system integration along with an initial timeline. Activities that have occurred or are in process include the following: review of final rules regarding performance and reporting, review of current intake forms/applications, and identification of common elements and referral processes. Long range planning will include a review of system needs and project development in the context of final reporting guidelines and data collection instructions. Each core program is adapting and making changes to data collection and reporting systems to adhere to the final reporting requirements.

Although the WIOA Integration workgroup consisting of state and local level core and partner program representatives has been convened to plan for universal referral and intake, the integrated operating system will be the most difficult to achieve. Each agency already has a system procured and in place that works well for their programs. Adopting an entirely new system to be used by all partners may take many years to facilitate. Instead the group will likely continue to investigate systems that offer the flexibility to use individual systems but share common data elements and reporting through a portal. All options will require a lengthy process, but integration remains a top priority for the state.

The Office of Adult Education continues efforts to develop and be a part of partner efforts to establish career pathways as a means to provide access to employment and training services for individuals in adult education and literacy activities. The Office of Adult Education will continue to provide training to local adult education programs on career pathways. Local programs are monitored on the development of their career pathways, and as a part of the request for proposal/competitive grant award, they will be required to outline or describe their plan for developing a career pathway.

In addition to the aforementioned core partner activities, the Director of the Office of Adult Education serves as a member of the State Workforce Development Board. His participation on the state board further facilitates alignment of adult education and literacy activities with other one-stop required partners.

The Office of Adult Education collaborative effort with the South Carolina Vocational Rehabilitation (VR) Department, a core WIOA partner, continues to be one of our most successful collaborations. Adult education classes are provided at 24 Vocational Rehabilitation Offices around the state. VR clients referred to adult education are assessed with TABE to determine the focus of instruction. Clients who have a Mathematics scale score of 496 or above and a Reading scale score of 501 or above participate in three-week class sessions provided in preparation for the Career Readiness Certificate assessments. Remediation is provided for clients who do not meet class entry requirements.

Another successful partnership is with the South Carolina Department of Social Services (SCDSS). SCDSS administers the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E & T) initiative. SNAP recipients gain skills, training, work, or experience that will increase self-sufficiency. Adult Education has an agreement with DSS to offer adult education services to SNAP recipients to assist with meeting these goals. Emphasis will be placed on attainment of an HSD, HSED and a career readiness certificate.

HIGH QUALITY PROFESSIONAL DEVELOPMENT

The Office of Adult Education continues its efforts to establish and provide high quality professional development programs to improve the instruction provided pursuant to local activities required under Section 231(b), including instruction incorporating the essential components of reading instruction, instruction related to the specific needs of adult learners, dissemination of information about models and promising practices related to these programs, and teaching strategies to assist volunteers.

For several years, OAE has operated technical assistance centers. The Technical Assistance Network (TAN) training system supports our professional development process. The TAN system serves as an extension of the Office of Adult Education and supplements the services of OAE by providing professional development and technical assistance to help improve the quality and services of adult education programs. Local adult education staff are required and encouraged to participate in trainings offered by the state and in regional trainings offered through their local TAN. Local adult education practitioners are also encouraged to utilize existing professional development resources such as the Literacy Information and Communication System (LINCS) and WorkforceGPS.

Annually, statewide training opportunities are offered during the spring and fall for both paid and volunteer adult education practitioners. These training institutes are used as a platform to inform adult education practitioners of priorities and changes and to educate them on new practices and tools. Professional development has focused on WIOA, standards, career pathways, digital literacy, math and reading instruction, and other topics related to the specific needs of adult learners.

During the summer, graduate level courses are offered as an additional learning opportunity for all adult education practitioners at low to no cost. These professional development courses include training on best practices, instructional resources and WIOA requirements as they relate to adult education. As a result of the modifications, the following four graduate-level courses are offered:

- Fundamentals of Adult Education: Program Development, Design and Implementation
- Blending College and Career Standards with Technology to Expand Adult Education Instruction
- Digital Literacy in Adult Education
- Teaching English Literacy to Adult Learners
- Content Area Reading & Writing for Adult Educators (Satisfies legislative requirements for the Read to Succeed endorsement and Certificate Renewal)

Trainings, meetings, and webinars serve as avenues to share information on national and local models and promising practices. Training will continue for local adult education and literacy providers using the many resources available locally, state-wide, and nationally. OAE is working to place a stronger emphasis on ensuring that materials and training will incorporate research-based components.

Participants are surveyed after all workshops, conference presentations, and training webinars to evaluate the activity/event. Survey results are used for continuous improvement purposes and to identify what additional training may be needed. The survey results are also used to improve professional development offerings. In the future, OAE and the TANs plan to implement methods to assess the impact of professional development on student performance.

TECHNICAL ASSISTANCE TO FUNDED ELIGIBLE PROVIDERS

The OAE provides technical assistance to funded providers in many ways. Technical assistance was provided to individual providers or groups of providers either face-to-face, through conference calls, or web meetings. Statewide training sessions and regional meetings were conducted as well. With input from OAE, regional training was also conducted by TANs.

Overall program performance, as well as program performance through each initiative, is measured by the Desktop Monitoring Tool (DMT). Desktop monitoring allows both the state agency and local programs to understand how local programs are performing throughout the school year. Programs are required to submit this report quarterly. Programs that perform at aggregate averages of less than 65 percent for ABE and/or ESL students enter an ITAP (Intensive Technical Assistance Program) process and will remain in the process until program performance improves to levels equal to or above 65 percent for both ABE and ESL students.

Funds are being utilized for standards development. Led by OAE, a standards workgroup has been developed. The goal of the workgroup is to develop cross-walks between the state adopted standards, the OCTAE standards, GED and TASC standards, Accuplacer standards, and TABE standards. The program goal is for each provider to have at least one classroom that is totally standards-based and improve from that point to cover all academic classes.

MONITORING AND EVALUATION OF ADULT EDUCATION ACTIVITIES

To formally monitor providers, the Office of Adult Education assigns a compliance monitoring Local Program Review team (LPR) to review all school district programs and community-based organizations (CBO) receiving federal funds and/or state aid to support approved adult learning services.

The LPR process is a systemic approach designed to assess the educational opportunities and the effectiveness of adult education programs and services in the school districts and CBO's. One-fourth of the programs are reviewed each year by a team of OAE staff. The other three-fourths of the programs are informally reviewed by desktop monitoring tools and site visits. To be successful, the LPR effort requires continuous follow-up and support activities including professional development and on-site assistance.

Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

OAE has used funds for permissible activities to enhance the quality of programming in the adult education system. The permissible activities that were supported with federal leadership funds included:

- Technical Assistance Network (TAN) Funding is used to support the TAN. The TAN, in collaboration
 with the OAE, develops and provides training to adult education practitioners on various adult
 education-related practices and models that support program development and instruction.
 Professional development activities through the TAN focus on career pathways, integrated
 education and training, and more.
- Standards The OAE has been working to develop adult education standards that incorporate the state's K-12 standards and OCTAE standards.
- Distance Education The OAE purchases distance education packages for use by local adult education providers.
- Graduate Level Courses The OAE uses federal leadership funds to develop and execute graduate level college courses, based on WIOA guidelines, for adult education practitioners.
- Transition Services OAE guides implementation of transition services that are provided locally and provides training for the Transition Specialists.
- IET OAE has funded the development of a manufacturing career pathway and is currently developing a healthcare career pathway.

Generational Family Services have been incorporated into approximately 47 percent of South Carolina's adult education programs. Through partnerships adult education programs address one of the most prevalent and universal barriers for participation in adult education, "child care" and transportation.

Programs have incorporated family literacy services to enhance adult education program offerings, and address participation barriers while intensifying student academic goals, (high school diploma (HSD), high school equivalency diploma (HSED), career readiness certification, postsecondary education and training, entering/retaining employment, and focusing on career pathways). Participating students select an academic goal and parent education goal(s): (1) Increase involvement in children's education, and (2) Increase involvement in children's literacy activities.

GENERATIONAL FAMILY SERVICES (GFS) PROGRAM REQUIREMENTS

The purpose of the AEFLA GFS Program initiatives (Family Literacy and Early Care and Education Career Pathway) are to provide needed support for efforts that will increase student and family commitment in local adult education programs. The intent of GFS is to provide initiatives that interrupt generational poverty and low literacy by equipping adult students who are parents or guardians and their children for lifelong learning and economic stability. GFS will provide adult education students who are parents or guardians of children with opportunities to improve their academic skills and use those skills to enhance the literacy skills of their children.

GFS is an extension of services that may be offered by local adult education programs to remove barriers from an enrolled student who is a parent or guardian and increase their ability to participate fully in adult education programs. Programs may apply for the Adult Education sub-grant funds in order to provide GFS services. GFS program participation will support the interwoven goals of adult education and family literacy for adults to obtain a high school equivalency diploma (HSED), enter employment, retain employment, move into postsecondary education and training, choose a career pathway, and obtain the educational skills necessary to become full partners in the educational development of their children.

Programs *must* offer services that include the four components of family literacy. The activities must provide a broad array of services for the student to not only gain educational skills and earn a high school credential but also gain the skills to become the primary teacher for their children and prepare both the parent and the child for success in later life. The required four components of the GFS program are listed below.

- Adult Literacy (i.e., Adult Education (AE)) with the goal of obtaining a high school diploma, high school equivalent diploma, career readiness certificate, career pathway, postsecondary education, or the military.
- Training for Parents (i.e., Parent Education (PE)), guardians, or family members regarding how to be the primary teacher for their children and full partners in the education of their children.
- Educational Activities Between Parent and Child (i.e., Interactive Literacy Activities (ILA)) between parents or family members and their children. ILA must be supported by partnerships such as with the local school district, Head Start, Early Head Start, First Steps to School Readiness, Read to Succeed, and private partnerships.
- Early Childhood Services (i.e., Early Care and Education (ECE)) is an age-appropriate education to prepare children for success in school and life experiences. These services may be supported by partnerships such as the school district, Head Start, Early Head Start, First Steps to School Readiness, Read to Succeed, and private partnerships.

GFS Eligible Individuals: Participation in GFS Program initiatives is limited to adults and OSY, age sixteen (16) or older, who

- are enrolled in an adult education program; or
- are not enrolled or required to be enrolled in a secondary school under state law; or
- do not have a high school diploma or equivalent; and

- are basic skills deficient; or
- do not have a secondary school diploma or equivalent, and have not achieved an equivalent level of education; or
- are English language learners; and
- have a child(ren) ages birth (0) to eight (8) years, per South Carolina's requirement. This includes being a legal guardian, grandparent, stepparent, aunt, uncle, sibling, or other person with whom the child lives or who has been designated by a parent, legal guardian, or court to act in place of the parent.
- (f) Assessing Quality. Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Local eligible programs are accountable to the Office of Adult Education (OAE) to meet the standards of quality for administration and instruction as outlined by OAE. Effectiveness of programs, services and activities of local recipients of funds will be assessed through systematic evaluation of local programs. In addition, the performance outcomes of each local program will meet or exceed the established performance level for each core measure each fiscal year to ensure the highest quality service to adult learners who participate in programs. Program monitoring may include the following: formal on-site program reviews, and desktop monitoring reports.

OAE regularly conducts individual program monitoring. The purpose of this monitoring is to identify the specific areas in which a provider is in compliance or non-compliance with federal law and regulations, state statutes and rules. The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. A comprehensive and multi-dimensional Compliance Monitoring process is a foundation for continuous improvement of services and systems within each Adult Education program. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement and positive systemic change.

The OAE assigns a Local Program Review (LPR) Team to all school district programs and community-based organizations receiving federal funds and/or state aid to support approved adult education and literacy activities. All programs with a new Adult Education Director are required to go through the LPR process during their first year. All other programs are on a four-year rotating cycle.

The LPR process is a systemic approach designed to assess the educational opportunities and the effectiveness of the adult education programs and services by the providers. During a Local Program Review, team members review documentation requirements and processes in the following Workforce Innovation and Opportunity Act (WIOA) and State Considerations areas:

- 1. Commitment to Serve Individuals in Need
- 2. Serving Individuals with Disabilities
- 3. Past Effectiveness
- 4. One Stop System Alignment
- 5. Evidence Based Instructional Practices
- 6. Activities Implementation, Technology Use and Delivery Method
- 7. Contextualized Instruction
- 8. Instructor and Staff Qualifications
- 9. Partner Coordination for Development of Career Pathways
- 10. Support Services, and Service Flexibility

- 11. Performance Management Outcomes
- 12. English Language Acquisition and Civics Education
- 13. Corrections Education
- 14. Generational Family Services
- 15. Integrated English Literacy and Civics Education
- 16. Financial Monitoring
- 17. Student Records
- 18. Standardized Assessment
- 19. Program Management

To be successful, the Local Program Review requires continuous follow-up and support activities including professional development and on-site assistance. The on-site review process involves careful, systematic research and examination of the activities, practices, and systems. In order to form sound recommendations in each of these areas, the LPR Team should be provided with documentation that serves as evidence. The basis for the on-site review process is founded on three methods of obtaining evidence:

- Review of documentation
- Conducting interviews
- Observations

Upon completion of the Local Program Review, findings are shared with the Superintendent, Board Chair, and Program Director who is responsible for correcting any issues. The local program is required to respond to a formal written report, if there are any required actions.

OAE currently uses multiple factors to determine the risk level of each program. Risk factor categories include staff turnover, financial, family literacy, performance, and ESL. Programs are determined to be High, Medium, or Low Risk dependent on the cumulative point value of the identified factors. Program technical assistance and monitoring are based on an individual program's level of risk.

OAE has initiated efforts to improve the core follow-up measure "Enter Postsecondary Education or Training." The state staff is working closer with local program Directors to determine ways of improving the performance of this measure. OAE has also developed an agreement with SC Commission on Higher Education to data match with all public postsecondary institutions in South Carolina.

The process of data collection and analysis is reviewed at each LACES personnel quarterly meeting in the context of offering more in-depth information, re-clarification of previous information or introduction of new data information. As a result, local programs are using additional data for program improvement.

All programs receiving an Integrated English Literacy/Civics Education grant and/or Generational Family Services grant also complete a year-end Final Annual Report designed specifically for each grant.

Setting of Targets

OAE negotiates proposed target percentages for each of the core indicators of performance with the US Department of Education, Office of Career, Technical and Adult Education (OCTAE). Each local eligible program is responsible for meeting or exceeding the negotiated performance targets. Each program shall analyze progress towards meeting the targets on an ongoing basis. Each program must utilize the approved standardized assessments which provide the framework needed to measure program effectiveness.

Data Collection and Analysis

Local programs are required to collect data during Intake and Orientation on all incoming students. An analysis of the data on the program's performance is required of the program to determine if progress

towards meeting targets is occurring, and to identify areas of improvement. Analysis should include a review of academic, employment, secondary credential, and postsecondary measures. Local programs must assure that National Reporting System of Adult Education data quality standards are met.

Quarterly Desktop Monitoring Report

On a quarterly basis, local programs produce a data report that compares each program's outcomes to the negotiated performance targets and to the prior year's performance. Annually, deficient areas must be addressed through an action plan.

On-Site Program Review/Monitoring

The Local Program Review (LPR) process is a systemic approach designed to assess the educational opportunities and the effectiveness of adult education programs and services in the school districts and CBO's. One-fourth of the programs are reviewed each year by a team of OAE staff. The other three-fourths of the programs are informally reviewed by desktop monitoring tools and site visits. To be successful, the LPR effort requires continuous follow-up and support activities including professional development and on-site assistance. Financial Monitoring is included as a part of this process. Financial monitoring checks to determine if costs are reasonable and allowable.

Program Improvement

The Intensive Technical Assistance Program (ITAP) plan is designed with content to assist identified programs that are in need of intensive technical assistance to improve program performance. Training will take the form of off-site sessions, on-site sessions, and individual assistance. Sessions will be tailored to focus on specific strategies for developing systems to reorganize practices that will impact program administration, staff development, data collection and analysis, orientation and intake process, student exit and follow-up (specifically attendance), standardized assessment, student records, program records, and identified instructional areas. All sessions will focus on variables that directly and indirectly affect program performance. Local adult education programs that are identified as ITAP are given the designation as a result of the following three criteria:

- The aggregate average was less than 65 percent for the Adult Basic Education (ABE) educational functioning levels (EFLs) within the local adult education program
- The aggregate average was less than 65 percent for the English as a Second Language (ESL) EFLs within the local adult education program
- The average attendance hours for students within the local adult education program were on average thirty hours or less per student

Low performing programs enter a more intense type of technical assistance process that requires the following activities:

- Programs identified as in need of ITAP services for ABE or ESL attend training focused on Program Management as pertains to data, assessment, program design, instruction and retention.
- During the ITAP process, the OAE:
 - Participates in data analysis review with the local adult education director and teaching staff to identify problematic areas.
 - Conducts periodic visits to local programs to review classes, evaluate evidence of program management, and staff meetings, etc.
 - Assigns mentors that include directors and other program staff that can assist with program improvement.

• Assist local programs in developing "action plans" for immediate implementation.

Title III: Wagner-Peyser Act Program (Employment Services)

- (a) Employment Service Professional Staff Development.
 - (1) Describe how the state will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both job seekers and employers.

Professional Development Activities for Employment Service Staff

Staff development is an important component of South Carolina's commitment to deliver high quality and effective workforce services. Employment services staff are trained in job search techniques, accessing labor market information, workshop facilitation, interviewing skills, resume writing certification training, and addressing barriers to employment.

The staff also receives training to work with target populations, including "Building Bridges." Administered by the Bureau of Federal Prisons, this program helps individuals understand and develop skills to work with the ex-offender population. In-depth, on-going customer service training is mandatory for all SCDEW employees. Additionally, sales training is provided to Employment Service staff to help develop strategies for increasing business penetration.

Employment Services staff also have received training on effective case management, how to record effective case notes, developing individual employment plans, and recruitment best practices. An Employment Services manual was developed in order to compile policies and procedures. Routine trainings are provided to staff on contents of the manual and it is stored on the online system. Rapid Response training was developed and delivered to frontline staff who assist with rapid response services to businesses and jobseekers.

Wagner Peyser staff have attended the National Veterans Training Institute's Advanced Business Service and Advanced Case Management training. These offerings help further develop frontline staff's ability to assist the businesses and citizens of South Carolina. Onsite training and assessment are also provided in person to local staff and management. Regional Managers participate on LWDBs to provide information and are involved in workforce issues on the state and local level.

(2) Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.

Strategies to Support Training and Awareness across Core Programs

SCDEW shares information and provides technical assistance to staff who serve job seekers and employers. Technical assistance on Unemployment Insurance (UI) issues, questions regarding eligibility, and on the work search test are also provided to SC Works Center staff. Additionally, SCDEW's website supplies answers to frequently asked questions regarding UI. UI claimants receive information and assistance on the full range of one-stop services offered both online and in person. Rapid Response teams provide services to employers and workers in layoff situations and conduct claim filing activities when needed.

UI programs play a vital role in the integrated workforce system by providing income support benefits to eligible individuals who continue to be important customers of the workforce system. These benefits allow unemployed workers to engage in work search activities for suitable employment, and the workforce system is a key source of services to support the reemployment of UI claimants.

To ensure efficiency, a Workforce Information Portal (WIP) was developed to provide a secure method for partner staff to obtain the necessary UI data that is used to determine an individual's potential eligibility

for services and training under WIOA. The WIP also allows staff to communicate potential UI fraud and availability issues in an efficient and streamlined manner. Sharing such information with UI staff helps to accelerate the claimants' return to suitable employment and ensure their continued eligibility to receive UI benefits.

(b) Explain how the state will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service.

Provision of Information and Meaningful Assistance

Access to the online claim filing system is available at every SC Works location across the state. Resource rooms are staffed with individuals who can assist with filing a claim. A toll-free number is also available for individuals with questions specific to their claims. A network of access points has been established statewide for individuals to apply for benefits and perform their work search. Registration in the SC Works Online System (SCWOS) is required for all UI Claimants and two required weekly work searches must be conducted within the system. Access to SCWOS is available at all comprehensive centers and access points. Claim filing guides are available in resource rooms at SC Works locations and employment service staff is available to assist and answer question about the filing process. An Unemployment Insurance 101 training was developed and delivered to SC Works Center staff. The training was also uploaded and stored on the Agency's learning management system and is available for all staff.

(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

Strategy for Providing Reemployment Assistance to UI Claimants

Universal Access

Individuals seeking employment and eligible to work in the United States are eligible for Wagner-Peyser services. These services can be provided in person or remotely. Job search assistance, access to labor market information, résumé assistance, workshops, and hiring events are offered in all comprehensive centers.

To identify individuals who are at risk of exhausting benefits, South Carolina requires all UI claimants to register for Employment Services in SCWOS. Individuals attending Worker Profiling and the Re-employment Services and Eligibility Assessment Program (RESEA) are first given information on services provided by the workforce system, and after an initial assessment they are provided with more customized services for their situation. These services could include referrals to employment, referral to partners, participation in workshops, and information on the local labor market, training options, and other services that are available.

Re-Employment Services and Eligibility Assessment Program (RESEA)

The Re-employment Services and Eligibility Assessment Program (RESEA) is designed to address individual reemployment needs of UI claimants and works to prevent and detect UI improper payments. RESEA serves as a bridge between Unemployment Insurance and Employment Services in the provision of services to ex-Military members (UCX) and lack of work claimants, with the goal of reducing duration and protecting the integrity of the UI Trust Fund. Numerous services are provided through the program to include but not limited to reemployment services, provision of labor market information, one stop orientations, development of employability plans, referrals to training and unemployment compensation eligibility reviews. The RESEA program is operated from all comprehensive SC Works Centers, in coordination with SCDEW's Unemployment Insurance Division.

- (d) Describe how the state will use Wagner-Peyser funds to support UI claimants, and the communication between Wagner-Peyser and UI, as appropriate including the following:
 - (1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

Coordination of and Provision of Labor Exchange Services

All individuals applying for UI benefits are required to register with the state Employment Service by creating an account in SCWOS. This allows individuals to search for jobs, job referrals, create a resume, set up job matching criteria, develop an employment plan, take self-assessments and search labor market information. SC Works Centers have resource rooms that support these services, and staff is available to assist. As a result of aligning services, individuals with barriers to employment are provided staff assisted services. Additionally, referrals to partner and community service providers are available along with information on Federal Bonding.

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

Registration of UI Claimants

As stated previously, South Carolina law requires UI claimants to register in SCWOS and perform two work searches per week using the system. Wagner-Peyser staff is available to assist individuals with the registration process and the weekly work search if assistance is needed. Workshops on various reemployment topics are also offered at SC Works centers, and anyone interested is able to attend.

(3) Administration of the work test for the state unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

Administration of Work Test for State Unemployment Compensation System

In order to receive and maintain benefits in South Carolina, individuals must register in the SC Works Online System (SCWOS). Individuals must also be able, available, and actively seeking work. Claimants are required to perform two work searches per week in SCWOS. If an individual fails to perform a search or declines a request for an interview with a prospective employer, an issue can be placed on the claim for further clarification.

Job finding and placement services are offered both remotely and in person. To facilitate these services, each comprehensive SC Works location has staff available to assist individuals looking for employment. Employment Services staff post available positions for employers and help individuals match their skills with available positions for which they qualify, including UI claimants. SCWOS also spiders in jobs posted on many other job boards and individual company websites.

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

Referrals and Application Assistance for Training and Education Programs

Staff in SC Works centers across the state use an initial assessment to determine customers' needs. Based on information received during this process, coupled with an individual's stated goals, a path forward is identified for each customer. This path could include information or workshops offered in centers or at partner locations, or referrals to training programs and other partner or community-based services. In addition, staff may assist customers with training or financial aid applications as needed. Coordination and communication among partners is critical to the success of each individual in order to provide an array of options that will benefit the customer most.

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- (e) Agricultural Outreach Plan (AOP). Each state agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include—
 - (1) <u>Assessment of Need</u>. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the state. Such needs may include but are not limited to: employment, training, and housing.
 - (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.
 - (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.

Agricultural Outreach Plan

Assessment of Need

There are several factors that make the needs of the South Carolina's farm worker unique. Although the agricultural industry is a long-established tradition in South Carolina, its workforce has seen dramatic changes in recent years There continues to be an increase in H-2A workers and this trend is expected to continue.

South Carolina's Migrant and Seasonal Farmworkers (MSFWs) are predominantly from Latin-American countries — having Mexico as the main contributor of workers, but also including individuals from Central America and the Caribbean. Most of them speak Spanish, but we have also detected several indigenous dialects from the south of Mexico and regions of Central America.

Since most of the MSFWs are Latino, one important aspect when analyzing the needs of the farmworker is to consider the Latino community in the state as a whole. The Latino community in South Carolina is growing rapidly. However, this community is still considered an "emergent" community. As a result, this

community lacks the resource network that would be easily found in states with a large and well established Latino community such as California, Texas or Florida — or even North Carolina. In those states, farm workers utilize resource networks, usually comprised of Latino community-based and religious-based organizations, to learn about the workforce system and how they can access workforce development services. In our state, this resource network is new and small. Furthermore, sometimes when farmworkers are able to navigate the system, they find that agencies or organizations providing the services lack bilingual/bicultural staff to understand their language and overcome cultural differences. As a result, we have a community that is at risk of being isolated and unable to access available resources.

In the SC Works Centers throughout the state, bilingual staff members work with MSFWs of limited English proficiency to provide career services. When no qualified and trained bilingual employee is available, SCDEW will offer and secure, at no cost to the client, a qualified interpreter or translator service. If there is a need for remedial and/or occupational training, the MSFW is generally referred to a local Adult Education office for English as a Second Language and is then referred to a training provider.

Telamon is also a partner of the SC Works Centers and provides additional services to migrant and seasonal farmworkers. In the coming program year, efforts will be made to establish closer cooperation and service collaboration with partners, such the state's NFJP grantee, to ensure greater alignment of career and training services to MSFWs.

In Program Year (PY) 2019, the number of H–2A workers is expected to continue to increase. Overall, the projected agricultural workforce need for South Carolina in PY 2019 is approximately 12,750 workers. This is a small increase in the number of workers that was needed in PY 2018. April through September are the peak harvest months in South Carolina. It is anticipated that the number of agricultural job openings received by DEW will remain steady at about 11,000. This total includes approximately 6,300 migrant and seasonal farm workers and 6,270 H–2A. The number of domestic MSFWs in South Carolina is difficult to estimate and could be understated as some of these workers cannot be located.

TABLE 1: ESTIMATED NUMBER OF MSFW AND H-2A WORKERS

Estimated Number of MSFW and H-2A Workers PY 2019				
Area	Estimated MSFWs	Estimated H-2As		
Beaufort	1125	1734		
Charleston	1150	340		
Greenwood	1050	3147		
Spartanburg	1200	494		
Sumter	1800	555		
TOTAL	6325	6270		

The peach and strawberry industries continue to increase the size of the H–2A worker program. Other specialty crops, as well as nursery and greenhouse work, have also contributed to this increase. These activities are primarily in the Savannah Ridge and Piedmont areas.

TABLE 2: SOUTH CAROLINA TOP 10 COMMODITIES

South Carolina					
Top 10 Commodities					
Commodity	State receipts (\$1,000)	Percent of State receipts	U.S. receipts (\$1,000)	Percent of U.S. receipts by commodity	
Broilers	1,028,768	40.2	1,028,768	3.2	
Miscellaneous crops	333,065	13.0	333,065	1.6	
Corn	192,864	7.5	192,864	0.4	
Cotton lint, Upland	163,020	6.4	163,020	2.4	
Cattle and calves	127,993	5.0	127,993	0.2	
Chicken eggs	120,549	4.7	120,549	1.1	
Soybeans	109,474	4.3	109,474	0.3	
Peanuts	89,216	3.5	89,216	5.9	
Peaches	72,855	2.8	72,855	14.0	
All other animals and products	51,853	2.0	51,853	0.9	

- (f) <u>Outreach Activities</u>. The local offices outreach activities must be designed to meet the needs of MSFWs in the state and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the state agency's proposed strategies for:
 - (1) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

MSFW Outreach Activities

SCDEW staff conduct outreach activities with agricultural workers through five significant offices: Beaufort, Charleston, Greenwood, Spartanburg, and Sumter. These are located in SC Works Centers. Other public and private community service agencies and migrant and seasonal farmworker groups also provide outreach services. Outreach efforts occur in traditional community settings such as housing facilities, faith-based organizations, health departments and restaurants, community centers, or other areas where MSFWs may congregate.

The farmworkers are contacted at their living, gathering or other assembly areas by outreach workers. An explanation of workforce services available to MSFWs, their rights, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services is provided in their native language. MSFW outreach workers are required to be bilingual and provide language appropriate services as needed. MSFWs are also provided information about other area organizations available to serve them.

The MSFW Program will continue to establish working relationships with local, regional and statewide agencies to disseminate information regarding the job services provided to MSFWs. Outreach workers are also encouraged to continuously propose new ideas for effective outreach. Resource and information sharing are essential to reach this goal. MSFW outreach workers are experts in their own regions and are

aware of the "best practices" to reach MSFWs who are not being reached by normal intake activities. Quarterly MSFW outreach worker training/meetings provide a standardized framework for continued success and are attended by the State Monitor Advocate.

(2) 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 (Employment-Related Law Complaint System ("Complaint System" described in 20 CFR 658 Subpart E)), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Technical Assistance to Outreach Workers

Outreach workers participate in the following training sessions:

- SCWOS 101 Training and SCWOS Business Services Training
- MSFW Training- Roles and Responsibilities
- MSFW Complaint Process Training

The State Monitor Advocate (SMA) assists in providing quarterly training for all outreach workers. This quarterly training includes topics inherent to the MSFW program such as: Federal Guidelines and Regulations, Federal LEARS Reporting, Migrant Immigration of Compliance Reports, Outreach Worker Roles and Responsibilities, MSFW Effective Outreach, and Best Practices. The quarterly trainings include information about SCDEW's job service activities and other workforce development programs. This includes local and regional workforce development and supportive services programs, such as: Migrant Health Services, Migrant Education Program, and other community-based programs. These Quarterly Outreach Worker training/meetings also provide an opportunity for Outreach Workers to better understand the challenges and opportunities that may arise when serving MSFWs.

The SMA works with Employment Services Managers to develop the training agendas. One goal of quarterly training is to ensure that all outreach workers are equally proficient in their position.

(3) Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues

Outreach Worker Training and Awareness across Core Programs

Outreach Workers are trained on programs along with specialty trainings designed to help them in their specific jobs. Training will be provided in the areas of resume development, customer service, and sales.. Unemployment Insurance training was developed and delivered to all Employment Services staff, to include MSFW Outreach workers, and it is stored on the agency's learning management system. It is available to all staff and new hires. Outreach staff also participate in trainings offered to all SC Works center frontline staff. Professional development opportunities are available for state merit outreach staff such as resume writing certification, career development facilitator certification and other training options.

(4) Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

Professional Development for State Merit Staff Outreach Workers

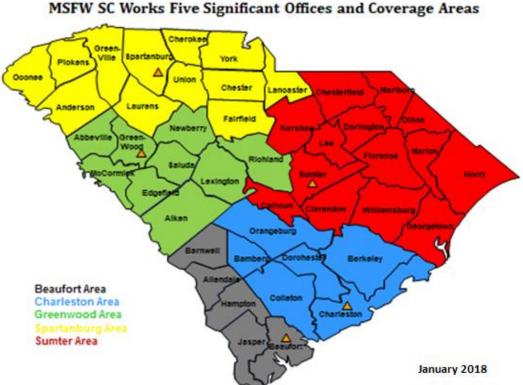
Professional development opportunities are available for state merit outreach staff such as resume writing certification, career development facilitator certification and other training options.

- (5) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups. If an NFJP grantee is the State Workforce Agency's (SWA) subrecipient conducting outreach, provide:
 - i. A description of that relationship;
 - ii. A description of any other MSFW service providers the NFJP is coordinating with; and,
 - iii. The NFJP grantee's outreach plan to be included in the State Plan.

Coordinating Outreach with NFJP Grantees

Coordination with NFJP grantees will take place with outreach workers across the state to provide services. SCDEW outreach staff will coordinate visits with Telamon to locations across the state. The coordination of outreach efforts with the NFJP grantees includes agency field staff working in conjunction with the NFJP regional field representatives in the designated regions.

FIGURE 1: MSFW SC WORKS FIVE SIGNIFICANT OFFICES AND COVERAGE AREAS



Vigorous outreach activities will be conducted to ensure that MSFWs are aware of the full range of employment services. SCDEW outreach workers and Rural Manpower staff will work together to coordinate outreach activities, thus maximizing program effectiveness and efficiency. Statewide, there are five, fulltime outreach worker positions dedicated to outreach activities in the Beaufort, Charleston, Greenwood, Spartanburg, and Sumter outreach areas. MSFW outreach staff, as well as Rural Manpower staff, will be primarily supported through Wagner-Peyser funding. Due to the varying concentrations of MSFWs in the different areas, some movement of outreach workers between areas will be necessary.

SCDEW partners with other agencies across the state of South Carolina that also target the MSFW population, including the WIOA Section 443 National Farmworker Jobs Program (NFJP) Grantee-Telamon Corporation, SC Legal Services, SC Department of Education Migrant Education Program, SCPHCA-Migrant Health Program, East Coast Migrant Head Start Program, and faith-based migrant community organizations and associations.

In addition, staff will continue to foster cooperation with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues. For example, the State Monitor Advocate (SMA) actively participates in different coalitions and groups across the state to advocate for the MSFW community and forge collaborative partnerships. These groups include the Greenville Hispanic Alliance, Alianza Hispana de Columbia, Spartanburg Hispanic Alliance, Lowcountry Immigration Coalition, Council of Mexicans in the Carolinas and the SC Hispanic Leadership Council, among others. The SMA also maintains contact with community and faith-based organizations, as well as media outlets, healthcare providers, government agencies, and Department of Education representatives.

The SMA acted as a Member of the Advisory Council of the Institute of Mexicans Abroad. This institute is part of the Secretary of Foreign Affairs of Mexico. As part of this group, the SMA worked closely with the Mexican Consulate in Raleigh, N.C. which is entrusted with providing services to people of Mexican origin in the states of South Carolina and North Carolina. The SMA's strategic goal is to develop a statewide effort to enhance the quality of life and quantity of services delivered to the MSFW community in South Carolina through the sharing of useful information and timely exchange of ideas.

Additionally, SCDEW conducts annual farmer meetings regionally to allow organizations that work with the MSFW population an opportunity to inform farmers of the many services and benefits available to their workers.

SCDEW will comply with CFR 20 653.107, Sub-part B, in delivering services to MSFWs. The roles and responsibilities of the outreach worker include:

- Contact and locate the MSFWs where they work, live or gather
- Observe the work and living conditions
- Explain the services available and other organizations serving MSFWs
- Provide information about the job service complaint system and assist in the preparation of a worker complaint
- Explain basic farm worker rights when the outreach worker refers an MSFW to a job (20 CFR 653 and 658)
- Refer to job openings and assist in the preparation of a work application
- Refer to supportive services, if needed
- Assist in making appointments, preparation of applications for employment services, and arranging transportation to and from local workforce centers
- Maintain complete records of contacts with MSFWs and services performed

An explanation of workforce services available to MSFWs, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services will be provided in a language readily understood by the farmworker. MSFW outreach workers are required to be bilingual and provide language appropriate services as needed. MSFWs will also be provided with information about other area organizations available to serve them.

Each outreach worker will maintain a log of daily contacts which will include the number of MSFWs contacted and details of the assistance provided. The name of the individual contacted will be recorded in all cases where an application for work is taken, a referral to a job is made, and/or a complaint is filed.

Detailed reports relative to the number of MSFWs, their office of registration, and services provided can be retrieved through the reporting module in SC Works Online Services (SCWOS), the data management, service delivery system for WIOA, Wagner-Peyser, and Trade Adjustment Assistance. The "Notice to Job Seekers" which lists the services available through the SC Works Centers and the toll-free farmworker helpline flyers will be distributed to all MSFWs contacted.

Outreach workers will be familiar with working and living conditions of the migrant and seasonal farm workers. If they observe, have reason to believe, or are in receipt of information regarding a suspected violation of employment related laws or employment service regulations by an employer, the outreach worker shall document the suspected violation and provide the information to the SC Works Center Employment Services Management staff. They will provide assistance in the preparation of job service and non-job service complaints. Complaints will be recorded using the Employment Services Complaint Log and resolved using the Employment Services Complaint System.

- (g) <u>Services provided to farmworkers and agricultural employers through the one-stop delivery system.</u>

 Describe the state agency's proposed strategies for:
 - (A) Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes.
 - (i) How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;
 - (ii) How the state serves agricultural employers and how it intends to improve such services.

Services Provided to Farmworkers and Agricultural Employers

SCDEW's outreach program will focus on increasing MSFWs' ability to access career and training services through SC Works Centers. Outreach workers will inform MSFWs of and refer them to verified employment opportunities and the Employment Services Complaint System. Outreach workers will encourage the MSFWs to utilize the SC Works Centers to obtain the full range of career services; however, on-site assistance will also be offered in the preparation of ES or employment related law complaints, obtaining referrals for employment opportunities, and preparation of employment applications.

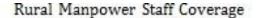
Outreach workers will refer individual MSFWs, or family members, who may be eligible, to WIOA and supportive services and, as needed, will provide assistance in making appointments MSFWs also will be shown how to use SC Works Online Services (SCWOS), an Internet-based workforce data management and service delivery system. Through SCWOS, MSFWs can establish a Wagner-Peyser application and apply for jobs.

In the SC Works Centers throughout the state, bilingual staff members work with MSFWs of limited English proficiency to provide career services. When no qualified and trained bilingual employee is available, SCDEW will offer and secure, at no cost to the client, a qualified interpreter or translator service. If there is a need for remedial and/or occupational training, the limited English proficiency MSFW is generally referred to a local Adult Education office, first, for an "English as a Second Language" course, then is referred to a training provider. Telamon is also a partner of the SC Works Centers and provides additional services to migrants and seasonal farm workers. In the coming program year, efforts will be initiated to establish closer cooperation and service collaboration with partners to ensure greater alignment of services to MSFWs.

Extensive outreach to agricultural employers is an on-going process. This is critical to maintaining interpersonal contact with the employers. Employers are contacted by Rural Manpower coordinators

operating out of three SC Works Centers strategically located throughout the state. The map below reflects the statewide coverage provided by Rural Manpower staff through a lead coordinator and support staff.

FIGURE 2: RURAL MANPOWER STAFF COVERAGE





Examples of services provided to agricultural employers by SCDEW staff include:

- Local, regional and national recruitment assistance
- Screening job applicants
- Provision of information such as crop conditions, labor supply, and labor market information
- Connection and coordination of services with government and community agencies
- Technical assistance with foreign labor certification
- Soliciting and filling job orders
- Disseminating information on farm-related rules and regulations
- Registering of farm labor contractors
- Providing consultant inspections of migrant housing
- Offering assistance to farmers in obtaining supplies for migrants
- Referring complaints to proper enforcement agencies
- Assisting employers in obtaining work-related posters and notices
- Participating in agricultural related meetings and notifying farmers of these meetings

Many contacts with agricultural employers are made as a result of referrals from other agencies such as the SC Department of Agriculture and Clemson University as well as by word-of-mouth from other workers or farmers.

SCDEW periodically hosts grower meetings to inform agricultural employers of services available through the state workforce system. Intensive efforts will be made in the upcoming year to increase the market penetration of agricultural employers.

The most basic service provided to agricultural employers is the filling of job openings. Job orders from agricultural employers are entered in SCWOS and qualified candidates are referred. All H-2A order users are mandated to take all qualified United States referrals through the workforce system. Rural Manpower, in particular, strives to refer local applicants to all H-2A orders through community contacts and referrals. In addition, training has been provided to SC Works Center staff throughout the state to encourage local domestic US workers to apply for H-2A jobs.

Other services include the certification and renewals of certification for farm labor contractors and housing inspections of both H-2A and MSFW camps. The Rural Manpower coordinators also perform field checks and communicate with the Chicago National Processing Center in addressing matters relative to any H-2A deficiencies. They also provide critical coordination services by moving MSFW crews to the growers at the appropriate times.

The Employment Services staff will strive to meet and exceed federal program requirements with respect to equity and minimum service level indicators of compliance.

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

SCDEW will market the complaint system to farmer workers utilizing field staff along with a poster explaining the complaint system for posting onsite.

(3) Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

Services available to farmers and farmworkers are available online at jobs.scworks.org. Information will be shared with farmers and farmworkers and it is also included online at www.dew.sc.gov.

(h) Other Requirements.

(1) Collaboration. Describe any collaborative agreements the SWA has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Collaborative Agreements with MSFW Service Providers

SCDEW partners with several agencies across the state that also serve the MSFW population. Such organizations include the National Farmworker Jobs Program (NFJP) grantee - Telamon Corporation, South Carolina Legal Services, South Carolina Department of Education Migrant Education Program, South Carolina Primary Health Care Association-Migrant Health Program, East Coast Migrant Head Start Program, and faith-based migrant community organizations and associations.

In addition, staff continues to foster collaborative partnerships with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other outreach efforts. For example, SCDEW conducts annual farmer meetings regionally to allow organizations that work with the MSFW population an opportunity to inform farmers of the many services and benefits available to farmworkers. In addition, Outreach Workers are encouraged to

participate in local boards/meetings and become part of efforts to increase the quantity and quality of services delivered to the MSFW community. The SMA monitors and evaluates the Outreach Workers' collaborative efforts and their participation in local board/groups that are inherent stakeholders of the MSFW community.

The MSFW Program has become part of the organizing committee for the South Carolina Farm Worker Institute. This institute is a networking and learning opportunity for agencies, organizations, and community leaders working with farm workers across the state.

The State Monitor Advocate has established an ongoing effort to foster shared communications and promote a statewide collaboration to enhance quantity of services delivered to the MSFW community through the sharing of useful information and timely exchange of ideas.

- (2) Review and Public Comment. In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.
 - (i) The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

Review and Public Comment

Telamon, the SC Agricultural Worker Health Program, and the SC Department of Education Migrant Education Program were emailed a draft of the AOP on January 31, 2020 for review and comment.

(3) Data Assessment. Review the previous four years Wagner-Peyser data reports on performance. Note whether the state has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non- MSFWs. If it has not met these goals, explain why the state believes such goals were not met and how the state intends to improve its provision of services in order to meet such goals.

Data Assessment

Statewide assessments have shown an opportunity to increase services directly provided to migrants. The State has had success in referrals to employment, referrals to supportive services, job development, referral to staff assisted services, and job placement. For the four preceding program years, the State met all of its Equity Ratio Indicators except two in PY 2015: Job Development Contact and Career Guidance. However, the state has met all of its Minimum Service Level Indicators in PYs 2016, 2017, and 2018. Collaborative efforts to provide services to MSFWs as well as improve the tracking system for services provided will continue. SCDEW is establishing activities to increase the number of MSFWs registered in SCWOS and focusing our efforts on increasing the number of services delivered to MSFW. We are working

with local employers and workforce development initiatives to capture current and reliable information regarding all placements of MSFW.

(4) Assessment of progress. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the state believes the goals were not achieved, and how the state intends to remedy the gaps of achievement in the coming year.

Assessment of Progress

Staff has continued to build working relationships in their region with entities to help serve migrant workers. All outreach staff are now bilingual and have more access to the farm community. The state plans to continue to look for effective ways to serve the migrant and farm communities. The state met all performance indicators for PYs 2016-2018.

(5) State Monitor Advocate. The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

SMA has reviewed the AOP and awaiting public comments before final approval.

VOCATIONAL REHABILITATION – SCVRD

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

- (a) Input of State Rehabilitation Council. All agencies, except for those that are independent consumer-controlled commissions, must describe the following:
 - (1) input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;
 - (2) the designated state unit's response to the Council's input and recommendations; and
 - (3) the designated state unit's explanations for rejecting any of the Council's input or recommendations.

SCVRD is an independent commission.

- (b) Request for Waiver of Statewideness. When requesting a waiver of the statewideness requirement, the designated state unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:
 - (1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;
 - (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.

SCVRD has not requested a waiver of statewideness.

- (c) <u>Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System</u>. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:
 - (1) Federal, State, and local agencies and programs;
 - (2) State programs carried out under section 4 of the Assistive Technology Act of 1998;
 - (3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;
 - (4) Non-educational agencies serving out-of-school youth; and
 - (5) State use contracting programs.
- 1. In carrying out its mission to prepare and assist eligible individuals to achieve and maintain competitive employment, the South Carolina Vocational Rehabilitation Department (SCVRD) actively seeks referrals and comparable services and benefits. In doing so, the department has established formal and informal partnerships with other providers of facilities and services. For the purpose of referral, service collaboration, facility allocation, and staff designation, cooperative agreements have been established with

the following agencies in South Carolina: Department of Mental Health (DMH), the Department of Corrections, the Department of Juvenile Justice (DJJ), the Department of Disabilities and Special Needs (DDSN), the Department of Health and Human Services (DHHS), and the South Carolina Department of Education (SCDE). Detailed agreements between SCVRD and the SCDE describe the coordination of schoolto-work transition services and also Adult Education services. With regard to the SC Independent Living Council, the department acts in an advisory and technical support capacity. The SCVRD portion of the Combined State Plan assures that an interagency agreement or similar document for interagency coordination between any appropriate public entities becomes operative. The department has entered into collaborative arrangements with institutions of higher education as well. This is to ensure the provision of vocational rehabilitation services, described in Title IV of WIOA, are included in the Individualized Plan for Employment (IPE) of an eligible individual. This includes the provision of vocational rehabilitation services during pending disputes as described in the interagency agreement or similar document. SCVRD will seek to assure the participation of individuals with physical and mental impairments in training and employment opportunities, as appropriate. With the exception of services specified in paragraph (E) and in paragraphs (1) through (4) and (14) of section 103(a) of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA) enacted on July 22, 2014, information shall specify policies and procedures for public entities to identify and determine interagency coordination responsibilities of each public entity in order to promote coordination and timely delivery of vocational rehabilitation services.

- 2. SCVRD works closely with the SC Assistive Technology Program (SCATP) through ongoing communication, cross-participation in staff trainings, and participation in the annual AT Expo. Staff with the SCATP also participates in the Transition Alliance of South Carolina (TASC).
- 3. SCVRD will provide input to the US Department of Agriculture Office of Rural Development as it endeavors to support the development activities that empower and build capacity of local communities.
- 4. SCVRD partners with multiple agencies and entities serving out-of-school youth, to include DJJ (Job Readiness Training and teen centers), Centers for Independent Living, University of South Carolina Center for Disability Resources, SC Developmental Disabilities Council, and Family Connection of SC.
- 5. No State Use Contracting Program is in place in South Carolina.
- (d) Coordination with Education Officials. Describe:
 - (1) The designated state unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.
 - (2) Information on the formal interagency agreement with the state educational agency with respect to:
 - (A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;
 - (B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;
 - (C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

- (D) procedures for outreach to and identification of students with disabilities who need transition services.
- 1. SCVRD considers service provision to high school students with disabilities a priority and collaborates with local and state education agencies to serve them. SCVRD serves students with disabilities who have various pre-employment transition needs in their efforts to prepare for, find, and maintain competitive, integrated employment. SCVRD provides individualized services to students pursuing a high school diploma, a SC High School Credential or Certificate of Attendance to help students successfully enter competitive, integrated employment. This includes making available Pre-Employment Transition Services to all students who are eligible and potentially eligible for VR services.

The State Board of Education statute, 43-243, requires the mandatory participation of representatives of state agencies involved in the financing or delivery of related services to children with disabilities in the state's Advisory Council for Educating Students with Disabilities. The Advisory Council's purpose is to provide recommendations and input on special education and related services for students with disabilities to the Office of Special Education Services.

2. SCVRD and the SCDE are signatories and partners in a Memorandum of Agreement (MOA). This agreement expresses a basic commitment on behalf of both agencies to provide comprehensive vocational and educational services to individuals with disabilities. The agreement details each entity's roles and responsibilities, including financial responsibilities, in identifying and serving students with disabilities. Items covered in the agreement include: student identification and exchange of information, procedures for outreach to students with disabilities who need transition services, methods for dispute resolution, consultation and technical assistance to assist educational agencies in planning for school-to-work transition activities, and the requirements for regular monitoring of the agreement. Timing of student referrals is individualized based on need but should generally occur no later than the second semester of the year prior to the student's exit from school.

Using the SCVRD-SCDE MOA as a model, SCVRD has developed agreements with all local education agencies in the state. These MOAs clarify roles and responsibilities at the local level. There is an SCVRD counselor assigned to each of the high schools in the state, whose purpose is to provide Pre-Employment Transition Services, be a resource for coordination activities to ensure provision of Pre-Employment Transition Services, participate in school-based meetings as appropriate, and to seek referrals of students who can benefit from SCVRD services. SCVRD also maintains an agreement with the South Carolina School for the Deaf and the Blind.

Provision of Pre-Employment Transition Services is a cornerstone of the agreements with local education agencies/school districts in terms of SCVRD's role. SCVRD provides a robust set of student and youth services to enhance the transition from school to work or postsecondary training opportunities. As indicated in WIOA, SCVRD transition counselors provide Pre-Employment Transition Services for students prior to their exit from high school, and SCVRD staff continue to provide services to support placement into competitive, integrated employment, or completion of postsecondary training and/or credential-based programs.

SCVRD utilizes the five required Pre-ETS activities as a framework for school-to-work transition services. This includes regular activities that focus on job exploration counseling, work-based learning experience, counseling on opportunities for comprehensive transition or postsecondary educational programs, workplace readiness training to develop social skills and independent living skills, and instruction in self-advocacy. Group activities provide opportunities to not only facilitate peer mentoring, but also allow transition staff to observe and cultivate students' leadership skills, as well as communication and social skills. VR has expanded the outreach of Pre-ETS through the awarding of a multi-year grant to the three

Independent living centers and the National Federation of the Blind to provide activities in Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self-Advocacy.

SCVRD maintains a priority on providing work-based learning experiences for students. In keeping with evidence-based practices that support work experience to be one of the most influential factors in successful postsecondary employment outcomes, transition staff actively pursue a variety of paid and unpaid work based learning opportunities, to include job tryout, job shadowing, internship, and apprenticeship opportunities for students. This impacts not only the ultimate outcome of competitive, integrated employment but has been shown to be an integral support for school completion and drop-out prevention.

In collaboration with the SC Department of Employment and Workforce (SCDEW) and the SCDE, SCVRD's school-based transition counselors work together with local education agencies, community partners, workforce development boards, SC Works Centers and business partners to advise students with disabilities, and their families, regarding available career pathways and educational/training opportunities.

SCVRD maintains a Transition Services Coordinator position and additional Transition Specialist positions whose duties focus on the authorized activities required for effective provision of Pre-Employment Transition Services. These include:

- Coordinate all transition-related activities and projects, including those that involve other agencies, community organizations and local SCVRD field offices;
- Develop, monitor and update all transition documents and cooperative agreements;
- Provide technical assistance, professional development and training on transition-related issues to field office staff, education personnel, community organizations, families, and students;
- Review and update consumer service policy to ensure policies and procedures are reflective of SCVRD mission and focus on quality in serving youth in transition;
- Participate in TASC, an interagency initiative to create systems change and support development of local interagency transition teams.

SCVRD continues to facilitate the development of innovative transition services to improve the successful outcomes of students and transition-aged youth. In this effort, SCVRD has integrated evidence-based practices for successful transition into the service delivery system. SCVRD also offers several additional programs to enhance transition services:

- Transition Services Specialist (TSS) a cooperative funding initiative that enhances the general transition services offered to a school by engaging a school employee designated as the Transition Services Specialist. The TSS coordinates with the assigned SCVRD counselor, to provide Pre-Employment Transition Services. Work-based learning experiences are a critical component of the initiative. The intent of this program is to support higher rates of successful secondary school completion, enrollment in postsecondary training, and subsequent entry and maintenance of competitive, integrated employment. There are currently 21 such agreements in place.
- Project SEARCH this nationally recognized program is a one-year high school transition internship program providing training and education leading to employment for individuals with intellectual and developmental disabilities. SCVRD has seen Project SEARCH programs expand in South Carolina to fourteen sites.
- Postsecondary Programs for Individuals with Intellectual Disabilities SCVRD collaborates with the five postsecondary programs in South Carolina for young adults with intellectual disabilities:

- o Carolina LIFE,
- o Clemson LIFE,
- o Coastal Carolina LIFE,
- o [College of Charleston] REACH, and
- o Winthrop Think College.

Each program has an SCVRD counselor liaison who provides services for eligible students. SCVRD counselors monitor progress and assist with transition planning as the student approaches program completion. These efforts support continuity and coordination of services with the SCVRD office located in the student's hometown. These programs provide students with critical competitive employment and independent living skills. SCVRD counselors work closely with staff and students to explore careers, determine a suitable vocational goal, and assist with job placement.

SCVRD continues to explore and develop new initiatives that promote successful post-school outcomes for students with disabilities. These outcomes include competitive, integrated employment, independent living, community participation and postsecondary education.

(e) <u>Cooperative Agreements with Private Nonprofit Organizations</u>. Describe the manner in which the designated state agency establishes cooperative agreements with private non-profit VR service providers.

The designated state unit, the Statewide Independent Living Council established under Section 705 of the Rehabilitation Act of 1973 as amended by WIOA, and the independent living centers described in Part C of Chapter I of Title VII of the Rehabilitation Act have developed working relationships and coordinate their activities. In addition, TASC is an interagency group whose mission is to increase successful student postsecondary transition outcomes through active, interagency collaboration. With 16 partner agencies, TASC works to support transition services through training, professional development, and technical assistance provided to local interagency teams that provide direct transition services, both at the preemployment stage and following postsecondary activities. SCVRD has cooperative agreements and works collaboratively with other non-profit organizations and partners such as the SC Developmental Disabilities Council, Spinal Cord Injury Association, and multiple other community organizations.

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

Describe the designated state agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

SCVRD's supported employment goals and plans regarding the Title VI program are based on an analysis of the comprehensive statewide needs assessment and the department's performance on the common performance measures as well as agency key performance indicators. The priorities are as follows:

- Strengthening service delivery afforded to individuals whose disabilities and vocational needs are so significant that SCVRD's 110 traditional program services would not be sufficient to meet their employment needs;
- Providing services to people with the most significant disabilities, especially SSI and/or SSDI recipients, in order to successfully achieve and maintain competitive employment in integrated work settings; and
- Providing supported employment services to youth with the most significant disabilities.

In SFY 2019, SCVRD used designated funds received under section 603 of the Rehabilitation Act for the provision of supported employment services for the following goals and priorities:

- Job coaches serving the Conway, Sumter, Spartanburg, and Lexington areas.
- SCVRD continues its partnership with DDSN in an ongoing demonstration project designed as an intensive placement and support program in the Lexington area. DDSN makes referrals to a specified VR counselor and job coach who are designated to exclusively serve these consumers. This demonstration project incorporates many of the IPS evidence-based practices in providing services to individuals with most significant disabilities, including those with intellectual disabilities. The key practices focus on individualized, consumer-centered services to assist persons with cognitive impairments and emphasize rapid job placement, as appropriate, into competitive, integrated jobs. Follow up supports are provided in integrated work settings. In SFY 2019, the Lexington site achieved a 100 percent rehabilitation rate.

Activities with funds reserved for services for youth with the most significant disabilities (section 603(d)) included the following:

- Project SEARCH is a national model based on intensive internship experience and job coaching. It pairs students in their final year of school with a host business/employer site that includes a series of internships to build job skills as well as to explore career opportunities. This program model is business-led, with partner support provided through the school district, VR, Developmental Disabilities agencies and other community partners. It focuses on serving young adults with intellectual and developmental disabilities, as well as other students who may not otherwise have access to the immersion-based approach of this program. Interns in Project SEARCH train in real work settings, which allows the program staff to teach competitive, marketable, and transferable skills. The outcome goal of the program is competitive, integrated employment. The first site in South Carolina was established in Spartanburg during SFY 2014. This has now expanded to fourteen sites. In this program, students participate in a series of internships at a host business site, receive intensive instruction and job coaching, and are placed into competitive employment, often at the host business site, and often prior to completion of their final year of high school. The ten sites that have been operating for longer than one year have an average success rate of 77% (participants achieving competitive, integrated employment).
- SCVRD leverages other public and private funds to increase resources for extended services. Extended services providers are identified in each area to provide follow along and extended services following successful exit from the VR program. Partnerships at the state and local level with DDSN and the local DSN boards and other DDSN-contracted providers continue to grow and provide key linkages to extended services providers.
- Strategies that contributed to the achievement of overall goals and specific objectives included:
 - o Review and measurement of key performance indicators on a quarterly basis;
 - o Monthly monitoring and specialized reporting on the results of outreach efforts to underserved and emerging disability populations;
 - o Monthly monitoring and specialized reporting on services to youth and Pre-Employment Transition Services;
 - O Dedicated staff for specific populations and specialized services: school-to-work transition; deaf and hard of hearing; supported employment; and
 - Demonstration programs to enhance supported employment services and services for youth with the most significant disabilities, individuals diagnosed with ASD, and demanddriven training based on community labor market information.
- g) Coordination with Employers. Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

- (1) VR services; and
- (2) transition services, including pre-employment transition services, for students and youth with disabilities.

SCVRD utilizes multiple methods of working with employers to identify competitive, integrated employment and career exploration opportunities to facilitate the provision of VR services for adults and transition services, including Pre-Employment Transition Services, for students and youth with disabilities. On a statewide and local basis, the Business Partnership Network, or BPN, provides an opportunity for regular engagement with business partners to gain input on hiring needs, training curricula, and opportunities for outreach with business and industry. Business Advisory Councils (BACs) are established to provide input on specific programs, such as the IT Training Centers, in Columbia and at the Bryant Center in Lyman. Members of the BAC assist in evaluating courses of study and curricula to ensure SCVRD stays current with what is needed in the workplace for IT professionals. Also, SCVRD utilizes Business Development Specialists (BDSs) across the state, whose role is to identify opportunities for training, workbased learning, job development and placement, and emerging career pathways. BDS staff also participate in the SC Sector Strategies partnership in an effort to develop a system that supports strong regional economies by aligning the resources of all partners, public and private, toward developing a workforce supply chain that enhances development of consensus-based targeted industry sectors and creates meaningful career pathways for a range of workers with various skill levels. They work collaboratively, in an integrated fashion, to address any skill gaps and to ensure that the talent pipeline process is fully developed. The BDS staff also use an internal data system to capture and distribute information to ensure that all staff data efforts are fully leveraged and that the team is operating from the same information. BDS staff participate on local business service teams, along with partners from SC Works and LWDBs, to provide a coordinated approach to business development activities. BDS staff also work with transition counselors and coaches to identify opportunities for work-based learning experiences, internships, apprenticeships, and OJT for students in conjunction with the Pre-Employment Transition Services that are provided in high school settings. And, they help address roadblocks and process obstacles that cannot otherwise be resolved.

- (h) Interagency Cooperation. Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:
 - (1) the State Medicaid plan under title XIX of the Social Security Act;

SCVRD has established a Memorandum of Understanding (MOU) with DHHS, the agency responsible for administering the state Medicaid plan. This MOU outlines roles, responsibilities, and collaborative efforts of both agencies. The purpose and objectives of this MOU include strengthening the partnership between the two agencies, with the ultimate outcome of developing opportunities for competitive, integrated employment for Medicaid beneficiaries who have disabilities. SCVRD staff have provided an in-person overview of the vocational rehabilitation program for relevant DHHS staff, and a quarterly meeting schedule has been established for joint planning of ways to enhance the partnership and improve outcomes for dual consumers.

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

SCVRD is currently working with DDSN to incorporate guidance received from the Centers for Medicare and Medicaid Services (CMS) and the Workforce Innovation Technical Assistance Center (WINTAC) into an enhanced MOU aimed at addressing sequencing of services and braiding of funding for complementary service provision to jointly served consumers.. Staff works collaboratively with local Disabilities and Special

Needs (DSN) boards and other DDN-contracted providers in serving individuals in need of supported employment services and long-term follow along supports to maintain competitive, integrated employment. DDSN has representatives on TASC to assist in school-to-work transition efforts as well as ensuring youth with the most significant disabilities have access to the supports needed to gain and maintain competitive employment. Through these efforts, consumers are served in a complementary fashion based on the expertise and distinct roles of each agency.

In addition, SCVRD works closely with the SC Developmental Disabilities Council, an Executive Program designated to the SC Department of Administration. Collaborative efforts include partnering on many projects and grant-funded initiatives, as well as being signatories to an MOU for the TASC.

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

SCVRD works collaboratively with DMH and has an established MOA that outlines roles, responsibilities, and referral procedures. In addition, several cooperative agreements are in place across the state for Individualized Placement and Support (IPS) caseloads to provide rapid placement and job coaching for individuals with severe and persistent mental illness. In 2019, DMH expanded its IPS Program to every mental health center in the state. There are currently 17 IPS sites in South Carolina. Transition counselors working within the schools to provide Pre-Employment Transition Services coordinate with school-based mental health counselors to identify students in need of services, whether that is VR or mental health services. Through this "no wrong door" approach, students in need of services are connected to the appropriate resources in a timely manner.

- (i) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development. Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:
 - (1) Data System on Personnel and Personnel Development
 - (A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
 - (i) the number of personnel who are employed by the state agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;
 - (ii) the number of personnel currently needed by the state agency to provide VR services, broken down by personnel category; and
 - (iii) projections of the number of personnel, broken down by personnel category, who will be needed by the state agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Staffing patterns are set through a joint effort of the SCVRD commissioner, director of human resources, executive staff, and local supervisors. Employee turnover data are reviewed in an effort to determine trends and to identify staffing concerns. In addition, succession planning for critical need positions is being managed through the department's Leadership Development Program (LDP). The LDP is a more targeted approach to succession planning than the former program (the Professional Development and Leadership Program). The LDP was designed to maximize the use of our staff members' time and to better meet the specific talent needs of the Agency. SCVRD utilizes a caseload management system that allows for monitoring and planning for service delivery capacity based on referral sources and the projected number

of individuals expected to receive services. Below is a chart, which provides details, by personnel category, on the number of personnel needed and currently employed in the provision of vocational rehabilitation services at SCVRD.

STAFFING PATTERNS

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Counselors	203	20	122
2	Area consumer services managers	24	4	14
3	Vocational evaluators and job prep. instructors	39	7	23
4	Job-readiness trainers	77	13	46
5	Area supervisors	26	3	16
6	Training center managers	31	0	19
7	Employment/job coaches	35	9	23
8	Administrative & team support specialists and area administrative assistants	73	12	44
9	Addictions counselors	5	1	3
10	Transition coaches	14	4	8
11	Business Development Specialists	19	2	11

- (B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:
 - (i) a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;
 - (ii) the number of students enrolled at each of those institutions, broken down by type of program; and
 - (iii) the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.
- i. SCVRD maintains close relationships with the University of South Carolina and South Carolina State University, both of which produce graduates who have Master's degrees in rehabilitation counseling. SCVRD has opted to use a state Comprehensive System of Personnel Development (CSPD) standard and can recruit not only from candidates with a Master's degree in rehabilitation counseling, but also with a Master's degree in related fields. These strategies satisfy staffing needs.

ii. The following chart shows statistics for the in-state university vocational rehabilitation counseling degree programs. All graduates are eligible for Certified Rehabilitation Counselor (CRC) certification and the South Carolina Licensed Professional Counselor (LPC) designation. As of this date, 2 have obtained their CRC certification. Data are collected annually by program directors at each university and shared with executive staff to assist in current and future staffing.

MASTER OF REHABILITATION COUNSELING DEGREES

Row	Institutions	Total MRC/MA students enrolled	sponsored by agency and/or	sponsored by agency and/or	Total MRC/MA graduated from the previous year
1	SC State University Rehab. Counseling Program	45	7	20	30
1)	University of South Carolina Rehab. Counseling Program	40	10	9	9

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel. Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Progress toward meeting the required CSPD standard began in January 2001. The department has a working relationship with the University of South Carolina and South Carolina State University (a historically black university), both of which offer all of the courses required by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). A recruitment plan is in place to recruit graduates from all schools in South Carolina as well as out-of-state schools which have counseling and rehabilitation counseling degree programs. When this is not possible due to high demand, the department will continue to hire counselors with closely related Master's degrees. In accordance with South Carolina state law, each transcript is assessed, and the counselor is placed in a plan that allows up to 30 months to complete the current state educational requirements.

The University of South Carolina and South Carolina State University prepare individuals for graduate degrees in rehabilitation counseling. SCVRD conducts outreach programs to these universities and other universities to include: publications and distribution of targeted recruiting material, attendance at career days and job fairs, and recruitment events. In addition, practicum placements and internships are offered to students who are in CSPD qualifying programs. These efforts are designed to recruit qualified personnel, including minority graduates and those with disabilities. SCVRD Human Resources and Human Resources Development offices coordinate recruitment efforts with active support from local supervisors.

Employees of the department work with school officials to provide input for curriculum development for the graduate school programs. SCVRD leadership has actively participated on advisory boards for the rehabilitation counseling programs at the University of South Carolina and South Carolina State University. SCVRD has been especially successful in recruiting personnel from the South Carolina universities, particularly those from minority backgrounds. Students from these programs and out-of-state programs

are encouraged to accept student internships and practicums placements with the department. The HRD staff, with input from the human resources department, coordinates the placement of non-paid practicum and internships, and the human resources department coordinates placements for students who qualify for paid internships. In addition, university faculty members periodically conduct skills classes for staff at department facilities.

A substantial New Employee Orientation program is vital to the recruitment and retention of SCVRD staff. All new staff members are required to complete New Employee Orientation Parts I, II, and III. New Employee Orientation is intensive and comprehensive. The orientation program incorporates training in the following topics:

- A history of vocational rehabilitation
- Philosophical overview
- SCVRD agency mission, policies, procedures, and benefits
- An overview of training requirements and an intro to online training
- Ethics in the workplace
- Consumer Relations and CAP (Client Assistance Program)
- Disability awareness and disability etiquette
- Customer service
- True Colors (personality assessment for team building)
- Medical and psychosocial aspects of specific disabilities
- Safety in the workplace
- Nonviolent crisis intervention
- Cyber Security and Personally Identifiable Information (PII)
- Panic alarm system
- Human Resources Development
- Communications
- Time management
- Job specific training
- SCVRD Grievance Procedures for Handling Consumer Discrimination Complaints

New employees are assigned mentors, participate in job shadowing, and receive performance coaching from their supervisors.

New counselors and selected direct service delivery staff are required to take the following training sessions:

- Motivational Interviewing
- Medical terminology (for those who did not have this as a graduate course)
- Consumer Services training
 - *Counseling Skills training
- Rehabilitation technology online trainings

In addition to the New Employee Orientation program and to retain qualified staff, SCVRD uses a system for staff evaluation that is a modification of a system that is available to all state employees (The Employee Performance Management System or EPMS). The system focuses on the individual employees' job duties compared to stated goals and objectives. These goals and objectives are identified and discussed with the employee at the beginning of the rating period. Ongoing communication between the employee and supervisor clarifies the employee's understanding of how to meet the performance standards and enhance service delivery to the consumer.

At the conclusion of the rating period, an evaluation is performed to rate the employee on each duty in relation to performance objectives. The system provides for employee input into the development of the goals and objectives in order to support successful performance.

Another feature of the system allows objectives to be amended throughout the review period. This system also provides a mechanism for helping a substandard performer improve and a means of removing an employee from a position should performance not improve to an acceptable level. It is as follows:

- A covered employee is entitled to adequate notice of substandard performance and the opportunity to improve the substandard performance before receiving a "below performance requirements" rating and being removed from the position. If during the performance period an employee is considered "below performance requirements" in any essential job function or objective which significantly impacts performance, the employee may be provided with a written "Warning Notice of Substandard Performance." The warning notice shall provide for an improvement period of no less than 30 days and no more than 120 days. The warning notice may be issued at any time during the review period. An employee who receives more than two warning notices within a 365-day period shall be removed from the position. A warning notice is not required on the third occurrence.
- The department has developed career path matrices for staff to encourage retention of qualified staff and promotion to higher level positions. These career paths are keyed to requirements in the areas of education, experience, productivity, quality, and training. The matrices include elements related to the department's Program Integrity model which emphasizes a balance among customer service, compliance assurance, and productivity. Counselors are required to meet the state's CSPD standard within the required time frame in order to maintain status as a counselor and to advance to a higher level. A counselor who does not achieve the state CSPD standard within the required timeframes will be removed from his/her position. The career path matrices are published on SCVRD's intranet site.
- The department takes an active role in employee/employer relations. Through strong leadership and the assistance of all staff, the department provides a healthy and safe work environment. Employee behavior and performance problems are dealt with appropriately and in a timely manner, with an emphasis on assisting the employee to improve. The department promotes internal and external customer service and has made teamwork an integral part of day-to-day operations. The department's Celebration of Success program (a reward and recognition system) allows employees to recognize coworkers for customer service, productivity, program excellence, as well as individual accomplishments.
- (3) Personnel Standards. Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a) (7) (B) and to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:
 - (A) standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and
 - (B) the establishment and maintenance of education and experience requirements, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.
- A. Section 101(a)(7)(B) of the Act; 34 CFR 361.18 indicates that the state VR agency is to establish and maintain standards to ensure that all professional personnel are prepared and trained and that the

standards are consistent with national or state approved requirements. Given this option of selecting federal or state standards in order to achieve stability regarding standards and to develop a diverse staff, SCVRD has opted to use state standards to manage its CSPD, which are consistent with the initial guidelines. In 2006, the South Carolina General Assembly passed a bill, which established a state standard for the minimum educational and training requirements for counselors of the public vocational rehabilitation agency. This bill was signed by the governor on March 15, 2006. Under this state law, the department can continue its practice of hiring individuals with rehabilitation-related Master's degrees while mandating that they complete Master's level rehabilitation courses commensurate with their degree. The law reads as follows:

A State Agency of Vocational Rehabilitation Counselor must meet the following standards: a Master's degree in rehabilitation counseling, a master's degree in the field of counseling with a graduate course in theories and techniques of counseling, or a Master's degree in any discipline. In addition to the Master's degree, the individual shall be required to document at least 18 credit hours of coursework at the Master's level or above, within thirty months of date of hire, in the core areas that follow: one graduate course with a primary focus on the theories and techniques of counseling and three graduate courses, each with a primary focus on one of the following areas: occupational information, job development and placement, medical aspects of disabilities, foundations of rehabilitation, psychological aspects of disabilities, and personal and vocational adjustment; and two graduate courses, each with a primary focus on one of the following areas: assessment, research methodology, vocational and career development, community resources, case management, and delivery of rehabilitation services, or a current Certified Rehabilitation Counselor (CRC) certification, regardless of degree.

As stated in detail in the previous section of this document, qualified candidates are recruited from universities who meet the minimum requirements of the state's CSPD standard. Internships and practicum opportunities are also offered to qualified candidates. Each candidate's transcript is reviewed and evaluated. New hires who do not meet the standard are immediately placed in a program to meet the standard within the 30-month time frame.

Of the 306 general counselors (includes counselors, and 8 addictions counselors and area consumer services managers) who are currently employed by SCVRD, 272 meet the state's CSPD standard for a rehabilitation counselor. Thirty-four (34) counselors have Master's degrees in a related field and are currently under a plan to complete requirements.

Funding support for the implementation of a retraining plan to assist VR counselors to meet the state educational requirement of CSPD has traditionally been provided by the department's In-Service Training Grant. Due to discontinuation of the RSA in-service training grant this cost has been absorbed into the agency's overall budget effective 10/1/2015. Other funding options may be provided by RSA grants, if available. Evaluation of the plan to ensure that VR counselors meet the CSPD requirements is conducted through an analysis of transcripts and the department's electronic training records.

B. As part of the agency's initiative to expand skills-based, demand driven training, staff are currently trained on accessing and utilizing labor market information for their local communities. In coordination with local BDSs, staff identifies in-demand industries and occupations and develops localized training or connects with the technical college system and other institutions of higher education to provide consumers access to training commensurate with the evolving labor force. In addition, SCVRD is a partner in a statewide Talent Pipeline/Sector Strategies Project aimed at closing skills gaps and meeting the workforce needs of the current and emerging labor market through collaborative development of career pathways and identification of training and certifications required by employers to meet their hiring needs.

Paraprofessional staff must meet minimum hiring requirements according to position descriptions.

- (4) Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a) (7) (C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:
 - (A) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
 - (B) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.
- A. SCVRD conducts needs assessments in order to plan for a balanced HRD program for all staff. The assessments take into account skill development, as well as long-range career opportunities directed toward developing and strengthening the role of qualified rehabilitation professionals and paraprofessionals. Needs assessments are conducted and evaluated by supervisors and HRD. The information is collected from multiple sources and formulated into a comprehensive HRD program. Institutions of higher education and appropriate professional associations are used to facilitate the recruitment, preparation, and retention of qualified personnel.

In addition to these efforts, the department provides, when appropriate and subject to the availability of funds, tuition assistance to employees who are taking work-related courses.

As part of its retention and succession planning, the department has completed its transition from its generalized Professional Development and Leadership Program to a more role-oriented Leadership Development Program (LDP) that will address immediate needs identified through evaluation of critical positions. The plan provides career development opportunities for staff via career paths, and targeted training opportunities. Five SCVRD staff members were in the first "graduating class" of this program in 2019. The Human Resource Development department provides professional development courses for staff statewide. The agency utilizes training provided by various technical assistance centers and other training professionals, management/supervision courses offered by the South Carolina Division of Human Resources and in-house training. A separate Supervision and Management track continues that focuses on meeting the training needs of new and existing supervisors. During this year, supervisors received training on various leadership topics to include communication, conflict management, coaching, managing priorities and projects, managing emotions under pressure, supervisory practices, and teambuilding.

SCVRD has an extensive HRD department that facilitates training for all employees, with programmatic training being provided by internal and external subject matter experts. The department provides/sponsors trainings that focus on medical, psychosocial, and vocational aspects of specific disabilities, and feature the application of assistive technology as appropriate. Recent topics include: disability etiquette, brain injury, alcohol/drug addictions, multiple sclerosis, mental illness, autism, deafness and hearing impairments, epilepsy, learning disabilities, musculoskeletal, spinal cord injury, diabetes, as well as other disability-specific trainings. Workshops on transition from school to work, HS/HT, supported employment, job retention services, vocational assessment, serving ex-offenders, serving the Hispanic/Latino population, leadership development, and maintaining a culture of quality were also provided.

Counseling skills training is provided on an ongoing basis with a focus on motivational interviewing techniques. A series of statewide trainings focusing on providing specific counseling skills and the application of those skills within the VR setting to counselors and other staff who provide direct services to consumers also began in 2013 and will continue for all designated new staff.

All direct consumer service delivery staff receive training on job placement and developing employer relationships. In addition, trainings focusing on living with spinal cord injury, coaching for engagement, and vocational assessment in school-to-work transition were provided.

In addition to the focus on technology in specific trainings, SCVRD has two in-house rehabilitation technology centers. Rehabilitation technology engineers provide training and support to staff, businesses and consumers as well as tours and presentations for the community. Rehabilitation technology engineers offer onsite services as well as services from the two regional locations. The agency also has a series of eight online training modules that focus on the identification of the need for rehabilitation technology services and application of those services.

Role-specific training is provided for all direct service delivery staff. Customer service, true colors training, ethics, disability awareness/etiquette, safety training, nonviolent intervention, panic alarm training, and a course on securing personally identifiable information are requirements for all employees.

Progress continues in building an online library of disability-specific modules which are available upon demand. These modules are interactive and competency based. As always, the impact of these training efforts on staff performance will be assessed and the recommendations considered for the improvement of future training programs. As prior training plans included training on the 1998 Rehabilitation Act, the current training plan will include objectives that focus on WIOA, informed choice, disability-specific trainings and transition.

SCVRD staff participate in relevant disability related conferences. These conferences offer current information on disabilities and initiatives in vocational rehabilitation.

B. Numerous local trainings take place and extensive research is conducted when planning these sessions in order to provide the most up-to-date information that will assist staff in providing quality services to consumers. When conducting disability-related trainings, SCVRD uses physicians, individuals who experience the specific disabilities and other experts who are current with the latest research in their field. For designated staff, the department sponsors attendance at graduate courses that provide information on cutting-edge initiatives in the field.

Executive staff is actively involved with the Council of State Administrators of Vocational Rehabilitation and the South Carolina Vocational Rehabilitation Association. Staff also subscribe to numerous professional and research journals.

(5) Personnel to Address Individual Communication Needs. Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

SCVRD has current personnel recruitment and training policies that are reflective of the findings of the US Census Bureau, including the 2017 American Community Survey (ACS). This estimates that 27.0 percent of South Carolina's population identified themselves as African American. This number represents a 1 percent decrease since the 2010 ACS report. Additionally, 5.7 percent of South Carolina's population identified themselves as Latino or Hispanic, per the 2017 ACS, and the department sponsors Spanish classes for staff to facilitate communication with this minority group. Hiring incentives are also utilized for staff who are bilingual in English and Spanish, which has resulted in an increased number of staff who are bilingual. The remaining minority populations are distributed among Native Americans, Asian, or dual race.

In addition, the department continues to place emphasis on services for individuals who are deaf to ensure that a counselor in each area can communicate effectively. The department takes advantage of web-based trainings. In addition, weekly American Sign Language (ASL) classes are provided for Rehabilitation

Counselor for the Deaf (RCD). The department has a certified interpreter on staff who provides video remote and on-site interpretation, as well as serving as a Consumer Services Specialist for this area of expertise. In addition, qualified interpreters are used if accessing a certified interpreter would delay service provision.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

TASC is a robust state-level interagency collaborative that works in support of increasing positive postsecondary outcomes for students with disabilities. It has multiple stakeholder agencies and organizations, and supports local level interagency teams through training, technical assistance, and strategic planning.

The department continues to coordinate the development of designated staff with emerging initiatives by the SCDE and the 81 local school districts (LEAs) under IDEA and state school-to-work transition efforts. Transition training efforts included the following: a two-day transition summer series was conducted for transition staff that included presentations and training on Pre-Employment Transition Services, vocational assessment, use of ACT and Work Keys assessments, referral development, best practices, documentation and use of school records, work experiences, using O*Net, and postsecondary training. Selected transition staff participated in a session on active training techniques and self-determination. Over 40 transition staff participated in an annual interagency transition conference, focused on local interagency planning and content sessions focused on effective service delivery for students with disabilities. Youth leaders also participated in the conference. Disability-specific modules on learning disabilities, intellectual disabilities and autism spectrum disorders are available for all staff via LOTIS, the agency's online training site. In addition to the disability-specific training modules, a module on transition basics, with a focus on evidencebased practices and quality service delivery, has been developed and is delivered in person to all SCVRD transition personnel. This has become the standard training for all new staff working with transition students. The agency continues to work collaboratively with the SCDE to provide training as a component of their State Personnel Development Grant - Project Gateway. In addition, selected transition staff participate in training on transition assessment and facilitating work experiences offered through the SCDE's annual research to practice training.

The TSS/TSC collaborative approach to the provision of transition services was continued this year in five schools. This approach designates a transition services specialist – who is a school district employee – or a designated VR counselor, to act as a liaison to refer students to the department and assist these students in participating in transition activities and work-based experiences in the community. This outreach effort has improved access to VR services for students with disabilities in the areas in which the program is operating and has increased our collaborative efforts with the local school district.

The department continues to designate a liaison counselor who provides Pre-Employment Transition Services to each public secondary school throughout the state. During this past year state office and local staff have provided in-service training to school staff, parents, and students regarding service availability. Also, cooperative agreements with DJJ and the Will Lou Gray Opportunity School afford the ability to work collaboratively to serve at-risk youth prior to their exit from high school.

(j) Statewide Assessment.

(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

- (A) with the most significant disabilities, including their need for supported employment services;
- (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 development system; and
- (E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other 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.

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES.

SCVRD designs new initiatives, enhances existing programs, and refines policies and procedures based on many factors. This includes continuous program assessment and evaluation by analyzing statistical trends and utilizing input from constituency groups. In keeping with SCVRD's strategic plan and, as specified by the Rehabilitation Act, as amended, this feedback loop begins with the CSNA.

A variety of source information is used, including information from the United States Census Bureau's American Community Survey (ACS), Rehabilitation Services Administration (RSA), Cornell University Employment and Disability Institute (EDI), Bureau of Labor and Statistics (BLS), US Centers for Disease Control (CDC), and the Social Security Administration (SSA). SCVRD conducts ongoing internal and external customer satisfaction surveys and uses this information to strengthen service delivery.

South Carolina's unemployment rate has changed from 5.6 percent in 2014 to 3.4 percent in 2019 (Bureau of Labor Statistics, BLS Local Area Unemployment Statistics). Although the unemployment rate has substantially decreased, the gap in employment rates for individuals with disabilities remains large. In 2017, the employment-to-population ratio for people with disabilities was 35.5 percent, and the employment-to-population ratio for individuals without disabilities was 76.5 percent, amounting to an employment gap of 41 percentage points (2018 Annual Report on People with Disabilities in America, 2018 Annual Report). In South Carolina, the employment-to-population ratio for people with disabilities was 32.6 percent, and the employment-to-population ratio for individuals without disabilities was 76.2 percent, reflecting an employment gap of 43.6 percentage points. As of 2017, there were 376,889 individuals with disabilities aged 18-64 living in the community in South Carolina (2018 Disability Statistics Compendium, 2018 Annual Disability Statistics Compendium). Total population in South Carolina in 2017 was 5,024,369. Population by race reflected the following totals: White alone: 3,380,219, Black or African American alone: 1,357,385, American Indian and Alaska Native alone: 15,007, Asian alone: 76,181, Native Hawaiian and Other Pacific Islander alone: 6,389, Some other race alone: 81,959, Two or more races: 107,229 (ACS 1year estimates, 2017 Table B02001, ACS 2017 1-year estimates B02001). In comparison, those served through SCVRD in SFY 2018 reflected the following: 46.3 percent white, 49.6 percent African American, 0.8 percent Native American, 0.5 percent Asian, 0.4 percent Native Hawaiian and Other Pacific Islander and 2.5 percent Hispanic or Latino.

Youth with Disabilities

Given the emphasis on services for students and youth in WIOA, Figure 1 highlights the number of youth with disabilities in transition. This data, from the 2017 American Community Survey (ACS) retrieved from Cornell University Disability Statistics website www.disabilitystatistics.org, cites the prevalence of disability among non-institutionalized people ages 16 to 20 in South Carolina.

Figure 1	Self-	Independent					
Ages 16 to 20	Disability	Disability Visual Hea		Hearing Ambulatory		Care	Living
Total Numbers Reported	19,600	3,500	2,800	3,200	12,400	2,300	7,900
Percentage	5.6%	1.0%	0.8%	0.9%	3.6%	0.7%	2.3%

Figure 2 reflects the range of disabilities among working age people. This data, from Cornell University, cites the prevalence of disability among non-institutionalized people ages 21 to 64 in South Carolina in 2017.

Figure 2	Any			Self-	Independent			
Ages 21 to 64	Disability	ability Visual Hearing Am		Ambulatory	Ambulatory Cognitive		Living	
Total Numbers Reported	363,900	74,900	62,400	192,100	141,900	63,200	126,900	
Percentage	13%	2.7%	2.2%	6.9%	5.1%	2.3%	4.5%	

Labor Force Participation Rates by Disability Type

Figure 3 (data retrieved from Cornell University) illustrates employment rates of noninstitutionalized working age people by disability status in South Carolina in 2017.

Figure 3							
Ages 21 to 64 Employment by Disability Status	Any Disability	Visual	Hearing	Ambulatory	Cognitive	Self- Care	Independent Living
Total Numbers Reported	119,900	32,700	33,000	40,500	36,100	6,900	13,900
Percentage	33.0%	43.6%	53%	21.1%	25.4%	10.9%	11.0%

Figure 4 (data retrieved from Cornell University) illustrates the number and percentage of non-institutionalized persons aged 21 to 64 with a disability who were not working, but actively looking for work in 2017.

Figure 4							
Ages 21 to 64 Not Working but Actively Looking for Work by Disability Status	Any Disability	Visual	Hearing	Ambulatory	Cognitive	Self- Care	Ind. Living
Total Numbers Reported	17,500	4,500	3,300	5,600	9,000	1,600	5,800
Percentage	7.2%	10.7%	11.2%	3.7%	8.5%	2.8%	5.1%

SSI/SSDI Recipients

According to the Social Security Administration 174,597 South Carolinians received Social Security Disability Insurance (SSDI) in 2017 (SSA OASDI Beneficiaries by State and Zip Code, 2017). There were 63,200 individuals ages 21 to 64 in South Carolina that received Supplemental Security Income (SSI) (ACS 2017 retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org). In 2017, there were 20,247 individuals aged 18 to 64 who received both SSDI and SSI based on disability (SSA Recipients of Social Security, SSI, or both). This reflects a substantial talent pool of individuals with barriers to employment. These individuals may not be reflected in the totals for unemployed as many of these individuals may not be actively seeking work or have never worked (SSA).

The provision of early intervention services is a major issue given the long application process associated with making eligibility determinations for both the SSI and SSDI programs. There will be a need for increased supported employment services to improve the employment outcomes of many SSI/SSDI recipients. As a total count, the number of SSI/SSDI recipients who are currently receiving services by SCVRD is 4,101 as of June 2019.

Individuals who are Deaf or Hard of Hearing

During SFY 2018, SCVRD served 663 persons with a hearing disability (count of referrals determined eligible or evaluated with Trial Work Experience plan) which represents a 43% increase since SFY 2015. South Carolina has a prevalence of hearing impairments of 2.1 percent of the population, or 63,700, aged 18-64 (ACS 2017 retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org). The South Carolina Association of the Deaf (SCAD) has identified numerous resources for SCVRD counselor use since collaboration began in May of 2012. SCVRD has continued outreach and increased services to individuals that are deaf or hard of hearing.

Emerging Disabilities

The increased need for services for individuals from identified emerging disabilities was identified in this needs assessment.

According to the Centers for Disease Control and Prevention, the prevalence of Autism Spectrum Disorder (ASD) continued to increase with one in fifty-nine children identified with ASD nationally based on a 2014 sample of 8 year-olds from communities in the CDC's Autism Data and Developmental Disabilities Monitoring Network. The Special Education Child Count estimates for overall ASD prevalence in South Carolina in 2016 were 9.6 per 1,000 children, reflecting an increase from 1.3 per 1,000 children in the year 2000 (CDC autism data visualization tool, retrieved 6/24/19: CDC ASD Homepage Data & Statistics).

The National Center for Health Statistics (NCHS Data Brief No. 291, November 2017, retrieved 6/24/19: NCHS Data Brief 291) indicates that during 2014 – 2016, the prevalence of children diagnosed with any development disability significantly increased from 5.76% to 6.99%.

Students and youth with intellectual/developmental disabilities and multiple disabilities continue to need specific services from SCVRD. Of the current students SCVRD served in June 2019, 80% were identified as having a cognitive impairment. During SFY 2018, SCVRD served 596 individuals with Intellectual Disability (count of referrals determined eligible or evaluated with Trial Work Experience plan). Providing vocational rehabilitation services to students and youth with the most significant or multiple disabilities, including Pre-Employment Transition Services and supported employment services, is an area of focus for SCVRD.

Another area of identified need is response to the increase of traumatic brain injuries (TBI) through outreach and a focus on serving more individuals with brain injuries. This includes the general population as well as veterans. According to the Brain Injury Association of South Carolina, 61,000 South Carolinians have a TBI-related disability (Brain Injury Association of SC, retrieved 6/24/19, http://www.biaofsc.com/resources.htm#Facts).

The number of TBI-related emergency department visits, hospitalizations, and deaths in the general population in the US has increased 53% from 2006 (approximately 1.88 million) to 2014 (approximately 2.88 million) according to the CDC (CDC TBI Data and Statistics). The Department of Defense estimates that 22% of all combat casualties from Iraq and Afghanistan are brain injuries (U.S. Department of Veterans Affairs, retrieved 6/24/19: DVA Office of Research & Development TBI).

Data from the 2017 ACS shows that in South Carolina an estimated 28.2% of veterans aged 21 to 64 (52,500) reported a VA service-connected disability (retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org). The prevalence of traumatic brain injuries in the veteran population created a shift in the mission of the Defense and Veteran Brain Injury Center (DVBIC). DVBIC's efforts are focused on state-of-the-science care from point-of-injury to reintegration for service members, veterans, and their families to prevent and mitigate consequences of mild to severe TBI. In South Carolina, SCVRD has been an active member of the Veterans Policy Academy since the summer of 2008 and continues to collaborate with the other agencies/entities to address the service needs of veterans with disabilities to ensure their return to the workforce.

According to the Spinal Cord Injury (SCI) Statistical Center (2019 SCI Data Sheet, retrieved 6/24/19, NSCISC 2019 Data Sheet), the annual incidence of SCI is approximately 54 cases per one million people, or about 17,730 new SCI cases each year. Since 2015, 17% of persons with SCI are employed at year 1 post-injury.

SCVRD is actively pursuing strategies to increase outreach to this group through collaboration with the Spinal Cord Injury Association of South Carolina and other interested groups.

SCVRD's ongoing focus on outreach to individuals with most significant disabilities results in a sustained need for supported employment services in South Carolina. Through efforts to make Pre-Employment Transition Services (Pre-ETS) available to all potentially eligible students, this results in increased interaction and service provision for students with ASD, ID/DD, students who are deaf, and students with significant or most significant physical disabilities who may not have previously considered competitive, integrated employment as a post-school outcome. Through collaborative work with the Department of Disabilities and Special Needs, the Developmental Disabilities Council, Centers for Independent Living and the Disability Employment Coalition, identification and outreach to individuals requiring supported employment services is increasing. This is also in conjunction with the state's Employment First initiative, which seeks to ensure that the first option for all individuals with disabilities who want to work is competitive, integrated employment. SCVRD has a longstanding partnership with the SC Department of Mental Health and provides services collaboratively using the Individualized Placement and Supports (IPS) model for consumers with severe and persistent mental illness. The number of IPS programs and locations across the state will be expanding in SFY 2020.

Data show that the percentage of all consumers who received supported employment services were as follows:

Figure 5	FFY 2015	FFY	FFY	SFY
Of All Consumers Served		2016	2017*	2018
Receiving Supported Employment Services	7.7%	6.9%	6.2%	6.2%

^{*}FFY 2017 data collection represents a 9-month period. New data collection requirements were implemented 7-1-17 for the RSA-911 Federal Case Services Report.

Figure 6 Of All Consumers Under Age 25	FFY 2015	FFY 2016	FFY 2017*	SFY 2018
Receiving Supported Employment Services	14.0%	13.0%	13.1%	13.6%

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES

According to 2017 US Census Bureau estimates, South Carolina remains a state with a large minority population. Total population in South Carolina in 2017 was 5,024,369. Population by race reflected the following totals: White alone: 3,380,219 (67%), Black or African American alone: 1,357,385 (27%), American Indian and Alaska Native alone: 15,007 (0.3%), Asian alone: 76,181 (1.5%), Native Hawaiian and Other Pacific Islander alone: 6,389 (0.13%), Some other race alone: 81,959 (1.6%), Two or more races: 107,229 (2.1%) (ACS 1-year estimates, 2017 Table B02001, ACS 2017 1-year estimates B02001). The population in

South Carolina that was Hispanic or Latino in 2017 was 285,990 (5.7%) (ACS 1-year estimates, 2017 Table B03003). South Carolinians have a 14.7 percent rate of disability. By race, prevalence estimates of disability in 2017 were as follows: White 14.8%, Black or African American 15.5%, Native American or Alaska Native 21.6%, Asian 6.3%, and Some Other Race(s) 10.7%. The rate for Hispanic and Latino individuals is 7.3%. (Retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org).

In comparison, individuals served through SCVRD in SFY 2018 reflected the following: 46.3 percent white, 49.6 percent African American, 0.8 percent Native American, 0.5 percent Asian, 0.4 percent Native Hawaiian and Other Pacific Islander and 2.5 percent Hispanic or Latino.

Historically, SCVRD exceeded the performance level for service to minorities (RSA Minority Service Rate). The ratio for minorities to non-minorities was .952 in 2014 and .967 through December 2015. These ratios indicate that minority populations are proportionately represented among the individuals who receive SCVRD services.

African American Population

In the 2017 estimates from the US Census Bureau's ACS, 27 percent of South Carolina's population identified themselves as African American. This number represents a 1 percent decrease since the 2010 ACS report. Of the 1.3 million African Americans living in South Carolina, 15.5 percent of persons report having a disability. This is a higher percentage than in the population at large where 14.7 percent of persons report have a disability (retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org).

Native American Population

According to the 2017 ACS, 15,007 South Carolinians identified themselves as being "American Indian and Alaska Native." This number represents minimal growth (0.03%) since the 2010 US Census, and constitutes less than 1 percent of the state's total population.

This population (American Indian and Alaska Native) has the highest incidence of disability among demographic groups in South Carolina with 21.6% percent identified with one disability. This is high even when compared with the national average of 15.9 percent of Native Americans with a disability. In SFY 2018, 0.8% percent of individuals that received services from SCVRD identified themselves as Native Americans, an increase from 0.4% in SFY 2017.

Since the American Indian Vocational Rehabilitation Services (AIVRS) grant is not awarded in South Carolina, awareness of public VR services may be low for Native Americans in the state. Efforts to increase the number of Native Americans who seek and participate in SCVRD services will continue through outreach in communities where significant numbers of Native Americans live.

Latino/Hispanic Population

Individuals who identified themselves as Latino or Hispanic comprised 2.5 percent of SCVRD consumers in SFY 2018. Population totals in 2017 indicate that 5.7% of the population in South Carolina identify as Hispanic or Latino. An increase in the number of individuals with disabilities in Hispanic and Latino communities seeking vocational rehabilitation services is anticipated. This represents an opportunity to continue strategies to ensure this population is actively served.

C. INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

Older Adults

In 2017, an estimated 25.1 percent of individuals ages 65 - 74 in the US reporting having a disability. In South Carolina, this was 26.7% of the population, or 142,700 individuals (Disability statistics from the ACS

retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org). In SFY 2018, SCVRD provided services to 711 persons aged 65 and older at application.

Veterans

According to the ACS (2017), there are 52,500 veterans aged 21 to 64 with a service-connected disability in South Carolina (Disability statistics from the ACS retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org). As of 2017, the ACS estimated that 9.3 percent of the civilian population were veterans (361,803) (ACS 2017 Table S0201, 1-year estimates).

SCVRD provides services to veterans with disabilities; and, efforts to increase outreach to this population are ongoing. In SFY 2018, SCVRD served 1,516 consumers identified as veterans. SCVRD has established relationships with local employers in all areas of the state, and collaboration with the Veterans Administration is essential to providing the greatest outreach for veterans with disabilities. SCVRD has designated counselors in many locations to work with local VA offices for referrals.

Rural Population

SCVRD has long established the maximum distance a client should have to travel to obtain SCVRD services is 50 miles. This provides ample coverage statewide to all individuals with disabilities who wish to apply for services. However, according to US Census data in 2010, 33.7 percent of the population in South Carolina lives in rural areas compared to 19.2% of the U.S. population (American Fact Finder, Urban and Rural Universe, Total Population 2010 Census Summary File 1). The rural nature of the state lends itself to minimal transit services. Seven out of the 46 counties do not have any type of public transportation (SC MTP Transit Plan, August 2014). The lack of transportation creates an additional barrier for individuals to participate in vocational rehabilitation services and enter the work force. Therefore, SCVRD continues to develop partnerships and methods to ameliorate this barrier.

One such area is the Oconee Pickens office located in Seneca. According to the 2010 Census, (American Fact Finder, P2, Urban and Rural Total Population 2010 Census Summary File 1), the population for Oconee county is 65% rural and Pickens county is 36% rural. With the need to expand capacity for services to reach consumers in this rural setting and bring necessary training services to meet the needs of consumers, business, and industry for customized and demand-driven training, expansion of the existing facility in Seneca is necessary. Although an area analysis shows that an adequate proportion of the community is being served compared to state percentages, the need for space to house staff and to expand training opportunities is established through this needs assessment. The greater upstate region of South Carolina has identified industry sectors with significant skill gaps and workforce development needs that can be met through further development of customized and demand driven training offered through the SCVRD Work Training Center in conjunction with industry and education partners. Further discussion on the needs in Seneca is included in section 2, identification of needs to establish, develop, or improve the community rehabilitation programs within the State.

Disability Types

SCVRD analyzed service provision to consumers by disability categories to assess whether SCVRD successfully served all groups and to establish disability categories that call for more emphasis. The analysis compared four years (FFY 2015- SFY 2018) of SCVRD data focused upon employment outcomes by disabilities. (2011 is the last year RSA published agency report cards. The most recent comparative data available from RSA is from FFY 2013. FFY 2017 data reflects a 9-month period.)

Figure 7 All Consumers Performance Category	FFY 2015 Number	FFY 2015 Percent	FFY 2016 Number	FFY 2016 Percent	FFY 2017* Number	FFY 2017* Percent	SFY 018 Number	SFY 2018 Percent
Visual - Individuals Served	22	0.19779	26	0.22827	33	0.35185	25	0.222064
Visual - Employment Rate	15	68.1818	18	69.2308	26	78.7879	15	60
Auditory and Communicative - Individuals Served	576	5.17846	583	5.11853	495	5.27775	670	5.951324
Auditory and Communicative - Employment Rate	454	78.8194	451	77.3585	390	78.7879	519	77.46269
Physical - Individuals Served	2494	22.422	2863	25.1361	2345	25.0027	2988	26.54113
Physical - Employment Rate	1706	68.4042	1945	67.9357	1489	63.4968	2004	67.06827
Intellectual and Learning disability - Individuals Served	2564	23.0513	2566	22.5285	2010	21.4309	2450	21.7623
Intellectual and Learning Disability - Employment Rate	1455	56.7473	1407	54.8324	976	48.5572	1285	52.44898

Psychosocial and Psychological- Individuals Served	5467	49.1504	5351	46.9798	4496	47.9369	5125	45.52318
Psychosocial and Psychological- Employment Rate	3076	27.6544	2985	26.2072	2293	24.4482	2782	24.71132

Figure 8 Age Less Than 25 Performance category	FFY 2015 Number	FFY 2015 Percent	FFY 2016 Number	FFY 2016 Percent	FFY 2017* Number	FFY 2017* Percent	SFY 2018 Number	SFY 2018 Percent
Visual - Individuals served	5	0.1599	8	0.25397	7	0.28237	2	0.066269
Visual - Employment rate	3	60	5	62.5	5	71.4286	0	0
Auditory and Communicative - Individuals served	75	2.39846	88	2.79365	72	2.9044	95	3.14778
Auditory and Communicative - Employment rate	44	58.6667	55	62.5	42	58.3333	60	63.15789
Physical - Individuals served	168	5.37256	213	6.7619	165	6.65591	185	6.129887
Physical - Employment rate	96	57.1429	121	56.8075	90	54.5455	97	52.43243
Intellectual and Learning disability - Individuals served	2093	66.9332	2049	65.0476	1604	64.7035	1962	65.00994

Intellectual and Learning disability - Employment rate	1158	55.3273	1100	53.6847	747	46.5711	989	50.40775
Psychosocial and psychological-Individuals served	786	25.1359	792	25.1429	631	25.4538	774	25.64612
Psychosocial and psychological- Employment rate	426	13.6233	371	11.7778	269	10.8511	347	11.49768

Internal data for 2015 - 2018 further break down the types of disabilities served and reflects the following trends for consumer intake by cause and impairment code (individuals determined eligible or with a Trial Work Experience plan):

- High rates of service for individuals with mental impairments, including drug and alcohol addiction, which have remained stable over the past four years.
- An increase in individuals with ADHD, Autism Spectrum Disorder and Specific Learning Disabilities from SFY 2015 to SFY 2018.
- An increase in individuals who are deaf or hard of hearing from SFY 2015 to SFY 2018.
- Relatively low rates of service for individuals with spinal cord injury, respiratory impairments, stroke and traumatic brain injury, and neurological impairments.

By source of referral, in SFY 2018 SCVRD received the majority of referrals from self-referrals (23.81%), secondary educational institutions (15.94%), Department of Corrections and Department of Juvenile Justice (14.19%), and mental health providers (12.66%).

Individuals Served Analysis

Data shows that SCVRD serves individuals with psychosocial and psychological disabilities at a high rate (47.9% of all consumers in FFY 2017), but at a lower rate for consumers less than 25 (25.5% in FFY 2017). The relatively low percentage of individuals with visual impairments served is expected, as the South Carolina Commission for the Blind serves individuals with primary visual impairments. Services for individuals with intellectual disabilities have been an area of focus for SCVRD, and the percentage of consumers served with intellectual and learning disability reflect this (21.4% of all consumers and 64.7% of consumers aged less than 25 years). Strategies to improve outreach to individuals with physical disabilities have resulted in an increase in percentage served (22.4% in FFY 2015 and 25% in FFY 2017), although strategies are needed for outreach to individuals with physical disabilities such as spinal cord injury, traumatic brain injury and neurological impairment. For youth (age less than 25), individuals with intellectual and learning disabilities comprise the majority of consumers (64.7%). SCVRD will need to

formalize strategies for outreach for youth with physical disabilities (6.6%) and auditory and communicative disabilities (2.9%).

Employment Rate Analysis

The employment rate for all consumers was 41.9% in FFY 2015, 42.9% in FFY 2016, and 40.3% in FFY 2017. Employment rates were highest for consumers with visual, auditory and communicative, and physical disabilities. Lower rates of employment were evident for individuals with psychosocial and psychological disabilities. Internal data for SFY 2018 reflects highest success rates (proportion of all closures in competitive, integrated employment including individuals determined eligible but exited prior to Individualized Plan for Employment) for individuals who are deaf and hard of hearing (73%), "Other" impairments (65%), and physical impairments (56%). Lower rates of success were evident for individuals with spinal cord injury (33%), stroke and traumatic brain injury (40%) and drug and alcohol abuse (40%).

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

Referrals from the workforce development system reflect an opportunity for improvement, with 1.5% of referrals from SC Works and State Employment Agency (American Job Centers), and 0.6% of referrals from Adult Education. Data collection on co-enrollment in WIOA programs began 7-1-17. SCVRD reported 10.8% of participants enrolled in more than one core program for PY 2018/SFY 2019.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES

Under the Workforce Innovation and Opportunity Act (WIOA), provision of pre-employment transition services (Pre-ETS) is required for eligible and potentially eligible students with disabilities. WIOA further defines these as required and authorized activities (i.e., job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs, workplace readiness training, and instruction in self-advocacy as well as authorized activities that develop and improve strategies for delivering pre-employment transition services). The five required Pre-ETS align with the existing framework for school-to-work transition services that the South Carolina Vocational Rehabilitation Department (SCVRD) has employed for many years, based on the National Collaborative on Workforce and Disability for Youth's (NCWD/Y) Guideposts for Success evidence-based model. SCVRD initiated a renewed focus on services for students and youth with disabilities several years prior to the passage of WIOA. In addition to the dedicated resources and focus on services for this population, WIOA also outlines additional requirements.

Need for Pre-Employment Transition Services

SC Department of Education

State agencies, including both VR and Education agencies, in South Carolina are required to submit an annual Accountability Report. The 2016-17 Annual Accountability Report of the SC Department of Education (SCDE) indicated that the SCDE is in the process of developing a merged accountability system that blends state and federal requirements. The state has developed their Every Student Succeeds Act (ESSA) plan over the past two years, which was pending submission to the Department of Education at the time of the Accountability Report for 2016-17.

According to the SCDE Accountability Report Performance Measure Template, the percentage of schools complying with postsecondary transition goals and services of students with an Individualized Education Plan (IEP) was 95.3% for 2016 - 2017, with a goal of 95%.

According to the most recent school report card information from the SC Department of Education, in 2017 there were 27,306 students served under an IEP in public high schools in South Carolina. (SC Dept. of Education Report Cards, 2017)1.

IDEA Part B data – US Department of Education

In addition to state level reports, the Department of Education (the Department) provides an annual report to Congress on implementation of the Individuals with Disabilities Education Act (IDEA).2 IDEA part B refers to services provided for students with disabilities age six through 21. In South Carolina in 2014, 9% of the population ages six through 21 were served under IDEA, a decrease of 1.7% from 2008. The national rate was 8.8% in 2014. For South Carolina, the percentage of students by educational environment were as follows: 58.3% were in regular class 80% or more of day; 21.3% in regular class 40% - 79% of day; 17.8% in regular class less than 40% of day. This may have implications for SCVRD service delivery strategies within the schools.

The percentage of students age 14 - 21 exiting IDEA part B and school who graduated with regular high school diploma (all disabilities) in South Carolina was 45.7% in 2014, up from 40.4%% in 2004.

The dropout percentages for students age 14 -21 (all disabilities) in South Carolina were 40.5% in 2014 compared to 52.5% in 2004. South Carolina was one of three states in which more than 40% dropped out, which bears consideration for development of effective strategies to curb dropout rates and encourage engagement in pre-employment transition and other transition services. The percentage of students age 14 through 21 exiting IDEA part B for 2013-14 in South Carolina by exit reason were as follows:

Figure 9					
Students Age 14 – 21 Exiting IDEA Part B: 2013 – 2014, South Carolina					
Graduated with a regular diploma 26.9%					
Received a certificate	5.0%				
Dropped out	23.8%				
Reached maximum age	2.8%				
Died	0.2%				
Transferred to regular education	7.4%				
Moved, known to be continuing	33.9%				

According to the US Department of Education IDEA data, specific learning disability, speech or language impairment, and intellectual disability were the top three types of disabilities for students served under IDEA.

¹ 2017 SC Department of Education Report Cards retrieved from SC Dept. of Ed website, Data Files for Researchers, High School: Data Files for Researchers, High). SCDE Data Files for Researchers

² 38th Annual Report to Congress on the Implementation of the Individuals with Disabilities Act, 2016. 2016 Annual Report to Congress on the Implementation of IDEA

Students Ages 6 to 21 Served under IDEA, Part B: South Carolina

Figure 10	
Diagnostic Category	Fall 2015
All Disabilities	92,344
Specific Learning Disability	41,809
Speech or Language Impairment	14,595
Intellectual Disability	6,446
Emotional Disturbance	2,418
Multiple Disability	1,186
Hearing Impairment	971
Orthopedic Impairment	486
Other Health Impairment	12,994
Visual Impairment	400
Autism	6,460
Deaf Blindness	12
Traumatic Brain Injury	188
Developmental Delay	4,379

Source: 2017 Annual Disability Statistics Compendium

Students and Youth with Disabilities in SCVRD

Data from the 2015 RSA 911 data file for SCVRD was reviewed. This shows that 24.6% of cases closed were age 21 or younger at application (n=3939). For individuals that were 21 or younger, 2,370 were coded as a student with a disability at application, representing 14.8% of all closures. Four hundred individuals (2.5% of closures) that were younger than 19 were not coded as a student with a disability in secondary education at application, and could be considered to represent individuals that had dropped out of school.

Types of closures were compared based on these categories: transition students (21 or younger and student in secondary education), dropouts (younger than 19 and not a student in secondary education) and adults/other. The rate of employment outcomes were lower for dropouts (35.8%) than for transition students (42.2%) and adults/other (42%). The adjusted rehabilitation rates were also lower for transition students and dropouts.

Figure 11 Consumer category			Closed eligible, No before IPE or determined Preservice eligible with IPE		Employment outcome	Adjusted Rehab Rate
Transition Student	2,370	7.6%	9.4%	40.8%	42.2%	50.9%
Dropout	400	12.0%	22.0%	30.3%	35.8%	54.2%
Adults or Other	13,232	14.2%	18.6%	25.2%	42.0%	62.6%
Total	16,002	13.1%	17.3%	27.6%	41.9%	60.3%

Primary disability impairment and cause data were also evaluated. This shows that the highest primary impairment was cognitive impairments for transition students (79.1%) and dropouts (46.8%). The second highest was psychosocial impairments for both groups (8.2% for transition students and 21.5% for dropouts). In terms of primary disability cause, the highest for transition students was specific learning disabilities (48.6%) followed by intellectual disability (14.5%). For dropouts, both attention-deficit hyperactivity disorders and specific learning disabilities were highest (19% for both), with depressive and mood disorders next (9.8%).

Pre-ETS are delivered by SCVRD primarily through dedicated school-to-work transition counselors and transition coaches. There are transition counselors assigned to every public high school in the state, including at the state Department of Juvenile Justice facility. Counselors work collaboratively with local education agency staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized and group Pre-ETS are provided. These services are made available to all students, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists and school job coaches to ensure that students with many different types of disabilities are made aware of the available Pre-ETS. This includes students with IEPs, students with 504 plans, and students with disabilities that may not have either but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and supports that are more intensive are identified and referred to appropriate staff for provision of Pre-ETS. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's work training centers located throughout the state. In many locations, schools transport students to the work training centers during the school day. This training provides a foundation from which students can move on to community based work experiences, internships, and other job exploration and work readiness training activities.

Transition counselors present information on Pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student post-secondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the state level, while also serving as a bridge to local communities. Through

their support, 61 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of Pre-ETS.

It is clear that there are opportunities for improvement in achievement of outcomes for school to work transition services. Given the array of stakeholders involved in the provision of Pre-ETS and other services for students and youth, it is important to seek periodic feedback from individuals involved in the provision of services to students about the current observation and for improved services and outcomes.

LEA Partner Survey

Expanding the data gathered from school-to-work transition stakeholders was a focus of this CSNA. This was achieved by developing and deploying a survey of LEA staff to obtain information on the level of knowledge of VR Pre-ETS, views on the working relationships with SCVRD transition staff, input on the effectiveness of VR transition services, and recommendations for improvement of transition services provided by SCVRD.

Methods

A survey was designed and deployed through the TASC transition listserv to obtain data on the current views of LEA staff. The survey request was sent via email as well as in a follow up link included in the TASC newsletter. The survey asked LEA staff to respond to questions regarding their familiarity with roles and responsibilities of VR staff, compared to school staff. It also asked for responses regarding familiarity with Pre-ETS, coordination of transition activities between VR and school staff, effectiveness of the working relationship between LEA and VR staff, typical age of referral to VR, effectiveness and level of availability of Pre-ETS in the district or community.

The survey used for this project was developed based on input from SCVRD staff, including transition coordinator and specialist staff, as well as individuals with expertise in survey research and design. Qualitative and quantitative data points were included. The survey instrument included scaled questions (strongly agree, agree, disagree, strongly disagree) to address familiarity with roles and responsibilities of VR staff, coordination of Pre-ETS provided by VR with school transition curriculum, and effectiveness of working relationships. Questions were also designed to obtain responses on age of referral to VR, frequency of meetings with VR staff, which services were felt to be most effective in preparing students, and the level of availability of services. Open-ended questions were included to identify barriers to collaboration on transition services and recommended improvements to strengthen transition services.

The survey was distributed in electronic format via a listserv that includes a subscriber total of 1,349. This transition listserv includes a diverse group of stakeholders that are involved in school-to-work transition. The request for survey participation was sent via email and identified as a Survey for LEA Partners, a group that represent a subset of the entire subscriber total. After the initial email notification, an additional notice was included in the quarterly TASC transition newsletter approximately one month later. The survey remained open for a total of 2 months before results were compiled.

There were 25 respondents to the LEA survey, out of 1,329 subscribers on the transition listsery. Not all subscribers on the listserv would have been LEA staff. The respondents to the survey identified their respective school districts as well as their role within the LEA. There were 20 different school districts represented in the survey responses - out of the 81 school districts in South Carolina at the time of the survey that represents a 24.6% response rate. The districts represented all regions within the state, and included a mixture of large, urban districts as well as small, rural districts. The districts included: Richland One, Chesterfield County, Lexington-Richland Five, Various Schools in Charleston/Dorchester/Williamsburg/Berkeley/Orangeburg Counties, Berkeley, Spartanburg Greenville County, Richland Two, Bamberg One, Calhoun County, Greenwood Fifty, Kershaw County,

Spartanburg Six, Allendale, Dorchester Two, Spartanburg 1-7, Lexington Four, and Edgefield County. Five districts had multiple respondents.

Results from the survey were analyzed and grouped by theme. Strategies to address unmet needs or to replicate effective practices were identified as part of the final report.

Results

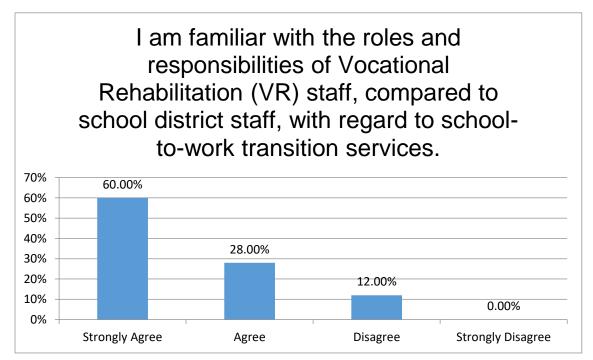
Figure 12		
Participants		
Role of Participants	Freq.	Perc.
Leadership (superintendent, assistant superintendent, principal, assistant principal)	4	16%
Direct Provider (teacher, teacher aide, job coach)	9	36%
Transition Coordinator/Specialist	6	24%
Other	6	24%

Among the "Other" category, this included responses from

Independent Living Center staff that provide skills workshops in the schools, compliance specialist, disability board member providing long-term support service, VR counselor, and transition teacher. All 25 respondents answered all of the following questions.

Analysis of Quantitative Data

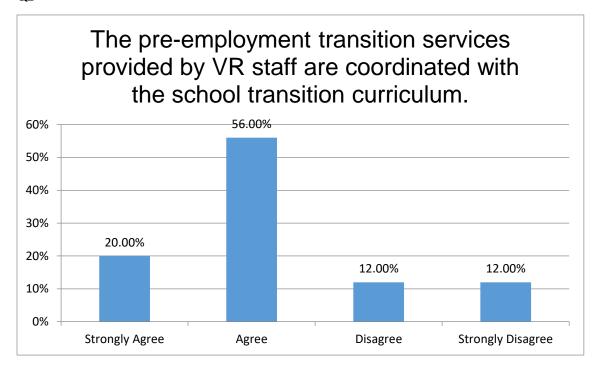
Q1



The survey results indicate a high level of familiarity with roles and responsibilities of VR staff with regard to school-to-work transition services (88% either strongly agree or agree that they are familiar). An additional question indicated a high rate of familiarity with pre-employment transition services (84% either

strongly agree or agree), which is of critical importance given the mandates for provision of Pre-ETS contained within the Workforce Innovation and Opportunity Act (WIOA). This indicates that communication at the local level is occurring.

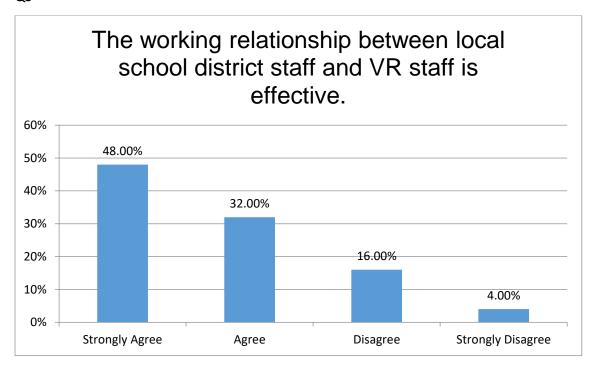
Q2



Responses regarding the coordination of pre-employment transition services with school transition curricula were mixed, with 76% strongly agreeing or agreeing that services are coordinated. A fourth (24%) of the respondents either disagreed or strongly disagreed, indicating the opportunity for improving the coordination of VR transition services with that provided by the schools.

Cross tabulation for Q2 by staff role revealed that the role with the highest total "agree" responses were LEA direct providers (teacher, teacher aide, job coach employed by school).

Count of Respondent ID	Q2				
Staff Role	Agree	Disagree	Strongly Agree	Strongly Disagree	Grand Total
LEA direct provider	5	1	1	2	9
LEA leadership	3		1		4
Other (please specify)	3		2	1	6
Transition coordinator/specialist	3	2	1		6
Grand Total	14	3	5	3	25



Working relationships and communication were themes that emerged in both the quantitative data as well as the qualitative data. Overall, the majority of respondents indicated that the working relationship between LEA staff and VR staff is effective (80%). Cross tabulation of the responses for Q1 and Q3 indicated that of the respondents that selected "strongly agree" for Q1, ten of those also selected "strongly agree" for Q3.

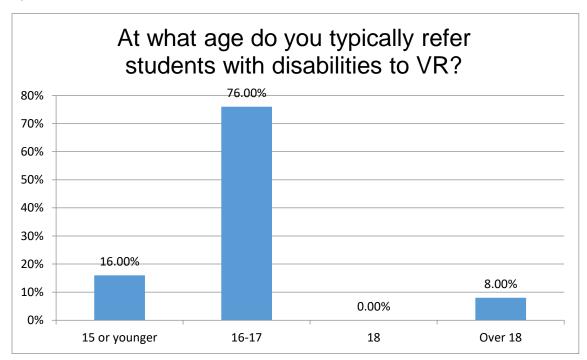
Count of Respondent ID	Q3				
Q1	Agree	Disagree	Strongly Agree	Strongly Disagree	Grand Total
Agree	3	1	2	1	7
Disagree	1	2			3
Strongly Agree	4	1	10		15
Grand Total	8	4	12	1	25

Cross tabulation of Q2 and Q3 revealed that of the respondents that selected "agree" for Q2, 12 selected either "agree" or "strongly agree" for Q3.

Count of Respondent ID	Q3				
Q2	Agree	Disagree	Strongly Agree	Strongly Disagree	Grand Total
Agree	5	2	7		14
Disagree	3				3

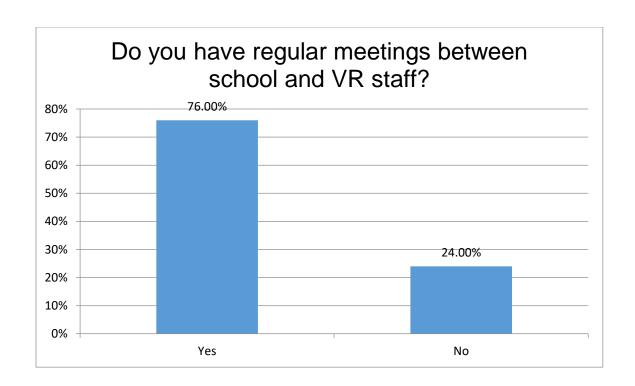
Strongly Agree			5		5
Strongly Disagree		2		1	3
Grand Total	8	4	12	1	25

Q4

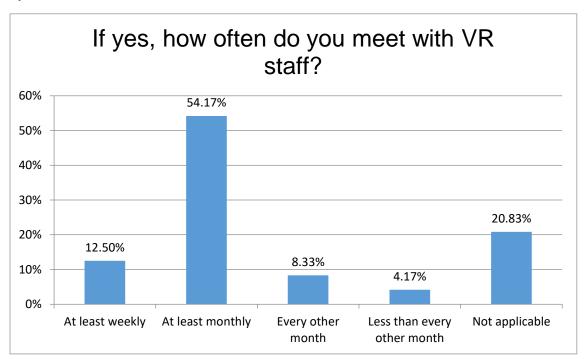


Age of referral to VR was a component explored in the survey. Results indicated that the majority of partners typically refer students to VR at age 16-17 (76%). This is in keeping with VR practices that encourage referrals prior to the last year of high school. There were two respondents that indicated referrals are typically made when students are over 18, and four respondents that indicated that they typically refer students at age 15 or younger. Appropriate timing of referrals based on the individualized needs of the student is central to the ability of staff to provide effective and comprehensive transition services prior to the student's exit from high school. What is not visible in the survey results is the impact that the student's track may have on age of referral. For example, students on diploma track may benefit from referral for individualized VR services at age 16 if they are on course to graduate at age 18, but students on non-diploma track that may plan on utilizing additional years in secondary school may not anticipate graduation until age 21.

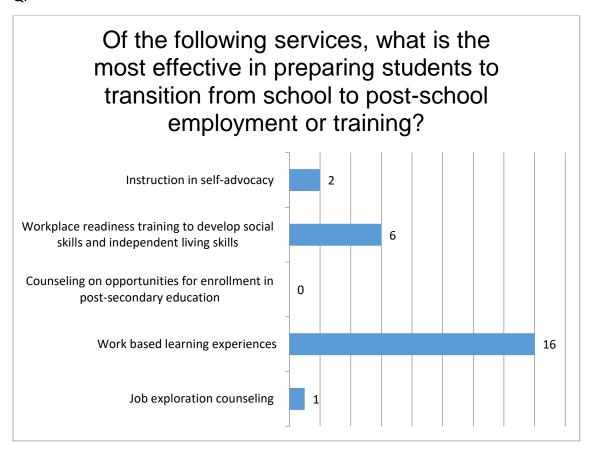
Q5



Q6

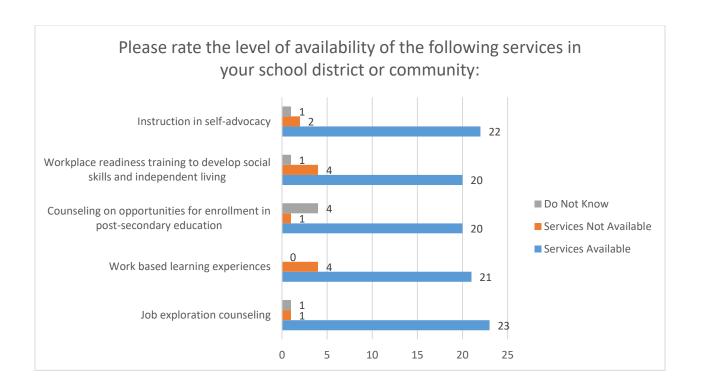


Questions related to frequency of meetings between LEA and VR staff showed a range of responses. Seventy-six percent of respondents (19) indicated that they did have regular meetings, and of those that had regular meetings, 54% indicated that they met at least once a month. There were five respondents that indicated "no" to question five, and went on to answer question 6 as "not applicable." Review of the themes that emerged from the qualitative survey data indicates that communication and availability of staff were major issues with regard to barriers to coordination on transition services and recommendations to strengthen school-to-work transition services.

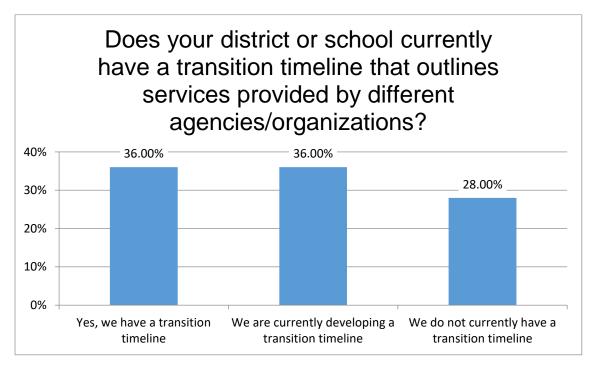


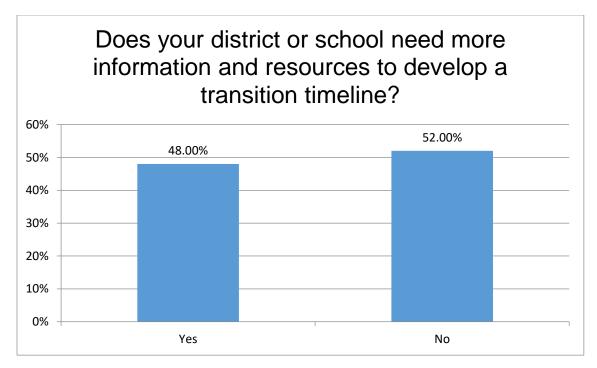
Respondents were asked which of the pre-employment transition services was most effective in preparing students. Most revealed that work-based learning is the most effective and relevant service related to employment outcomes according to respondents. This points to the need to develop capacity for providing work-based learning opportunities.

Q8



With regard to availability of services, the majority of responses indicated that the five pre-employment transition services were available.





The intent of WIOA Pre-ETS is to ensure that all students with disabilities have access to preparatory activities while in high school. Questions related to the development of transition timelines indicate that most areas either have or are developing this, which can be an important tool in facilitating timely referrals to VR. The respondents that indicated that they do not have a transition timeline and are in need of information and resources to develop one can be targeted for assistance.

Analysis of Qualitative Data

The participants were asked to provide their opinions on three aspects in relation to transition services: barriers to collaboration on transition services, improvements to strengthen transition services, and any other recommendations to enhance VR services for students with disabilities. Each comment was reviewed and assigned to one or more themes.

- What are barriers to collaboration on transition services?
 - o Coordination/communication (24%)
 - o Time and availability of partners (20%)
 - o Responses related to curriculum (13%)

A considerable proportion of participants identified coordination/communication (24%), time and availability of partners (20%), and curriculum-centered responses (13%) as barriers to collaboration. Coordination/communication included items such as working with multiple VR offices and staff, lack of communication between district-level staff and teachers, and not knowing what staff in different programs have discussed with students and parents about career goals and planning. Time and availability of partners included examples such as difficulties getting all agencies to meet on a regular basis, not having follow through from all parties, and getting past time constraints and multiple responsibilities. Curriculum centered responses included items such as need for increased opportunities for students to develop skills outside the school environment, differences in policies and procedures among agencies, and the need for hard skill training. Other barriers raised by a relatively small number of participants included administrative support, parental involvement, transportation, and funding/resources.

- Improvements to strengthen transition services
 - o Coordination/communication
 - o Curriculum
 - Access to services
 - o Funding/resources
 - o Parental involvement

Recommendations for improvement included the greatest proportion of responses related to coordination/communication (24%) and curriculum (18%). There were multiple thematic topics raised by a smaller number of respondents including the following: access to services, funding/resources, parental involvement, time/availability of partners, and transportation. When asked if there were any other recommendations, the top two themes were related to coordination/communication (33%) and curriculum (15%). Other responses included access to services, community involvement, and time/availability.

Discussion

Respondents to the survey represented a wide variety of districts and roles across the state. Given the array of locations, it is feasible to generalize the results across multiple types of school districts. However, the sample size of 25 makes it difficult to generalize results to the different roles in LEAs.

Results of the survey indicate that there is good understanding of VR roles in the provision of school-to-work transition services and those services are widely available. Areas identified throughout the responses as having the potential for improvement include a focus on intentional communication and coordination with LEA partners, identifying time to be available for those activities that support active engagement and a collaborative, established curriculum that enhances work-based learning experiences and experiences that build skills outside of the school environment. These findings will be utilized to enhance the provision of well-coordinated and effective Pre-ETS.

The intent of WIOA Pre-ETS is to ensure that all students with disabilities are well prepared for further education/training or employment. Coordination among education and service provider entities has long been an expectation to support students with disabilities in achieving optimal postsecondary outcomes. Results of this study highlight areas that appear to be positively impacted by WIOA, as well as areas that remain opportunities for improvement. Updated data collection requirements under WIOA will allow for a more comprehensive view of services in the future to be provided to students, both VR clients and potentially eligible students that are receiving pre-employment transition services.

Fiscal forecasting

A study by Honeycutt et. al (2015)³ used data from the RSA-911 and other sources to identify a cohort of individuals that applied for VR services between 2004 and 2006. On average, 8% of youth with disabilities aged 16 to 24 applied for VR services, with this ranging from 4% to 14%. Fifty-six percent of transition-age youth who applied for services received them, with this parameter ranging from 31% to 82%. The potential

 $^{^3}$ Honeycutt, T., Thompkins, A., Bardos, M., & Stern, S. (2015). State differences in the vocational rehabilitation experiences of transition-age youth with disabilities. Journal of Vocational Rehabilitation, 42(1), 17 – 30.

impact from a state being on an order of selection was noted. In terms of employment, 56% were employed at time of case closure. South Carolina was on the higher end of the summary statistic (seventh highest).

Any reserved funds remaining, beyond the required amount necessary to reserve for the provision of Pre-ETS "required services" to all students with disabilities in need of such services, may be used for authorized activities. The following section outlines the methodology used to determine the targeted amount necessary for provision of required Pre-ETS, allowing SCVRD to utilize reserved funds for authorized activities. The data on the number of potential individuals eligible for Pre-ETS as well as targeted amounts of reserved funds necessary for ensuring the "required activities" under Pre-ETS are provided to students with disabilities are outlined.

- I. Determine the number of students with disabilities in the State that includes students eligible for the VR program as well as those "potentially eligible". Identify the source of this information.
 - o In South Carolina, the age range for providing transition services under IDEA is 13 to 21.
 - o There are 27,306 students in public high schools in SC that are identified as students with disabilities (students that have an IEP).
 - Source: 2017 SC Dept. of Education Report Cards, retrieved from SC Dept. of Ed website, Data Files for Researchers, High School: Data Files for Researchers, High
 - Although school reports cards for 2018-2019 are available, the format and content has been changed and no longer includes enrollment of students with an IEP.
 - o To date, VR has been unable to obtain State totals on students with 504 plans. VR provided the State Department of Education with a formal request for the information, which was declined. Efforts to obtain this data will continue.
 - o In 2017, there were an estimated 19,600 individuals aged 16 to 20 that reported having a disability.
 - Source: American Community Survey, 2017, retrieved from Cornell University Disability Statistics website www.disabilitystatistics.org
- II. Determine the number of students with disabilities in the State that need Pre-ETS required and coordination activities, including those currently receiving such services.
 - To identify the need for Pre-ETS, data demonstrating the prevalence of disability among non-institutionalized people age 16 to 20 was gathered. In 2013, this total was 20,800. In 2015, this total was 23,105. In 2017, this total was 19,600. Data on the types of disability experienced by students served under IDEA was evaluated. This demonstrated that specific learning disability, speech or language impairment, and intellectual disability were the top three types of disabilities for students served under IDEA. In addition, data on the prevalence of autism for students and youth with disabilities (age 16 to 25) reflected this to represent an emerging disability. The CSNA also identified youth with most significant disabilities, including those with intellectual disability and multiple disabilities, as an emerging population requiring VR services. Prevalence data was considered along with school district information on the number of students enrolled in high school that were receiving special education services (27,306) in estimating the number of students in the state that were eligible or potentially eligible for VR services. Based on all available data, the school district total (27,306) was determined to be the most accurate figure to be used in estimates.

- o Based upon verifiable VR agency data over a three-year period (SFY 2017 SFY 2019), on average, 73.30% of the students with disabilities that were offered required Pre-ETS activities did not accept such services. The number of students used to calculate the cost in step III for provision of Pre-ETS is therefore reduced by that percentage, reflecting 7,291 students that are projected to accept and receive services.
 - SFY 2016: 21,931 students who were offered Pre-ETS opted not to receive services (80.31% of total students); 5,375 accepted and received Pre-ETS.
 - SFY 2017: 21,537 students who were offered Pre-ETS opted not to receive services (78.87% of total students); 5,769 accepted and received Pre-ETS.
 - SFY 2018: 21,766 students who were offered Pre-ETS opted not to receive services (79.71% of total students); 5,540 accepted and received Pre-ETS.
 - SFY 2019: 16,746 students who were offered Pre-ETS opted not to receive services (61.33% of total students); 10,560 accepted and received Pre-ETS
- A four-year average of students who were offered Pre-ETS activities but who did not accept such services was also evaluated; however, it was felt that the most recent three year term provided a more accurate reflection of the current status of Pre-ETS and the growth in students accepting and receiving Pre-ETS activities.
- o Demonstrate that the required services have been made available to all that need them.
 - Pre-ETS are delivered primarily through dedicated school-to-work transition counselors and pre-employment transition specialists. There are transition counselors assigned to every public high school in the State, including at the State Department of Juvenile Justice facility. Counselors work collaboratively with local educational agency (LEA) staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized and group Pre-ETS are provided to students with disabilities. These services are made available to all students with disabilities, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists, school job coaches, school-based mental health counselors, career specialists and administrators to ensure that students with many different types of disabilities are made aware of the availability of Pre-ETS. This includes students with IEPs, students with 504 plans, and students with disabilities who do not have an IEP or 504 plan but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and more intensive supports are identified and referred to the VR youth job coach. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's work training centers located throughout the State. In many locations, schools transport students to the work training centers during the school day. These work-based learning services provide a foundation from which students can move on to community based work experiences, internships, and other job exploration and work readiness training activities.
 - Transition counselors present information on Pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource

fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student post-secondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the State level, while also serving as a bridge to local communities. Through their support, 61 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of Pre-ETS.

- Information on Pre-ETS and transition services for students with disabilities is located on the SCVRD website (scvrd.net).
- SCVRD does not currently utilize any Third Party Cooperative Agreements (TPCA) for provision of Pre-ETS.
- III. Calculate the cost for the provision of Pre-ETS required and pre-employment transition coordination activities.
 - o In SFY 2016, SCVRD estimates it provided services to 5,375 students with disabilities at an average cost per student of \$1,338.
 - Costs for Pre-ETS on SF-425 reports during SFY 2016 were \$7,195,457.
 - o In SFY 2017, SCVRD estimates it provided services to 5,769 students with disabilities at an average cost per student of \$1,245.
 - Costs for Pre-ETS on SF-425 reports during SFY 2017 were \$7,187,450.
 - o In SFY 2018, SCVRD provided Pre-ETS to 5,540 students.
 - Costs for Pre-ETS on SF425 reports during SFY 2018 were \$7,669,190.
 - Average cost per student \$1,384
 - o In SFY 2019, SCVRD provided Pre-ETS to 10,560 students
 - Costs for Pre-ETS on SFY425 reports during SFY 2019 were \$7,316,973.
 - Average cost per student \$693
 - o For SFY 2016 2019, the average cost per student for Pre-ETS was \$1078 per year. This is based on the aggregate total of Pre-ETS costs divided by the aggregate total of students served (\$29,369,070 divided by 27,244).
- IV. Calculate the amount of funds reserved for the provision of Pre-ETS that must be set aside for the provision of Pre-ETS required and pre-employment transition coordination activities.
 - o Multiplying the number of eligible or potentially eligible students projected to accept and receive Pre-ETS by the projected cost per student (7,291 at \$1078 per student), which takes into account students who will access and receive Pre-ETS through comparable benefit, and those students with disabilities who will opt not to access or receive Pre-ETS, it is anticipated that we will require \$7,859,698 for providing required and pre-employment transition coordination activities under Pre-ETS.
 - o The cost of pre-employment transition coordination activities was tracked separately beginning in SFY 2018 and is included in the average cost per student served.

- Calculate whether the agency's VR funds required to be reserved for the provision of Pre-ETS are sufficient to make Pre-ETS required and pre-employment transition coordination activities available to all students with disabilities needing such services.
 - o For FFY 2017, 15 percent of the total Federal allotment for the Pre-ETS set aside amount was \$8,395,536. Based on fiscal forecasting, \$7,151,760 was projected for required and pre-employment transition coordination activities, leaving \$1,243,776 available for authorized activities.
 - o For FFY 2018, 15 percent of the total Federal allotment is \$8,995,567. Based on fiscal forecasting, \$7,348,723 is required to be set aside for Pre-ETS required and pre-employment transition coordination activities. The remainder (\$1,646,844) is what SCVRD has to spend on authorized activities (FFY 2018 allotment).

For FFY 2019, 15 percent of the total Federal allotment is \$8,731,232. Based on fiscal forecasting, \$7,859,698 is required to be set aside for Pre-ETS required and coordination activities, leaving \$871,534 available for authorized activities.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE;

Based on the findings in the most recent CSNA noted in section j.1.A., B., C., D., and E, the network of SCVRD area offices, work training centers and comprehensive programs across the state ensure statewide delivery of VR services to all populations in need of VR services.

SCVRD is unique among public VR programs in that it owns and operates its own Community Rehabilitation Programs (CRPs). The bulk of direct consumer services are delivered by SCVRD staff through its network of area offices, staff located at itinerant sites, and job readiness training centers (work training centers). Because of the service delivery structure established by SCVRD, there are needs related to the ongoing operation of its CRPs (area offices, work training centers, and comprehensive programs).

In response to the WIOA mandates for provision of Pre-Employment Transition Services (Pre-ETS), SCVRD is expanding its approach to service delivery for students through contractual and pilot programs to ensure that all statutory and regulatory requirements are met, and that Pre-ETS are made available to all eligible and potentially eligible students that are interested in receiving those services.

Area Office Capital Projects – SFY 2020 - 2024

The state of South Carolina requires that agencies submit for approval a five-year Comprehensive Permanent Improvement Plan (CPIP). This forms the basis for identifying needs for routine maintenance such as roofs and building repair. It also includes projects that are necessary to extend the life or expand use of existing structures, which were included in our most recent CSNA to establish the need for those projects.

Parking Lot Repair

The following SCVRD area office locations have repaving projects identified in the CPIP for SFY 2020 - 2024:

Anderson: Repair and resurface the existing parking lot and loading area. Subsurface investigations will be required to determine the level of deterioration of the existing paved areas. Exterior lighting will also be added to the parking areas for increased safety and security. The existing paved areas have deteriorated and are in need of repair and resurfacing, since the facility is over 31 years old.

Marlboro: Repair and resurface the existing parking lot and loading area. This facility is over 26 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will

be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

Conway: Repair and resurface the existing parking lot and loading area. This facility is over 40 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

Lexington: Repair and resurface the existing parking lot and loading area. This facility is over 37 years old, and the parking lot and loading areas are in need of repair and resurfacing. Subsurface investigations will be required to determine the depth and extent of deterioration of the existing paving prior to resurfacing. Exterior lighting will also be added to the parking areas for increased safety and security.

Other CPIP Projects - SFY 2020 - 2024

At its offices and work training centers throughout the state, SCVRD has 77 HVAC systems that are more than 15 years old. All of these units use HCFC-22 or R142b refrigerants, which will no longer be produced or imported after 2020, and will be available only through stockpiled quantities. SCVRD will work with the State Energy Office in assessing all aging HVAC units and developing plans for replacement or repair. Replacement will also assist the agency in achieving the State Energy Office's required 20% reduction in energy usage by 2020.

There is a need to replace an existing cooling tower due to wear on existing equipment in the SCVRD state office located in West Columbia.

Oconee Pickens – Seneca office expansion

Some years ago, the need to expand the SCVRD area office and work training center located in Seneca (referred to internally as the Oconee Pickens office) was identified. As stated earlier in the CSNA, Oconee and Pickens counties are largely rural counties that are situated within the Upstate region of the state. That region has experienced extensive growth in many industries such as advanced manufacturing and health care. In combination with interest from employers and legislators, the Oconee Pickens office has been identified as a site needing additional capacity (space) for service delivery staff. In response to WIOA as well as local and regional economic and workforce development needs, it has also been identified as a location requiring expansion of its work training center facility to provide customized and demand-driven training opportunities for consumers. With expansion of the work training center, there will be development of customized and demand-driven trainings that meet the needs of business and industry that have previously been limited due to space. Support for state funding for the project demonstrates the need and interest of the community.

With the expansion of the work training center, acquisition of additional business contracts in advanced manufacturing techniques are subassembly are anticipated. Examples of current contracts include Electrolux - fan assembly; Greenfield Industries - drill bit quality control, sorting, and packaging; Ulbrich – medical spool quality control and sorting; Parkway Products – door fuel inlet automotive assembly; and Schneider Electric – Trip Switches sub assembly.

The purpose of these contracts is to provide job readiness training and skills enhancements for SCVRD consumers that, in turn, meets the needs of employers in the community. It will also allow us a greater ability to work with our business partners on the development of demand driven and customized trainings. One of the strategies included in the SC WIOA state plan is sector partnerships, which are industry-led coalitions focused on a specific employment sector. In the Greater Upstate region, the manufacturing sector partnership has identified an action team to address gaps in middle-skill technical jobs. Capacity for demand-driven and customized trainings that are informed by this industry group will be

available through these additional contracts with business. Eligible SCVRD consumers who have been identified on their IPE as needing job readiness training and vocational training in manufacturing will be training on these contracts (job readiness training).

The additional contracts are anticipated to generate approximately \$8640 per month in program income. In accordance with CFR 361.63, program income earned will be used to supplement Federal funds that support SCVRD's program activities.

Per the project plan submitted to the State, the following is a summary of the project:

Design and construct an 8200 square foot addition and 1407 square foot renovation to the existing Work Training Center and production space, clean work room, offices, and storage. This addition will be utilized for additional contract work space used to provide consumers with job readiness training.

Replace the roof of the Oconee/Pickens VR Center Building, consisting of approximately 20,000 square feet of roof deck. Remove approximately 20,000 square feet of existing built up roof. Apply roof insulation and SBS smooth granular surfaced modified bitumen roofing system with associated flashings and metalwork. New roofing system to have a 20-year warranty. Removal and disposal of asbestos containing roofing and flashing materials may be required.

The roof is approximately 29 years old and has exceeded its life expectancy. The addition is needed to increase capacity to serve the growing consumer population in this region, as well as to increase the types of contract work necessary to train our consumers for competitive employment.

SCVRD has historically operated two substance abuse treatment facilities in the state, Holmesview Center in Greenville and Palmetto Center in Florence. Holmesview Center was destroyed in a fire in November of 2016. Plans for rebuilding that Center are currently going through state procedures. Due to aging infrastructure and safety concerns, the Palmetto Center was rebuilt, and the new facility is in the final stages of state approval. The need for these existing programs has long been established.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

Section (E) of the Statewide Needs Assessment outlines current data on prevalence of disability for youth and students with disabilities in South Carolina. It also describes recent totals of students served under IDEA Part B, the types of disabilities experienced and current totals of students in high school with an IEP. Additionally, information in section (E) of the Statewide Needs Assessment identifies the gap in graduation rates for students with disabilities, highlighting the need for effective transition career services and Pre-Employment Transition Services.

To meet the needs of students and youth with disabilities, SCVRD coordinates with school districts, partner organizations and service providers to complement and support a wide range of school-to-work transition services, including Pre-Employment Transition Services.

During SFY 2015, SCVRD received 4,451 transition-aged referrals (age 14 to 24 at application). During the year, 8,988 transition-aged youth were active consumers with many of them still in high school or college. 1,966 transition-aged youth had successful employment outcomes during SFY 2015, which continues the upward trend that has occurred since SFY 2013 (48 percent increase).

As Pre-Employment Transition Services to students with disabilities expanded, SCVRD increased the number of students and youth referred and receiving services. In SFY 2017, 4,854 transition-aged youth

were referred for services. This included 2,493 students with disabilities who were referred by the school system. A total of 8,523 students who were referred by the school system were active in the VR system during the year. Employment outcomes remained stable, with 1,888 successful employment outcomes for transition-aged youth, 1,052 of whom were referred by the school system.

Based on the past three years' data on services for students and youth, SCVRD estimates it will provide services, including but not limited to Pre-Employment Transition Services, to approximately 8,480 individuals who are initially referred by the school system.

Data collection for the new 911 Case Services Report will allow for better identification of students with disabilities and provision of Pre-Employment Transition Services. As the new data becomes available, projections and fiscal forecasting for the provision of Pre-Employment Transition Services will be updated.

Pre-ETS are delivered primarily through dedicated school-to-work transition counselors, school partners and three independent living centers. There are transition counselors assigned to every public high school in the state, including at the state Department of Juvenile Justice facility. Counselors work collaboratively with local education agency staff to identify students with disabilities. They are located on-site in the high schools and establish a schedule through which individualized, and group Pre-Employment Transition Services are provided. These services are made available to all students, including potentially eligible students. VR transition counselors enlist the assistance of teachers, guidance counselors, school nurses, school transition coordinators/specialists and school job coaches to ensure that students with many different types of disabilities are made aware of the available pre-ETS services. This includes students with IEPs, students with 504 plans, and students with disabilities who may not have either but would meet the requirements to have a 504 plan. Students with most significant disabilities who require supported employment services and more intensive supports are identified and referred to the transition coach for provision of Pre-Employment Transition Services. Workplace readiness training and work-based learning experiences are provided both in the schools and in the community, as well as through SCVRD's job readiness training centers located throughout the state. In many locations, schools transport students to the job readiness training centers during the school day. This training provides a foundation from which students can move on to community-based work experiences, internships, and other job exploration and work readiness training activities.

Transition counselors present information on pre-ETS at teacher trainings and administrative meetings, school assemblies, parent night events, and resource fairs. In addition, The Transition Alliance of South Carolina (TASC) is an interagency collaborative whose mission is to increase successful student postsecondary transition outcomes through active interagency collaboration. Their efforts help build capacity for transition programming at the state level, while also serving as a bridge to local communities. Through their support, 59 local interagency transition teams have been established. These teams are another avenue for making stakeholders aware of the availability of pre-ETS.

Information on pre-ETS and transition services for youth is located on the SCVRD website.

TASC is a robust state-level interagency collaborative that works in support of increasing positive postsecondary outcomes for students with disabilities. It has multiple stakeholder agencies and organizations, and supports local level interagency teams through training, technical assistance, and strategic planning.

The department continues to coordinate the development of designated staff with emerging initiatives by the SCDE and the 81 local school districts (LEAs) under IDEA and state school-to-work transition efforts. Transition training efforts this year included the following: a two-day transition summer series was conducted for transition staff that included interactive activities and presentations on effective delivery of Pre-Employment Transition Services. Over 40 transition staff participated in an annual interagency

transition conference, focused on local interagency planning and content sessions focused on effective service delivery for students with disabilities. Youth leaders also participated in the conference. Disability-specific modules on learning disabilities, intellectual disabilities and autism spectrum disorders are available for all staff via LOTIS, the agency's online training site. In addition to the disability-specific training modules, a module on transition basics, with a focus on evidence-based practices and quality service delivery, has been developed and is delivered in person to all SCVRD transition personnel. This has become the standard training for all new staff working with transition students.

The TSS collaborative approach to the provision of transition services was continued this year and was expanded to 20 schools. This approach designates a transition services specialist – who is a school district employee – to provide Pre-ETS and to act as a liaison to refer students to the department and assist these students in participating in transition activities and work-based experiences in the community. This outreach effort has improved access to VR services for students with disabilities in the areas in which the program is operating and has increased our collaborative efforts with the local school district.

The department continues to designate a liaison counselor who provides Pre-Employment Transition Services to each public secondary school throughout the state. During this past year state office and local staff have provided in-service training to school staff, parents, and students regarding service availability. Also, cooperative agreements with DJJ and the Will Lou Gray Opportunity School afford the ability to work collaboratively to serve at-risk youth prior to their exit from high school.

- (k) Annual Estimates. Describe:
 - (1) The number of individuals in the State who are eligible for services.

Number of individuals in the state eligible for SCVRD services = 30,866.

- (2) The number of eligible individuals who will receive services under:
 - (A) The VR Program;

Title I, Part B (RSA 113 A15+C1+C2 round to nearest 1000) = 31,000. (SCVRD)

(B) The Supported Employment Program; and

Title VI, Part B = 249. (SCVRD)

(C) each priority category, if under an order of selection.

SCVRD is not under an order of selection.

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

SCVRD is not under an order of selection.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

\$32,979,396 (SCVRD)

- (I) State Goals and Priorities. The designated State unit must:
 - (1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.
 - (2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

- (3) Ensure that the goals and priorities are based on an analysis of the following areas:
 - (A) the most recent comprehensive statewide assessment, including any updates;
 - (B) the State's performance under the performance accountability measures of section 116 of WIOA; and
 - (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

SCVRD is an independent commission.

The SCVRD Strategic Planning Template below outlines the goals, strategies and measures developed for the agency. These goals were established based on the findings of the most recent comprehensive statewide needs assessment, as well as the state's performance under the performance accountability measures of section 116 of WIOA and other agency performance data and reports. These goals, strategies and measures are updated annually in conjunction with the agency's strategic planning efforts as well as state-specific reporting requirements. Each goal is tied to a defined strategy and set of measures, designed to be specific, measurable, attainable, relevant/realistic, and timely. These are long-term planning goals, strategies, and measures that include, at minimum, annual assessment of results as well as adjustment and revision based on the needs of the state and further implementation of WIOA.

STRATEGIC PLANNING TEMPLATE

Туре	Goal	Strategy	Measure	Associated Enterprise Objective	Description
G	1			Education, Training, and	Successful employment outcomes for South Carolinians with disabilities through specialized, individualized services
S		1.1			Improve the quality of employment outcomes for eligible individuals with disabilities.
М			1.1.1		Percentage of program participants who are employed during 2nd quarter after exit
M			1.1.2		Percentage of program participants who are employed during 4th quarter after exit
М			1.1.3		Percentage of program participants obtaining recognized post-secondary credential or a secondary school diploma during participation or within one year of exit
S		1.2			Enhance school-to-work transition services.
М			1.2.1		Number of students receiving Pre- Employment Transition Services as specified by WIOA

М			1.2.2		Percentage of individuals served by agency
					who are in transition age range (14-24)
М			1.2.3		Student participation in Disability Mentoring Day activities
S		1.3			Enhance job-driven vocational training programs.
М			1.3.1		Percentage of participants who are in education or training program achieving measurable skills gains
М			1.3.2		Consumers participating in customized training and demand-driven training
G	2			Government and Citizens	We will be a team of highly qualified professionals who have the commitment, accountability, and opportunity to excel.
S		2.1			Provide training to equip staff to enhance their ability to provide quality vocational rehabilitation services.
М			2.1.1		New employees who completed all assigned training in their first year of employment.
М			2.1.2		Percentage of Professional Development class attendees who evaluate the course as "useful" or "very useful" for their development and job performance.
S		2.2			Foster an environment promoting professional growth and future leadership opportunities, employee accountability and ethical standards.
М			2.2.1		Level of Goal Attainment Toward Equal Employment Opportunity
М			2.2.2		Agency staff turnover rates compare favorably with average for S.C. state government and average for government entities nationally
М			2.2.3		Percentage of consumer complaints resolved without need for formal administrative review
G	3			Government and Citizens	Accountability to taxpayers through efficient and effective use of resources entrusted to us
S		3.1			Successful outcomes for clients and claimants using resources efficiently
М			3.1.1		Median earnings of program participants who are employed during 2nd quarter after exit
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М			3.1.2		Amount each successfully rehabilitated consumer will repay in taxes for each dollar spent on his or her rehabilitation
М			3.1.3		Percentage of consumers surveyed one year after successful employment outcome who say they would recommend VR to others
М			3.1.4		SSA Disability Determination Documentation Accuracy
S		3.2			Continued evaluation and improvement of key processes
М			3.2.1		Agreed Upon Procedures audit findings
М			3.2.2		Program Integrity Compliance Assurance results
М			3.2.3		Average number of days for consumer advancement from application to development of Individualized Plan for Employment
S		3.3			Ensure safety, security and adequacy of infrastructure.
М			3.3.1		Lower the Experience Modifier (EMOD) through excellence in safety precautions
М			3.3.2		SOC alert incidents are addressed and reported within 24 hours
М			3.3.3		Annual completion of cyber security awareness training by all VR general program employees
G	4			Public Infrastructure and Economic Development	Maintain a dynamic network of partnerships to shape a better future for all stakeholders.
S		4.1			Increase collaboration with other state agencies and community organizations.
М			4.1.1		New applicants referred for VR services
М			4.1.2		Increase in cooperative agreements associated with strategic goals
М			4.1.3		VR involvement level with integrated business service teams for all local Workforce Development Boards
S		4.2			Mutually beneficial partnerships with business and industry that provide employment/ training opportunities for consumers and a

				nted, skilled workforce for the business imunity.
M		4.2.1	Emp	ployer penetration rate
М		4.2.2	Repe	eat business customer rate
М		4.2.3		eements with business and industry for job diness training for VR consumers

(m) Order of Selection. Describe:

- (1) Whether the designated state unit will implement an order of selection. If so, describe:
 - (A) The order to be followed in selecting eligible individuals to be provided VR services.

SCVRD is not implementing an order of selection.

(B) The justification for the order.

SCVRD is not implementing an order of selection.

(C) The service and outcome goals.

SCVRD is not implementing an order of selection.

(D) The time within which these goals may be achieved for individuals in each priority category within the order.

SCVRD is not implementing an order of selection.

(E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

SCVRD is not implementing an order of selection.

(2) If the designated state unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

SCVRD is not implementing an order of selection.

- (n) Goals and Plans for Distribution of title VI Funds.
 - (1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

SCVRD's supported employment goals and plans regarding the Title VI program are based on an analysis of the comprehensive statewide needs assessment and the department's performance on the common performance measures as well as agency key performance indicators. The priorities are as follows:

 Strengthening service delivery afforded to individuals whose disabilities and vocational needs are so significant that SCVRD's 110 traditional program services would not be sufficient to meet their employment needs;

- Providing services to people with the most significant disabilities, especially SSI and/or SSDI recipients, in order to successfully achieve and maintain competitive employment in integrated work settings; and
- Providing supported employment services to youth with the most significant disabilities.

In SFY 2019, SCVRD used designated funds received under section 603 of the Rehabilitation Act for the provision of supported employment services for the following goals and priorities:

- Job coaches serving the Conway, Sumter, Spartanburg, and Lexington areas.
- SCVRD continues its partnership with DDSN in an ongoing demonstration project designed as an intensive placement and support program in the Lexington area. DDSN makes referrals to a specified VR counselor and job coach who are designated to exclusively serve these consumers. This demonstration project incorporates many of the IPS evidence-based practices in providing services to individuals with most significant disabilities including those with intellectual disabilities. The key practices focus on individualized, consumer-centered services to assist persons with cognitive impairments and emphasize rapid job placement as appropriate into competitive, integrated jobs. Follow up supports are provided in integrated work settings. In SFY 2019, the Lexington site achieved a 100 percent rehabilitation rate.
- (2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:
 - (A) the provision of extended services for a period not to exceed 4 years; and
 - (B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Activities with funds reserved for services for youth with the most significant disabilities (section 603(d)) included the following:

- Project SEARCH is a national model based on intensive internship experience and job coaching. It pairs students in their final year of school with a host business/employer site that includes a series of internships to build job skills as well as to explore career opportunities. This program model is business-led, with partner support provided through the school district, VR, Development Disabilities agencies, and other community partners. It focuses on serving young adults with intellectual and developmental disabilities, as well as other students who may not otherwise have access to the immersion-based approach of this program. Interns in Project SEARCH train in real work settings, which allow the program staff to teach competitive, marketable, and transferable skills. The outcome goal of the program is competitive, integrated employment. The first site in South Carolina was established in Spartanburg during SFY 2014. This has now expanded to fourteen sites. In this program, students participate in a series of internships at a host business site, receive intensive instruction and job coaching, and are placed into competitive employment, often at the host business site and often prior to completion of their final year of high school. The ten sites that have been operating for longer than one year have an average success rate of 77% (participants achieving competitive, integrated employment).
- SCVRD leverages other public and private funds to increase resources for extended services.
 Extended services providers are identified in each area to provide follow along and extended services following successful exit from the VR program. Partnerships at the state and local level with DDSN and the local DSN boards continue to grow and provide key linkages to extended services providers.

- (o) State's Strategies. Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):
 - (1) The methods to be used to expand and improve services to individuals with disabilities.

SCVRD is entering into TSS agreements with additional schools to enhance the transition services, including Pre-ETS, provided in those schools. More job coaches are also being hired to increase the capacity to provide the level of support they offer. The IPS program, in partnership with DMH, has been expanded to every mental health center in the state, to include 17 sites. And, SCVRD is now involved with fourteen Project SEARCH sites in the state.

(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

Rehabilitation engineers provide evaluation and implementation of assistive technology devices throughout the rehabilitation process based on individualized consumer needs.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

SCVRD has hired regional staff who are fluent in Spanish and who are fluent in sign language to increase capacity for reaching and serving the Hispanic and Deaf and Hard of Hearing populations, respectively. Both of these populations have and/or are anticipated to increase in the state, per the Comprehensive Statewide Needs Assessment.

- (4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).
- In response to the WIOA mandates for provision of Pre-Employment Transition Services (Pre-ETS), SCVRD is expanding its approach to service delivery for students through contractual and pilot programs to ensure that all statutory and regulatory requirements are met, and that Pre-ETS are made available to all eligible and potentially eligible students that are interested in receiving those services.
- (5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Based on the findings in the most recent CSNA, the network of SCVRD area offices, work training centers and comprehensive programs across the state ensure statewide delivery of VR services to all populations in need of VR services.

Some years ago, the need to expand the SCVRD area office and work training center located in Seneca (referred to internally as the Oconee Pickens office) was identified. As stated in the CSNA, Oconee and Pickens counties are largely rural counties that are situated within the Upstate region of the state. That region has experienced extensive growth in many industries such as advanced manufacturing and health care. In combination with interest from employers and legislators, the Oconee Pickens office has been identified as a site needing additional capacity (space) for service delivery staff. In response to WIOA as well as local and regional economic and workforce development needs, it has also been identified as a

location requiring expansion of its work training center facility to provide customized and demand-driven training opportunities for consumers. With expansion of the work training center, there will be development of customized and demand-driven trainings that meet the needs of business and industry that have previously been limited due to space. Support for state funding for the project demonstrates the need and interest of the community.

With the expansion of the work training center, acquisition of additional business contracts in advanced manufacturing techniques are subassembly are anticipated. Examples of current contracts include Electrolux - fan assembly; Greenfield Industries - drill bit quality control, sorting, and packaging; Ulbrich – medical spool quality control and sorting; Parkway Products – door fuel inlet automotive assembly; and Schneider Electric – Trip Switches sub assembly.

The purpose of these contracts is to provide job readiness training and skills enhancements for SCVRD consumers that, in turn, meets the needs of employers in the community. It will also allow us a greater ability to work with our business partners on the development of demand driven and customized trainings. One of the strategies included in the SC WIOA state plan is sector partnerships, which are industry-led coalitions focused on a specific employment sector. In the Greater Upstate region, the manufacturing sector partnership has identified an action team to address gaps in middle-skill technical jobs. Capacity for demand-driven and customized trainings that are informed by this industry group will be available through these additional contracts with business. Eligible SCVRD consumers who have been identified on their IPE as needing job readiness training and vocational training in manufacturing will be training on these contracts (job readiness training).

The additional contracts are anticipated to generate approximately \$8640 per month in program income. In accordance with CFR 361.63, program income earned will be used to supplement Federal funds that support SCVRD's program activities.

Per the project plan submitted to the State, the following is a summary of the project:

Design and construct an 8200 square foot addition and 1407 square foot renovation to the existing Work Training Center and production space, clean work room, offices, and storage. This addition will be utilized for additional contract work space used to provide consumers with job readiness training.

Replace the roof of the Oconee/Pickens VR Center Building, consisting of approximately 20,000 square feet of roof deck. Remove approximately 20,000 square feet of existing built up roof. Apply roof insulation and SBS smooth granular surfaced modified bitumen roofing system with associated flashings and metalwork. New roofing system to have a 20-year warranty. Removal and disposal of asbestos containing roofing and flashing materials may be required.

The roof is approximately 29 years old and has exceeded its life expectancy. The addition is needed to increase capacity to serve the growing consumer population in this region, as well as to increase the types of contract work necessary to train our consumers for competitive employment.

SCVRD has historically operated two substance abuse treatment facilities in the state, Holmesview Center in Greenville and Palmetto Center in Florence. Holmesview Center was destroyed in a fire in November of 2016. Plans for rebuilding that Center are currently going through state procedures. Due to aging infrastructure and safety concerns, the Palmetto Center was rebuilt and is in operation. The need for these existing programs has long been established.

(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

The goals, strategies, and objectives included in the SCVRD strategic planning template outline the strategies to improve performance of SCVRD with respect to the performance accountability measures under section 116 of WIOA. Specifically, strategies and measures under Goal 1 address participant outcomes, including school-to-work transition and trainingstrategies. Strategies and measures for Goal 4 pertain to partnerships with other agencies and organizations, as well as business and industry.

(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

Strategies and measures under Goal 1 address participant outcomes, including school-to-work transition and training strategies. Strategies and measures for Goal 4 pertain to partnerships with other agencies and organizations, as well as business and industry.

- (8) How the agency's strategies will be used to:
 - (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;
 - (B) support innovation and expansion activities; and
 - (C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

The goals in the Strategic Planning Template were established based on the findings of the most recent comprehensive statewide needs assessment (as of the development of the Strategic Plan) and are updated annually in conjunction with the agency's strategic planning efforts as well as state-specific reporting requirements. Each goal is tied to a defined strategy and set of objectives, designed to be specific, measurable, attainable, relevant/realistic, and timely. These are long-term planning goals, strategies, and objectives that include, at minimum, annual assessment of results as well as adjustment and revision based on needs of the state and further implementation of WIOA.

SCVRD has hired additional job coaches and is working to enhance the partner relationships with DDSN and its network of providers serving the I/DD population.

- (p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:
 - (1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.

The WIOA Common Performance Measures are still in the baseline/benchmark phase for VR programs, so no performance targets have been set. Performance measures are in place, however, for evaluation of the extent to which the goals identified in the Strategic Planning Template are achieved. The template also indicates the strategies being employed to achieve the goals.

(B) Describe the factors that impeded the achievement of the goals and priorities.

Factors that impeded the achievement of goals and priorities or resulted in a necessary shift in goals and priorities during the year, include the active management of employee attrition to reduce our expenditures while maintaining an appropriate level of service delivery to our consumers. In addition, we continue to make adjustments and programmatic changes required for full implementation of requirements under WIOA.

- (2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.

Strategies that contributed to the achievement of overall goals and specific objectives included:

- Review and measurement of key performance indicators on a quarterly basis.
- Monthly monitoring and specialized reporting on the results of outreach efforts to underserved and emerging disability populations.
- Monthly monitoring and specialized reporting on services to youth and Pre-Employment Transition Services.
- Dedicated staff for specific populations and specialized services: school-to-work transition; deaf and hard of hearing; supported employment.
- Demonstration programs to enhance supported employment services and services for youth with the most significant disabilities, individuals diagnosed with ASD, and demand-driven training based on community labor market information.
 - (B) Describe the factors that impeded the achievement of the goals and priorities.

Factors that impeded the achievement of goals and priorities or resulted in a necessary shift in goals and priorities during the year, include the active management of employee attrition to reduce our expenditures while maintaining an appropriate level of service delivery to our consumers. In addition, we continue to make adjustments and programmatic changes required for full implementation of requirements under WIOA.

(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

The WIOA Common Performance Measures are still in the baseline/benchmark phase for VR programs. Performance data for these measures are being collected and reviewed regularly.

(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

Innovation and expansion activities have been identified within these strategies and include:

- Continued expansion of work-based learning activities for students
- Expansion of Project SEARCH sites
- Cooperative agreement with Project HOPE Foundation, a non-profit organization that provides a lifespan of services and activities for individuals with autism
- Maintaining a full-time counselor to provide vocational rehabilitation services to incarcerated youth, which has expanded to include additional programs operated by DJJ (e.g., Camp Aspen)
- Maintaining a staff interpreter for consumers who are deaf to provide video remote interpreting, on- site services to mutual consumers of SCVRD and DHHS, extend consistent access to interpreter services in rural areas, and enhance the accessibility of VR productions and consumer and staff training materials
- On-The-Job training services
- Maintaining statewide/regional business specialists who provides support to local business development specialists across the state as well as providing support to local and regional business services teams, which are interagency groups that coordinate business services under WIOA

- Upgrades and continued development of job readiness training services, including an electronic MAP (My Action Plan) document, which is an individualized plan for job readiness training, and development of demand-driven skills training opportunities
- Continued development of business database systems (Universal Business Database) to enhance consumer service delivery, career placement activities, and benchmarking services to employers
- (q) Quality, Scope, and Extent of Supported Employment Services. Include the following:
 - (1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.
 - (2) The timing of transition to extended services.

SCVRD employs 35 full-time job coaches having a high school diploma or a bachelor's degree in a related field. This includes the job coaches who provide IPS services to DMH consumers through an MOA. In addition, SCVRD employs 14 transition job coaches who provide supported employment services to youth with the most significant disabilities.

Job coaches work as part of a team along with other SCVRD staff and extended support representatives. Through the efforts of these job coaches, supported employment services are available statewide to individuals with the most significant disabilities.

Initial diagnostic evaluation services are conducted while in the traditional 110 programs. If needed, a supplemental evaluation may be performed with the use of a job coach. At the time of acceptance for supported employment services, an Individualized Plan for Employment (IPE) is developed outlining the job coach services to be provided. Such services include job development, job placement, OJT, observation or supervision at or away from the job site, and support services with the employer, consumer, or family. SCVRD policy allows for any activity performed by a supported consumer at the employer's location to be a paid work experience.

SCVRD's ongoing support services are limited to 24 months unless extended by an amendment to the IPE. Transition to extended services starts after an individual is stabilized in his/her job setting and has met the individualized work goal. The consumer's employment stability is determined by the achievement of adequate job performance without a need for ongoing, intensive shadowing/mentoring from the job coach. The consumer, employer, job coach, and SCVRD counselor agree that this has occurred before transition to the extended service provider takes place. SCVRD continues to leverage resources for identifying extended service providers to meet long-term support needs. Extended services providers are identified in each area. Partnerships at the state and local level with DDSN and its network of providers continue to grow and provide key linkages to extended services providers. Planning for extended services is done in advance, such that service provision can be authorized timely and allow for a seamless transition from VR services to the extended services provider's follow along.

Contingent upon the significance of the consumer's supported employment needs; there could be an initial training period of two to six weeks, which would be followed by ongoing job coach involvement of least 90 or more days prior to determining whether the consumer is ready for extended services. In addition, SCVRD may provide post-employment services following transition if needed to maintain the placement.

The overall objective for each individual receiving supported employment services is successful competitive employment in an integrated work setting. For this to occur, the supported employment team works to assure consumer and employer satisfaction in terms of both production and fulfillment of the individual's needs.

The individual placement model for competitive employment remains the primary supported employment model being used by SCVRD. Emphasis is placed upon providing services to people with most significant disabilities, especially SSI and/or SSDI recipients, whose employment needs are so significant that traditional 110 program services would not be sufficient to meet them. SCVRD coordinator of supported employment services also assists area office staff to identify and serve all eligible consumers with the most significant disabilities.

Vocational Rehabilitation- South Carolina Commission for the Blind

The Vocational Rehabilitation (VR) services for the Blind portion of the South Carolina Unified State Plan must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA):

- (a) Input of the State Rehabilitation Council. All agencies, except for those that are independent consumer-controlled commissions, must describe the following:
 - (1) The input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions:
 - (2) the designated state unit's response to the Council's input and recommendations; and
 - (3) the designated state unit's explanations for rejecting any of the Council's input or recommendations.
- **SCCB Response:** The South Carolina Commission for the Blind (SCCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section. The results of the 2016 Comprehensive Statewide Assessment of Rehabilitation Needs and subsequent State Plan submissions have been reviewed and approved by the SCCB Board of Commissioners.
- **(b) Request for Waiver of Statewideness.** When requesting a waiver of the statewideness requirement, the Designated Sate Agency must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:
 - (1) A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request.
 - (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.

SCCB Response: SCCB is not requesting a waiver of statewideness.

- (c) Cooperative Agreements with agencies not carrying out activities under the Statewide Workforce Development System. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce investment system with respect to:
 - (1) Federal, State, and Local Agencies and Programs;

SCCB Response: SCCB has developed and signed Cooperative Agreements with the following agencies:

- South Carolina Department of Health and Human Services (DHHS) to create administrative efficiencies and improve services to consumers statewide;
- South Carolina Worker's Compensation Commission (WCC) to facilitate the referral process of injured workers to SCCB to enhance return-to-work efforts;
- Social Security Administration (SSA) to collaborate on employment incentives and supports and maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program;
- South Carolina Office of Veterans' Affairs (OVA) to help identify veterans who need additional supports in securing benefits, gaining employment, and accessing advocacy services;
- South Carolina Department of Disabilities and Special Needs (DDSN) to eliminate potential duplication of services and increase coordination of employment services provided to the shared consumer populations;
- South Carolina Department of Social Services (DSS) to eliminate duplication of services and increase coordination of employment services provided to the shared consumer populations;
- South Carolina Department of Mental Health to collaborate, coordinate, eliminate potential duplication of services, and enhance the employment outcomes of shared consumer populations.
- (2) State Programs carried out under section 4 of the Assistive Technology Act of 1998:

SCCB Response: SCCB has a cooperative agreement with the South Carolina Assistive Technology Program at the University of South Carolina School of Medicine to access comparable benefits, eliminate duplication of services, and increase coordination of employment services provided to shared consumer populations.

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

SCCB Response: SCCB has developed partnerships with the local office of the U.S. Department of Agriculture to develop cooperative efforts to provide services to South Carolinians who are blind or visually impaired.

(4) Non-educational agencies serving out-of-school youth; and

SCCB Response: Non-educational agencies serving out of school youth participate in South Carolina's statewide workforce development system and are partnered with through the provisions of the Unified State Plan and the Workforce Development System.

(5) State use contracting programs.

SCCB Response: No such State Use Contracting Program exists in South Carolina.

(d) Coordination with Education Officials. Describe:

- (1) the Designated State Agency plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services, including pre-employment transition services, as well as procedures for the timely development and approval of Individualized Plans for Employment for students with disabilities; and
- (2) Provide information on the formal interagency agreement with the state educational agency with respect to:
 - (A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;
 - (B) transition planning by personnel of the designated state agency and educational agency that facilitates the development and completion of their individualized education programs;
 - (C) roles and responsibilities, including financial responsibilities, of each

agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services;

(D) Procedures for outreach to and identification of students with disabilities who need transition services.

SCCB Response: SCCB has a current and updated Cooperative Agreement with the South Carolina Department of Education, and has local area Memorandum of Understandings with Local Education Authorities (LEA's). Coordination with education officials is accomplished on three (3) distinct levels of the SCCB service delivery process.

These three levels include:

SCCB Children's Services Program: This program serves children ages 3 through 12. The Children's Services Counselors coordinate care with educational entities such as the local school districts and the SC School for the Deaf and Blind (SCSDB). Service delivery includes evaluations for low vision aids and assistive technology, consultation and advocacy and information and referral services.

SCCB Career BOOST (Building Occupational Opportunities for Students in Transition): Is a contractual program in partnership with South Carolina's Independent Living Centers, the National Federation of the Blind of South Carolina, and LEA's. Pre-Employment Transition Services are provided to eligible and potentially eligible students with visual disabilities. These services include Self-Advocacy Workshops, Work Readiness Soft Skills Workshops, Exploration of Higher Education through College Tours, and Work Based Learning Experiences.

SCCB Vocational Rehabilitation Program: This program serves students from age 13 through 21. SCCB has three (3) dedicated Transition Vocational Rehabilitation Counselors statewide building program infrastructure and education relationships to improve services to Transition Students. The Transition Counselors primarily collaborate with education officials such as the South Carolina Department of Education, LEA's, the South Carolina School for the Deaf and Blind (SCSDB) and the South Carolina Department of Disabilities and Special Needs (SCDDSN).

Transition Counselors develop the initial Individualized Plan of Employment (IPE) and provide Pre-ETS services with a focus on Job Exploration Counseling while the consumer is enrolled in secondary or post-secondary education and is between the ages of 13 through 21. The IPE includes services pertaining to the adjustment, prevention or stabilization of vision, and Pre-Employment Transition Services as defined in the Workforce Innovation and Opportunities Act (WIOA).

In an effort to avoid the duplication of services, low vision and assistive technology needs are coordinated with local school districts in accordance with the student's Individualized Education Plan (IEP) and IPE. In such instances, the alternative service providers and funding sources will be identified on the IPE and coordinated accordingly.

SCCB conducts semiannual meetings with the statewide vision teachers in an effort to facilitate the coordination of services to the most significantly disabled students and their need for supported employment services. Discussions include, but are not limited to, collaboration with SCDDSN, SCDOE and the SCSDB to coordinate transition services. The main source of referrals to the Transition Counselors is the school district.

Procedures for outreach to, and identification of blind and visually impaired students include, but are not limited to, the utilization of SCCB program data, statistical data from the Data Analysis System of the US Department of Education (Office of Special Education) and the American Community Survey data. An annual analysis of the data from these sources identifies the location of transition aged unserved and underserved individuals.

In an effort to address the assistive technology needs of college bound transition consumers, SCCB sponsors an annual Technology Day. The need for this initiative arose due to an increase in the number of blind and visually impaired students who were failing college courses due to an inability to take notes and complete assignments. During technology day, consumers are assessed and trained on the latest assistive technology software and equipment. Assistive technology recommendations for each student are contingent upon the level of blindness, skill level and school requirements. Technology Day is conducted by the SCCB Training and Employment Department. Over fifty students from across the state participated in Technology Day 2019. In addition, SCCB hosts joint events with contractors to ensure that students are receiving quality Pre-ETS services and to facilitate referral and application to the SCCB VR program.

SCCB is an actively engaged partner in the Transition Alliance of South Carolina (TASC) a multi- agency partnership between the South Carolina Department of Education, South Carolina Vocational Rehabilitation Department, South Carolina Department of Disability and Special Needs, and Local Education Agencies to facilitate the coordination of services to transition students leading to employment and independent adult living.

SCCB has a formal written Cooperative Agreement with the South Carolina Department of Education that includes provisions for:

(A) mutual consultation and technical assistance to assist educational agencies

and SCCB in planning for the transition of students with disabilities from school to post-school activities, including VR services;

- (B) transition planning by personnel of the designated state agency and educational agency that facilitates the development and completion of their individualized education programs;
- (C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services; and
- (D) Procedures for outreach to and identification of students with disabilities who need transition services.
- **(e) Cooperative Agreements with Private Nonprofit Organizations.** Describe the manner in which the Designated State Agency establishes cooperative agreements with private non- profit vocational rehabilitation service providers.
- **SCCB Response:** SCCB has actively established Cooperative Agreements and community partnerships. SCCB is committed to being an active, cooperative and collaborative partner with community entities wherever such reciprocal relationships can benefit consumers and enhance the effectiveness and efficiency of the VR program. SCCB has developed and maintains Cooperative Agreements with the following entities not carrying out activities under the Statewide Workforce Development System:
 - •The National Federation of the Blind (NFB) of South Carolina for the purposes of ensuring statewide availability of adjustment to blindness training, job readiness and computer skills training, independent living skills training.
 - The Association for the Blind and Visually Impaired (ABVI) for the purposes of ensuring statewide availability of adjustment to blindness training, job readiness and computer skills training, and independent living skills training.
 - South Carolina Association of the Deaf, Inc.
 - Goodwill Industries for the purposes of providing statewide access to job readiness and computer skills training.
 - The Helen Keller National Center (HKNC) for the purpose of expanding training options for consumers who are Deaf/Blind and need training beyond the scope of programs provided at the Ellen Beach Mack Rehabilitation Center for Employment and Independence (EBMRCEI).
 - · Informal partnerships with community-based partners such as faith-based

- organizations, charitable organizations, and non-governmental community-based organizations.
- Community Rehabilitation Programs providing Orientation and Mobility, Home Management, and Braille Instruction on a fee-for-service basis.
- (f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services. Describe the efforts of the Designated State Agency to identify and make arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities in order to provide Supported Employment (SE) services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.
- **SCCB Response:** SCCB has established an internal Supported Employment program that includes Customized Employment provided by three (3) regionally assigned JOBS Specialists. SCCB has signed a Partnership Plus Agreement with ABLE SC under provisions in the Ticket- to-Work program to provide ongoing supports. SCCB is working to establish other Cooperative Agreements with entities providing ongoing supports to consumers in Supported Employment.
- **(g) Coordination with Employers.** Describe how the Designated State Agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:
 - (1) Vocational Rehabilitation Services; and
 - (2) Transition services, including Pre-Employment Transition Services, for students and youth with disabilities.
- **SCCB Response:** SCCB actively engages with the South Carolina business community through services provided by the Training & Employment Division (T&E) Employment Consultants. Both Employment Consultants and VR Counselors participate in local workforce boards. SCCB T&E Employment Consultants build and maintain partnerships with businesses to:
 - Assess and better understand the unique human resource needs of South Carolina businesses:
 - To help align SCCB programs to better meet the unique and specific human resource needs of South Carolina businesses;
 - To create, establish, and foster relationships with South Carolina businesses that help them meet their unique and specific human resource needs, including talent

acquisition and talent retention;

- Develop opportunities for Work Based Experiences, Internships, Job Shadowing, and other work-based learning experiences that provide South Carolina Businesses with opportunities to gain experience with a diverse and qualified workforce;
- Create mutually beneficial relationships and facilitate linkages of job openings to a highly skilled and diverse talent pool of candidates. Referrals of consumers who are seeking employment and who have been judged to be Job Ready are received from SCCB Vocational Rehabilitation Counselors. The Employment Consultant's role is job development and placement that meets the needs of the business and the consumer. The Consultant also provides businesses and consumers with access to services that can be provided by SCCB or other governmental agencies. Incentives that may be applicable are also presented. These include:
 - The Work Opportunity Tax Credit (WOTC). This program allows a maximum available credit of \$2,400 per eligible worker.
 - Sensitivity and awareness training for employers and organizations. This training includes American Disability Act (ADA), sighted guide techniques and attitudes regarding blindness. The presentation is designed to remove myths and apprehensions about blindness.
 - Technical assistance for the implementation and support of assistive technology.
- SCCB T&E Division also employs Assistive Technology Consultants (AT Consultants) who work directly with businesses and consumers to:
 - Provide assessment and technical assistance in the provision of work place modifications and/or assistive technology solutions considered reasonable accommodations that enable a consumer who is blind to become an asset to the business partner;
 - Make recommendations for software and/or other equipment which would enable the consumer to successfully engage in employment;
 - Creates customized software solutions which may be necessary to allow the consumer to access computer systems effectively;
 - Recommends the purchase of required equipment and/or software to the Vocational Rehabilitation Counselor; and,
 - Oversees the delivery and installation of this equipment on the work site and provides the consumer training on any specialized applications.
- (h) Interagency Cooperation. Describe how the Designated State Agency will collaborate with the State agency responsible for administering each of the following

programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

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

SCCB Response: SCCB will be working to develop a new Cooperative Agreement with the South Carolina Department of Health and Human Services (DHHS), the state agency responsible for administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). This Cooperative Agreement will outline the roles and responsibilities of all parties regarding the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program as applicable to South Carolina.

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

SCCB Response: SCCB is developing an updated Cooperative Agreement with the South Carolina Department of Disabilities and Special Needs (DDSN) to avoid duplication of services, increase coordination of employment services provided to the shared consumer populations, and to enhance Supported Employment programs.

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

SCCB Response: SCCB is developing a new Cooperative Agreement with the South Carolina Department of Mental Health to collaborate, coordinate, avoid duplication of services, and enhance the employment outcomes of shared consumer populations.

- (i) Comprehensive System of Personnel Development: Data System on Personnel and Personnel Development. Describe the Designated State Agency procedures and activities to establish and maintain a Comprehensive System of Personnel Development (CSPD) designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the Designated State Agency, including the following:
 - (1) Data System on Personnel and Personnel Development
 - (A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
 - (i). the number of personnel who are employed by the Designated

State Agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

- (ii). the number of personnel currently needed by the Designated State Agency to provide VR services, broken down by personnel category; and
- (iii). projections of the number of personnel, broken down by personnel category, who will be needed by the Designated State Agency to provide VR services in 5 years based on projections of the number of individuals to be served including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

SCCB Response: Staffing patterns are set through a joint effort of the SCCB Commissioner, Director of Consumer Services, Senior Management staff as appropriate, and Regional Directors. In an effort to assess current staffing and hiring needs, SCCB analyzes the following data on an annual basis:

- 1. Rate of consumer referrals to the VR Program
- 2. Ratio of VR Counselors to consumers certified eligible for VR services
- Ratio of VR Counselors to consumers served
- 4. State Demographic Trends (Incidence of Blindness, Population estimates)
- Employment/Unemployment data trends
- 6. Current and projected monetary resources

The SCCB VR program received 640 new referrals during FFY 2019 and served a total of 1,144 eligible consumers. This represented a consumer to VR Counselor ratio of 71.5 to 1. The following table illustrates numbers of VR staff broken down by job title, current vacancies, and projected vacancies over the next five (5) years. Staffing patterns are continuously evaluated by SCCB administration in an effort to make projections for future capacity to provide quality vocational rehabilitation services.

Item Number	Job Title	Number of	Number of	Number of
		Positions	Current	Projected
			Vacancies	Vacancies Over
				the Next 5 Years
1	VR Counselors	13	0	3
2	Transition VR	3	0	1
	Counselors			
3	VR Assistants	9	2	2
4	Employment	3	1	1
	Consultants (job			
	placement)			

5	Counselor	1	1	0
	Trainer			
6	Jobs Oriented	3	1	1
	Blind Specialists			
	(Supported			
	Employment)			
7	Rehab	16	1	3
	Instructors			
8	Nurse	1	1	1
9	Quality	1	0	0
	Assurance			
	Reviewer			
10	Other Staff,	33	5	6
	Drivers, BEP, and			
	Support Staff			
	Totals	84	14	18

- (B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on annual basis data on personnel development with respect to:
 - (i). a list of institutions of higher education in the State that are preparing VR professionals, by type and program;
 - (ii). the number of students enrolled at each of those institutions, broken down by type of program; and
 - (iii). the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by personnel category for which they have received, or have the credentials to receive, certification or licensure.

SCCB Response: SCCB maintains relationships with the University of South Carolina and South Carolina State University, both of which produce graduates who have Master of Rehabilitation Counseling degrees. In addition, SCCB has developed an agreement to provide internship opportunities to Alabama State University Master of Rehabilitation Counseling students.

SCCB has set a Comprehensive System of Personnel Development (CSPD) standard that requires potential VR Counselors to hold a master's degree in Rehabilitation Counseling or a related field. The following chart shows statistics for the in-state university vocational rehabilitation counseling degree programs.

Institution	Number of Students	Number of Students
	Currently Enrolled in MRC	Graduated with MRC in the

		Previous Year
University of South Carolina	40	12
South Carolina State	45	27
University		

(2) Plan for Recruitment, Preparation, and Retention of Qualified Personnel. Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the Designated State Agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

SCCB Response: SCCB has established a plan for the recruitment, preparation, and retention of qualified VR Counselors. This plan consists of the following areas of focus:

Recruitment: SCCB maintains relationships with graduate training programs that are Council on Rehabilitation Education (CORE) accredited located at the University of South Carolina and South Carolina State University. SCCB's recruitment plan ensures recruitment activities are conducted at all South Carolina schools that have graduates in Vocational Rehabilitation Counseling. In addition, SCCB has written agreements with Alabama State University to provide internships to master's degree students as part of our recruitment efforts. SCCB also utilizes social media and other online job posting sites to advertise vacant positions. The University of South Carolina and South Carolina State University prepare individuals for graduate degrees in VR Counseling, SCCB conducts outreach efforts to these universities and other universities to include: publications and distribution of targeted recruiting material, attendance at career days and job fairs, and recruitment events. In addition, practicum placements and internships are offered to students who are in CSPD qualifying programs. These efforts are designed to recruit qualified personnel, including minority graduates and those with disabilities. SCCB has been especially successful in recruiting personnel from the SC institutions, particularly those from minority backgrounds. Students from these programs and out-of-state programs are encouraged to accept internships and practicum placements with the Commission.

Preparation: Staff preparation begins with SCCB's high standards for professional education and professional certification that occurs primarily prior to employment with the agency. SCCB assists eligible staff with costs related to obtaining and renewing CRC Certification and obtaining a Master's in Rehab Counseling. All new staff are required to attend and complete SCCB's New Employee Orientation program that provides basic preparation and onboarding. Further professional training and development occurs with

the direct supervisor, and SCCB actively engages staff in ongoing professional preparation and development. SCCB uses a system for staff evaluation that is available to all state employees. The system focuses on the individual employee's job duties compared to stated goals and objectives. These goals and objectives are identified and discussed with the employee at the beginning of the rating period. Ongoing communication between the employee and supervisor clarifies the employee's understanding of how to meet the performance standards and enhances service delivery to the consumer. At the conclusion of the rating period, an evaluation is performed to rate the employee on each duty in relation to performance objectives. The system provides for employee input into the development of the goals and objectives in order to support successful performance. Another feature of the system allows objectives to be amended throughout the review period. This system provides a mechanism for helping a substandard performer improve and a means of removing an employee from a position should performance not improve to an acceptable level.

Retention: SCCB takes an active role in employee/employer relations and encourages communication between field staff and senior management through a suggestion box, SCCB newsletter, and quarterly VR conference calls between the VR Director and all other VR staff. As a result of increased communication between senior management and field staff, and as a result of staff feedback, SCCB implemented salary increases for VR Counselors and VR Assistants in order to improve retention and reduce turnover in these critical positions in 2019. Through strong leadership and the assistance of all staff, the Commission provides a healthy and safe work environment. Employee behavior and performance problems are addressed appropriately and in a timely manner, with an emphasis on assisting the employee to improve. SCCB promotes internal and external customer service and has made teamwork an integral part of day-to-day operations. SCCB provides career advancement and growth opportunities through internal promotions and staff training.

- (3) Personnel Standards. Describe the Designated State Agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and to ensure the Designated State Agency professional and paraprofessional personnel are adequately training and prepared including:
 - (A) Standards that are consistent with any national or State-approved or recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and
 - (B) The establishment and maintenance of education and experience requirements to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

SCCB Response: SCCB utilizes state standards to administer the Comprehensive System of Personnel Development (CSPD) as it relates to hiring practices. According to state law, VR Counselors must have a master's degree in Rehabilitation Counseling, or a master's degree in the field of counseling with a graduate course in Theories and Techniques of Counseling, or a master's degree in any discipline and at least 18 credit hours of coursework at the master's level or above within thirty months of the date of hire. The 18 credit hours of coursework must include the following: One graduate course with a primary focus on the Theories and Techniques of Counseling three graduate courses, each with a primary focus on one of the following areas: Occupational Information, Job Development and Placement, Medical Aspects of Disabilities, Foundations of Rehabilitation, Psychological Aspects of Disabilities, and Personal and Vocational Adjustment Two graduate courses, each with a primary focus on one of the following areas: Assessment, Research Methodology, Vocational and Career Development, Community Resources, Case Management, and Delivery of Rehabilitation Services; or a current Certified Rehabilitation Counselor (CRC) certification, regardless of degree.

SCCB currently has 0 vacant VR Counselor positions and 0 vacant Transition Counselor position that are in various stages of the recruitment process. Of the counselors currently employed by SCCB all meet the state minimum standard.

- (4) Staff Development. Describe the Designated State Agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the Designated State Agency receive appropriate and adequate training in terms of:
 - (A) a system of staff development for professionals and paraprofessionals within the Designated State Agency, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
 - (B) procedures for the acquisition and dissemination of significant knowledge from research and other sources to Designated State Agency professionals and paraprofessionals.

SCCB Response: SCCB has developed a comprehensive staff development training program designed to expand and strengthen the knowledge and skill level of service delivery staff. During FFY 2018 SCCB has added a new VR Counselor Trainer position with the intent to provide more in-depth focused VR Counselor skill development. The four objectives outlined in the training program are based on the need to increase staff competency so that the quality and quantity of competitive employment placements can be improved. SCCB has partnered with the University of South Carolina and private and

public consultants specializing in the field of vocational rehabilitation and/or blindness in order to provide quality staff development training. The most critical training needs of SCCB staff were determined from the results of a Staff Development Training Needs Assessment, comments from Training Evaluations, and the VR Staff Survey results from Comprehensive Statewide Needs Assessment. Staff development training needs have been identified in the areas of Leadership Skills, Administrative Skills and Technical Skills.

Four (4) training objectives were identified as follows:

- Objective 1 (Leadership Training Objective) Organization assessment, problem solving skills, basic supervisory skills and best personnel practices are the primary focus areas of Objective 1. To accomplish the leadership training objective, SCCB utilizes Certified Public Management (CPM) training, State sponsored supervisory training, National Rehabilitation Leadership Institute (NRLI) and other targeted trainings and conference to keep our business practices up to date with current paradigms. SCCB recognizes that staff development needs may change.
- Objective 2 (Technical Skills Training) The development of technical skills to achieve the SCCB mission and vision is the primary focus of Objective 2. Private contractors who specialize in the field of blindness and vocational rehabilitation are utilized to accomplish Objective 2. Continued professional development and retention CRC credentials is encouraged and supported by SCCB.
- Objective 3 (Communication of Policies and Procedures) Orienting staff to the SCCB organizational structure and service delivery policies and procedures is the primary focus of Objective 3. In order to accomplish this, new staff will participate in an agency wide two-day Employee Orientation provided by HR. They will also receive field specific training in AWARE, VR training modules on policy and procedures, and shadow adjustment and VR staff for a two-week period.
- Objective 4 (Specialty Training) For FY 2020, each region is scheduled for quarterly meetings in which case staffing and regional specific trainings will be included. Departmental training schedules are currently being developed with the intention of holding one annual in-service when feasible. Bi-annual surveys of staff are done to stay abreast of trends in staff training needs. In an effort to provide equal access to staff development training for all staff, accessible formats (i.e. Braille, large print, electronic format, etc.) will be provided to those who require alternative formats.
 - (5) Personnel to address individual communication needs. Describe how the Designated State Agency has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

SCCB Response: SCCB strives to have qualified staff proficient in Braille production, in communication with the Deaf/Blind, and a bilingual counselor to communicate with the rapidly growing Hispanic population. SCCB engages in ongoing efforts to study demographic trends and changes to the population to identify areas of needed expertise. Braille services are provided to SCCB staff and upon request to other public and/or private entities statewide. SCCB has a Deaf/Blind Consultant who is proficient in the use of sign language for the deaf, hard of hearing and dual sensory impaired. SCCB contracts interpreter services as needed in order to serve all other individuals who have limited English speaking ability or limited modes of communication.

(6) Coordination of personnel development under the Individuals with Disabilities Education Act (IDEA). As appropriate, describe the procedures and activities to coordinate the Designated State Agency's CSPD with personnel development under IDEA.

SCCB Response: SCCB is improving collaboration with the South Carolina Department of Education (SCDOE) to coordinate procedures and activities under the Individuals with Disabilities Education Act (IDEA). The focus of the collaboration has been the development of strategies for improving service delivery systems for blind and visually impaired individuals who are receiving services from the SCCB Children's Services program and VR Transition Counselors. SCCB has become a fully engaged and active partner in the Transition Alliance of South Carolina (TASC) that includes regional coordinating councils where the partner agencies receive training, develop collaborative plans, and develop professional relationships. TASC is a partnership of the Department of Education, Department of Disability and Special Needs, Vocational Rehabilitation Department, and SCCB.

(j) Statewide Assessments.

- (1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR service needs of those:
 - (A) With the 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 development system; and
 - (E) Who are youth with disabilities and students with disabilities, including as appropriate, their need for pre-employment transition services or other

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.

SCCB Response: SCCB contracted with the National Center for Innovation, Training and Excellence (NCITE), a part of San Diego State University Research Foundation's Interwork Institute (SDSURF-II) during FFY 2019 to conduct a Comprehensive Statewide Needs Assessment to determine the vocational rehabilitation needs of South Carolinians who are blind or visually impaired, identify the areas of VR program operations where service gaps exist, and identify areas of program innovation and improvement to become fully compliant with requirements of the Workforce Innovation and Opportunities Act. This assessment was designed to specifically assess the areas noted under section (j) above.

(k) Annual Estimates. Describe:

(1) The number of individuals in the State who are eligible for services.

SCCB Response: Based on data obtained from the American Community Survey (ACS) and Cornell University's Annual Disability Status Report for South Carolina, SCCB estimates that 2.7 percent of the South Carolinians experience a visual impairment or blindness. (ACS criteria for visual impairments is broader than VR program eligibility) The most recent American Community Survey data indicates that there are an estimated 6,800 South Carolinians who have some level of visual impairment who are working age (21 to 64) and who are not currently working but are actively seeking employment. In addition to the ACS estimates there are 2,900 youth (age 16-20) who have visual impairments in the state. This is a total estimate of 9,700 individuals who have visual impairments between the ages of 16 and 64.

The visual impairment categorization in the ACS is very broad, all-inclusive, and self-reported. In estimating the number of individuals who would meet the narrower VR program eligibility criteria, SCCB estimates that in any given federal fiscal year there are approximately **3,250 potentially eligible individuals** within the state.

Of those SCCB is currently serving **1,043 eligible individuals**. SCCB is continues to engage in outreach efforts and strategies that strive to increase accessibility and awareness of the VR program so that potentially eligible individuals are aware of and can access VR services. In addition, SCCB is working with WIOA core partners to ensure that

blind and visually impaired individuals seeking employment can access services through the one-stop American Job Centers as part of the Statewide Workforce Development System.

- (2) The number of eligible individuals who will receive services under:
 - (A) The VR Program;

SCCB Response: SCCB estimates that the VR program will serve **1,200** during FFY 2020, and **1,230** during FFY 2021.

(B) The Supported Employment Program; and

SCCB Response: SCCB built the capacity to provide Supported Employment services in FFY 2017. SCCB is currently providing Supported Employment services to eight individuals. SCCB has established goals to provide Supported Employment services to ten individuals during FFY 2020, and ten individuals during FFY 2021.

(C) Each priority category, if under and order of selection.

SCCB Response: SCCB does not anticipate the need for an order of selection.

(3) The number of individuals who are eligible to VR services, but are not receiving such services due to an order of selection; and

SCCB Response: SCCB does not anticipate the need for an order of selection.

(4) The costs 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 priority category.

SCCB Response: SCCB does not anticipate the need for an order of selection.

- (I) State Goals and Priorities. The Designated State Agency must:
 - (1) Identify if the goals and priorities were jointly developed and agreed to by the state VR agency and the board, and jointly agree to any revisions.
 - (2) Identify the goals and priorities in carrying out the VR and Supported Employment Programs.

- (3) Ensure that the goals and priorities are based on an analysis of the following areas:
 - (A) the most recent comprehensive statewide assessment, including any updates;
 - (B) the State's performance under the performance accountability measures of section 116 of WIOA; and
 - (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

SCCB Response: The findings of the FFY 2016 Comprehensive Statewide Needs Assessment were used to develop goals, priorities, and strategies reflected in the previous iteration of the South Carolina Unified State Plan. See section (p.) *Evaluation and Reports of Progress* for information related to progress on the previous state plan goals and priorities.

For the current WIOA State Plan, SCCB identified gaps from two primary sources. The first being unmet gaps identified in the FFY 2019 Comprehensive Statewide Needs Assessment. The second source is the South Carolina Workforce Development Board's Economic Analysis and Strategic Plan. The following gaps have been identified:

- **Gap 1:** South Carolina's current labor force, including individuals who are blind or visually impaired, do not have industry recognized credentials, knowledge, skills, or abilities to meet current or emerging demands of the business community.
- **Gap 2:** SCCB needs to improve alignment of policies, resources, and staff expertise to provide job driven, labor market informed, vocational counseling and guidance that aligns with South Carolina's Talent Pipeline Project and Sector Strategies initiatives to assist eligible consumers in accessing career pathways that lead to high and middle skill/income jobs in growth sectors.
- **Gap 3:** SCCB needs to improve partnerships with business in order to more accurately identify current and future workforce needs of business and industry to support career pathways in growth sectors and improve services to business.
- **Gap 4:** SCCB needs to improve marketing, branding, and engagement with business, consumers, and other workforce partners to increase awareness, improve partnerships,

and increase effectiveness and efficiency of services leading to competitive integrated employment.

Based on these identified gaps, and in alignment with the South Carolina Workforce Development Board's Strategic Plan, SCCB establishes the following objectives. These objectives have been jointly developed and agreed to by the South Carolina Commission for the Blind Board and are in alignment with the Workforce Development Board's Strategies to Build a Competitive Workforce Plan.

Objective 1: Identify, invest and support blind and visually impaired job seekers in the attainment of industry recognized credentials and vocational training required for current and emerging jobs.

Objective 2: Align resources, policy, and strategies to continuously improve competitive integrated employment outcomes for blind and visually impaired job seekers.

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

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

See section (o) below for SCCB's goals and strategies to meet these objectives.

(m) Order of Selection. Describe:

- (1) Whether the designated state unit will implement an order of selection. If so, describe:
 - (A) The order to be followed in selecting eligible individuals to be provided VR services:
 - (B) the justification for the order;
 - (C) the service and outcome goals;
 - (D) the time within which these goals may be achieved for individuals in each priority category within the order;
 - (E) how individuals with the most significant disabilities are selected for services before other individuals with disabilities; and
 - (F) if the Designated State Agency has elected to serve eligible individuals, regardless of an established order of selection, who require

specific services or equipment to maintain employment.

(2) If the designated state unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

SCCB Response: SCCB tracks resources on a continual ongoing basis and has determined that the agency currently has the staff and financial resources to provide required and effective VR services to all eligible individuals in the state and does not anticipate implementing an Order of Selection.

(n) Goals and Plans for Distribution of Title VI Funds.

- (1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of Supported Employment Services.
- (2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:
 - (A). the provision of extended services for a period not to exceed 4 years; and
 - (B). how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

SCCB Response: The South Carolina Commission for the Blind has established the capacities to provide Supported Employment to youth and adults with Most Significant Disabilities in response to the findings of the FFY 2019 CSNA. Funds received under section 603 of the Rehabilitation Act for Supported Employment are utilized to fund the costs of individualized discovery assessment, job development, job placement, and onthe-job supports for Supported Employment and Customized Employment delivered internally by JOBS Specialists. SCCB provides extended services for a period not to exceed 4 years. SCCB has signed a Partnership Plus Agreement under the Ticket to Work program to provide long term on going supports through an Employment Network (Able SC). SCCB utilizes 50 percent of Supported Employment funds to provide Supported Employment and Customized Employment for eligible youth. SCCB has established goals to provide Supported Employment services to six eligible individuals during FFY 2018 and has provided supported employment services to six consumers in FFY 2019. SCCB predicts serving 10 individuals during FFY 2020, and 10 individuals during FFY 2021. SCCB is currently in the process of developing external agreements to provide Supported Employment services.

- **(o) State Strategies.** Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):
 - (1) the methods to be used to expand and improve services to individuals with disabilities;(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 on a statewide basis;
 - (3) the outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program;
 - (4) the methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and preemployment transition services);
 - (5) if applicable, plans for establishing, developing, or improving community rehabilitation programs within the state;
 - (6) strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA;
 - (7) strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities; and
 - (8) how the agency 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 relating to equitable access to and participation of individuals with disabilities in the State VR Services program and the State Supported Employment Program.

SCCB Response: The findings of the FFY 2016 Comprehensive Statewide Needs Assessment were used to develop goals, priorities, and strategies reflected in the previous iteration of the South Carolina Unified State Plan. See section (p.) Evaluation and Reports of Progress for information related to progress on the previous state plan goals and priorities.

For the current Combined State Plan, SCCB identified gaps from two primary sources.

The first being unmet gaps identified in the FFY 2016 Comprehensive Statewide Needs Assessment. The second source is the South Carolina Workforce Development Board's Economic Analysis and Strategic Plan. The following gaps have been identified:

Gap 1: South Carolina's current labor force, including individuals who are blind or visually impaired, do not have industry recognized credentials, knowledge, skills, or abilities to meet current or emerging demands of the business community.

Gap 2: SCCB needs to improve alignment of policies, resources, and staff expertise to provide job driven, labor market informed, vocational counseling and guidance that aligns with South Carolina's Talent Pipeline Project and Sector Strategies initiatives to assist eligible consumers in accessing career pathways that lead to high and middle skill/income jobs in growth sectors.

Gap 3: SCCB needs to improve partnerships with business in order to more accurately identify current and future workforce needs of business and industry to support career pathways in growth sectors and improve services to business.

Gap 4: SCCB needs to improve marketing, branding, and engagement with business, consumers, and other workforce partners to increase awareness, improve partnerships, and increase effectiveness and efficiency of services leading to competitive integrated employment.

Based on these identified gaps, and in alignment with the South Carolina Workforce Development Board's Strategic Plan, SCCB establishes the following objectives. These objectives have been jointly developed and agreed to by the South Carolina Commission for the Blind Board and are in alignment with the Workforce Development Board's Strategies to Build a Competitive Workforce Plan.

Objective 1: Identify, invest and support blind and visually impaired job seekers in the attainment of industry recognized credentials and vocational training required for current and emerging jobs.

Goal 1.1: Provide comprehensive vocational rehabilitation services to youth and transition students resulting in the attainment of industry recognized credentials to obtain competitive integrated employment.

Strategy 1.1.1: Provide Pre-Employment Transition Services (Pre-ETS) through

the Career BOOST and Summer Teens Programs. In cooperation and collaboration with public schools these services include career exploration and counseling, self- advocacy skills training, work readiness training, work- based learning experiences, and exploration of post- secondary education and training.

Key Performance Indicator 1.1.1: Number Participants Completed

Strategy 1.1.2: Support the attainment of a High School Diploma, GED and/or SC Employability Credential through vocational counseling and guidance, assistive technology, coordination and collaboration with public schools.

Key Performance Indicator 1.1.2: Number Participants Completed

Strategy 1.1.3: Invest in, facilitate and support completion of Post-Secondary college and university vocational training.

Key Performance Indicator 1.1.3: Number Participants Completed

Goal 1.2: Provide comprehensive vocational rehabilitation services to job seekers who are blind or visually impaired resulting in the attainment of industry recognized credentials required for competitive integrated employment.

Strategy 1.2.1: Provide quality Adjustment to Blindness and Pre-Vocational Training at the Ellen Beach Mack Rehabilitation Center for Employment & Independence. Adjustment to Blindness Training includes: Orientation & Mobility (Independent Travel), Independent Living Skills, Braille Literacy, Employability Soft Skills, Basic Financial Literacy, and Psychosocial Adjustment to Blindness Counseling. Pre-Vocational Training includes: Basic Keyboarding, Basic Microsoft Office Suite Training, and Assistive Technology Training such as Computer Screen Readers, Text Magnifiers, Low Vision Aids, Etc.

Key Performance Indicator 1.2.1: Number Participants Completed

Strategy 1.2.2: Support the attainment of a High School Diploma, GED, and SC Employability Credential through vocational counseling and guidance, assistive technology, collaboration and technical assistance to adult education programs.

Key Performance Indicator 1.2.2: Number Participants Completed

Strategy 1.2.3: Invest in and support the completion of Post-Secondary vocational

training through career exploration, vocational counseling and guidance, assistive technology, tuition assistance, collaboration and technical assistance to colleges and universities.

Key Performance Indicator 1.2.3: Number Participants Completed

Objective 2: Align resources, policy, and strategies to continuously improve competitive integrated employment outcomes for blind and visually impaired job seekers.

Goal 2.1: Develop and enhance job seeker work readiness and soft skills.

Strategy 2.1.1: Provide Adjustment to Blindness and Pre-Vocational Training at the *Ellen Beach Mack Rehabilitation Center for Employment & Independence*. Adjustment to Blindness Training includes: Orientation & Mobility (Independent Travel), Independent Living Skills, Braille Literacy, Employability Soft Skills, Basic Financial Literacy, and Psychosocial Adjustment to Blindness Counseling. Pre-Vocational Training includes: Basic Keyboarding, Basic Microsoft Suite Training, and Assistive Technology Training such as Computer Screen Readers, Text Magnifiers, Etc.

Key Performance Indicator 2.1.1: Number Participants Completed

Strategy 2.1.2: Facilitate the BRIDGE Program Job Club (Building Readiness for Individualized Development of Gainful Employment) provides consumers who have completed the Adjustment to Blindness and Pre-Vocational Training at the *Ellen Beach Mack Rehabilitation Center for Employment and Independence* a paid work-based learning experience (internship) and job club activities to enhance employability and jump start job placement in their local community.

Key Performance Indicator 2.1.2: Number Participants Completed

Strategy 2.1.3: Summer Internship Program (SIP) provides college and university students with a paid summer internship in their field of study during their Sophomore, Junior and Senior year.

Key Performance Indicator 2.1.3: Number SIP Graduates

Goal 2.2: Enhance and improve job placement services and job support services for job

seekers who are blind or visually impaired.

Strategy 2.2.1: Increase job placement by Employment Consultants through talent acquisition services to business partners matching qualitied job seekers who are blind or visually impaired with current job openings.

Key Performance Indicator 2.2.1: Number Successfully Employed

Strategy 2.2.2: Provide Supported Employment (SE) utilizing the initial placement and job coaching provided on a short-term basis by an SCCB JOBS Specialist (Job Oriented Blind Service) with long term extended supports provided by another agency such as an employment network, state agency, or natural supports.

Key Performance Indicator 2.2.2: Number Successfully Employed

Strategy 2.2.3: Provide Customized Employment that includes intensive discovery of individualized skills, abilities, potential; and intensive customization of an existing job opening, creation of a job that fills an unmet need, and other customized options. SCCB provides Customized Employment through a qualified and trained JOBS Specialist (Job Oriented Blind Service).

Key Performance Indicator 2.2.3: Number Successfully Employed

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

Goal 3.1: Increase agency utilization of Labor Market Information and business relationships to inform career exploration, vocational goal setting, service provision, and job placement.

Strategy 3.1.1: Align career counseling, career exploration, and vocational goal planning with labor market information through the use of **The Career Index +.**

Key Performance Indicator 3.1.1: TCI+ Usage Report

Strategy 3.1.2: Employment Consultant engagement with business organizations including Chambers of Commerce, Society of Human Resource Management, and business relationship building.

Key Performance Indicator 3.1.2: Number Business Partnerships

Strategy 3.1.3: Engage and collaborate with WIOA core partner's business service coordination council to collaborate and coordinate business service efforts to include the blind and visually impaired labor market.

Key Performance Indicator 3.1.3: Number Business Partnerships

Goal 3.2: Increase and improve talent acquisition and talent retention services to business in support of employees who are blind or visually impaired.

Strategy 3.2.1: Provide Workplace Sensitivity Training Workshops and Accessibility Technical Assistance (TA) to business partners in order to facilitate the employment of people who are blind or visually impaired.

Key Performance Indicator 3.2.1: Number of Workshops/TA Services

Strategy 3.2.2: Provide Talent Acquisition Services to business partners by matching current open positions with qualified applicants who are blind or visually impaired, providing technical assistance in regard to assistive technology and reasonable accommodations.

Key Performance Indicator 3.2.2: Number Job Placements

Strategy 3.2.3: Provide Talent Retention Services to business partners by providing technical assistance, support, and training necessary for the business to retain an employee who is blind or visually impaired.

Key Performance Indicator 3.2.3: Number Successful Job Retentions

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

Goal 4.1: Improve **visibility and branding of SCCB** with job seekers who are blind or visually impaired, businesses seeking to diversify labor market talent pool, and other workforce partners to increase the awareness and effectiveness of SCCB services.

Strategy 4.1.1: Complete Rebranding & Promotional Materials.

Key Performance Indicator 4.1.1: Completed/Not Completed

Strategy 4.1.2: Attend and distribute branding materials at Community Health Fairs, Career and Job Fairs, and other Community Resource Education Events.

Key Performance Indicator 4.1.2: Number Attended by SCCB Staff

Goal 4.2: Improve the visibility of SCCB within the Workforce Development System.

Strategy 4.2.1: Enhance programmatic presence in SC Works American Job Centers through assigned liaison relationships with field staff, standardized colocation hours, infrastructure cost sharing, accessibility assessment technical assistance and implementation, and availability of program educational information.

Key Performance Indicator 4.2.1: Completed/Not Completed

Strategy 4.2.2: Enhance programmatic presence at South Carolina Workforce Development Board meetings to ensure that the needs of job seekers who are blind or visually impaired are represented.

Key Performance Indicator 4.2.2: Completed/Not Completed

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:

- (1) an evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified State Plan for the most recently completed program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.
 - (B) Describe the factors that impeded the achievement of the goals and priorities.
- (2) an evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.
 - (B) Describe the factors that impeded the achievement of the goals and priorities.

- (3) the VR program's performance eon the performance accountability indicated under section 116 of WIOA; and
- (4) how the funds reserved for innovation and expansion (I & E) activities were utilized.

SCCB Response: The following is an evaluation and report of progress on SCCB's goals from the most recently completed program year. The goals and priorities from the last Unified State Plan were:

Goal 1: Identify, invest and support blind and visually impaired job seekers in the attainment of industry recognized credentials and vocational training required for current and emerging jobs.

Goal 1.1: Provide comprehensive vocational rehabilitation services to youth and transition students resulting in the attainment of industry recognized credentials to obtain competitive integrated employment.

Goal 1.2: Provide comprehensive vocational rehabilitation services to job seekers who are blind or visually impaired resulting in the attainment of industry recognized credentials required for competitive integrated employment.

Report of Progress Goal 1: SCCB achieved significant progress on goal 1. In August of 2019, SCCB successfully completed the procurement process for the Career BOOST contract to deliver 4 out of 5 required Pre-ETS services in coordination with LEAs statewide. SCCB Transition Counselors serve all schools statewide and deliver Job Exploration Counseling, the fifth Pre-ETS service directly. Career BOOST is currently in an expansion phase in which additional services such as mentoring, Assistive Technology Training, and Braille are being added. These additional services will insure that students with visual disabilities will be equipped with the tools needed for credential attainment and competitive integrated employment. The number of students receiving Pre-ETS services has increased from approximately 10 in 2016 to 115 in 2019. SCCB has served several Potentially Eligible students during the previous year, most of who have opted to apply for SCCB services. 26 Students participated in Summer Teen 2019 and 15 students participated in summer work experiences. Transition Counselors continuously provide encouragement and support to facilitate graduation from high school and enrollment in post-secondary education. SCCB spent approximately 95% of Pre-ETS reserve funds and has strengthened partnerships with CRPs and LEAs statewide. SCCB has cohosted several Pre-ETS workshops, assisted with curriculum development, and provided technical assistance to Teachers for the Visually Impaired.

Beginning in 2019, SCCB VR Counselors participate in local workforce board meetings in order to develop employer relationships and facilitate job placement. 4 students graduated from the Summer Internship Program (SIP) which provides summer internships to college students. A total of 8 consumers graduated from the BRIDGE (Building Readiness through Individualized Development of Gainful Employment) job club program during the previous year.

Goal 2: Align resources, policy, and strategies to continuously improve competitive integrated employment outcomes for blind and visually impaired job seekers.

Goal 2.1: Develop and enhance job seeker work readiness and soft skills.

Goal 2.2: Enhance and improve job placement services and job support services for job seekers who are blind or visually impaired.

Report of Progress Goal 2: With partnerships and one-stop system engagement through infrastructure funding agreements, co-located offices and staff, center accessibility, and staff cross-training, SCCB has demonstrated its commitment to WIOA state partnerships. SCCB staff continue to make referrals to American Job Centers to facilitate job placement, however, SCCB consumers require substantially more support than they are offered at these centers; therefore, SCCB staff continue to assist with completing job applications, facilitating job searches, and providing Customized employment and Supported Employment services. SCCB negotiated and entered into a number of Cooperative Agreements with community based qualified fee-for-service job coaching vendors and is exploring partnerships with job placement vendors to increase capacity and speed up delivery of job placement and job coaching services. As a portion of the Ellan Beach Mac Rehabilitation Center's strategic plan, SCCB has implemented a consumer orientation process to emphasize employment and job readiness services. Several Rehab Center courses were rewritten with a focus on employment in order to better prepare consumers for the world of work and VR Counselors are Aligning career counseling, career exploration, and vocational goal planning with labor market information through the use of The Career Index +. SCCB staff continue to provide technology consultation to American Job Centers to ensure that SCCB consumers have access. The Training and Employment Department has developed several key employer partnerships that provide consumers with valuable work experience and job opportunities.

One such notable partnership developed in 2019 is with Conduent call center located in Columbia. SCCB provides extensive Assistive Technology training and testing at the

Ellan Beach Mac Rehabilitation Center. Upon completion of training, and achievement of a passing score on an Assistive Technology proficiency test, consumers had the opportunity to interview with Conduent for call center opportunities. SCCB Training and Employment staff pre-screened consumers based on technology proficiency and job readiness and continue to provide follow up services to the consumer and employer after hire. Four consumers were hired through this program in 2019. SCCB is exploring development of additional job specific training programs across in-demand fields in the state.

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

Goal 3.1: Increase agency utilization of Labor Market Information and business relationships to inform career exploration, vocational goal setting, service provision, and job placement.

Goal 3.2: Increase and improve talent acquisition and talent retention services to business in support of employees who are blind or visually impaired.

Report of Progress Goal 3: Under the previous state plan, SCCB focused efforts on building program capacity, resources and expertise needed in order to meet goal 3. Under the provisions of the previous Unified State Plan, SCCB has aligned VR Counseling, career exploration, vocational goal selection, and Individualized Plan for Employment development with labor market information and sector strategies. SCCB has instituted the use of The Career Index Plus for analyzing labor market information and helping consumers make informed job driven decisions. SCCB implemented significant staff training in the area of using labor market information and understanding South Carolina's regional economic conditions. SCCB has established program capacity and resources to better serve individuals who have Most Significant Disabilities. SCCB has established JOBS Specialists who are providing Supported Employment and Customized Employment for the first time in SCCB's history. In addition, SCCB has hired and trained a Certified Work Incentive Counselor. SCCB established Career BOOST, a contractual program in partnership, collaboration, and coordination with Independent Living Centers, the National Federation of the Blind, and South Carolina's Local Education Authorities. This program provides the required Pre-Employment Transition Services to eligible and potentially eligible students with disabilities. SCCB VR Counselors and Employment Consultants participate on local workforce boards in order to develop relationships that will improve employment outcomes for consumers. SCCB VR Counselors have provided job retention services to both consumers and employers.

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

Goal 4.1: Improve visibility and branding of SCCB with job seekers who are blind or visually impaired, businesses seeking to diversify labor market talent

Goal 4.2: Improve the visibility of SCCB within the Workforce Development System.

Report of Progress: Although SCCB has made significant progress on goal 4, much work remains. SCCB had recently hired a Director of Communications who will assist with marketing and branding to businesses and consumers. SCCB's BRIDGE program has made significant strides over the previous year and has assisted SCCB with gaining visibility in the workforce system. SCCB has over 200 employer relationships and staff forge new contacts daily. SCCB provides sensitivity trainings, technology consultation, and job retention services to employers and consumers, however, employers are often hesitant to hire SCCB consumers. Job applications are not always in accessible formats, and employer software is most often incompatible with screen reading and screen magnification software. For this reason, SCCB consumers continue to face barriers to employment despite SCCB's interventions.

- (q) Quality, Scope, and extent of Supported Employment Services. *Include the following:*
 - (1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.
 - (2) The timing of transition to extended services.

Report of Progress: SCCB plans to expend Supported Employment revenue during FFY 2020 for the first time as JOBS Specialists were on boarded and began providing services. Thus far, no supported employment placements have occurred in order to expend SE funds, but SCCB is hopeful that placements will result from dedicated staff and training of staff. Thus far no consumers served by Supported Employment funds have been transitioned to extended services, but SCCB did sign a Partnership Plus Agreement with Able SC to provide on- going supports at the time when a consumer transitions from VR support. Building a quality Supported Employment program is a continued goal of SCCB for FFY 2020. Currently SCCB is undergoing extensive Customized Employment training and technical assistance to build capacity and program

effectiveness. SCCB is seeking external vendors to develop partnerships to increase capacity for Supported Employment and solicitations are being developed for this purpose.

Jobs for Veterans State Grant Program

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS 200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG will operate on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

Employment, Training and Job Placement Services

The state will provide employment, training, and job placement services to veterans and eligible persons in accordance with the Jobs for Veteran's State Grant (JVSG) by:

- targeting services to veterans and eligible persons with significant barriers to employment (SBE),
- placing Local Veterans Employment Representatives (LVER) staff throughout the state to reach out and promote the benefits of hiring veterans to employers, and
- developing strategies within the business service team which facilitate the promotion of increased employment of veterans.

Eligible veterans and spouses defined as having a SBE include:

- A special disabled or disabled veteran, as those terms are defined in 38 USC §421(1)(3); special disabled and disabled veterans are those:
 - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
 - o were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence;
- A recently-separated service member, as defined in 38 USC §4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3(36)).

Additional veteran populations identified by DOL as eligible for DVOP services include:

- Veterans aged 18-24—veterans who may possess limited civilian work history which can make transitioning to the civilian labor force difficult, and thus may benefit from individualized career services provided by a DVOP specialist.
- Vietnam-era Veterans—eligible veterans who served any part of their active military, naval, or air service during the Vietnam era. The Bureau of Labor Statistics and the Veterans Affairs data indicate that there are still a sizable number of Vietnam-era Veterans in the workforce, and many face difficulty in finding and maintaining employment. The Vietnam-era falls within the following timeframes:
 - The period beginning on February 28, 1961, and ending on May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period; and
 - o The period beginning on August 5, 1964, and ending on May 7, 1975, in all other cases.
- Eligible Transitioning Service Members, Spouses, and Family Caregivers—in annual appropriation bills since the Consolidated Appropriations Act of 2014, Congress has authorized the JVSG program to support individualized career services to:
 - o Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
 - o Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTFs) or warrior transition units (WTUs); and
 - o The spouses or other family caregivers of such wounded, ill, or injured members.
 - The term "caregiver" with respect to an eligible veteran means an individual who provides personal care services to the veteran.
 - The term "family caregiver" with respect to an eligible veteran means a family member who is a caregiver of the veteran.
 - The term "family member" with respect to an eligible veteran means an individual who (a) is a member of the family of the veteran, including parent, spouse, child, step-family member, and extended family member; or (b) lives with, but is not a member of the family of the veteran.

Veterans who do not fall into one of the categories that are served by DVOP specialists are eligible to be served by non-JVSG SC Works staff on a priority basis.

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with veteran service organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving veterans in need and helping them with the purpose of providing intensive services so they are able to successfully compete in the job market. South Carolina Department of Employment and Workforce acknowledge that homeless veterans are not likely to seek our services on their own and that an "under the bridge" approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees (Such as Fast Forward), VA facilities, Warrior Transition Units (WTU) and other community based organizations involved with assisting the homeless veterans population etc., direct partnerships have been established where the DVOP will visit the facility weekly (In the case of Fast Forward, a DVOP is scheduled there once a week) to provide services as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific Intensive Services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment and document any current or potential

SBEs, then monitor them through the Case Management process. The Veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the Regional Manager, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

South Carolina will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed. The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the SCDEW.

LVER staff will be placed throughout the state to reach out to employers and promote the benefits of hiring veterans. One way this promotion process can be accomplished is by introducing employers to the immediate tangible benefits such as the Work Opportunity Tax Credit (WOTC) that is available to them when they hire Veterans. In addition to the tangible incentives they can get is the short and long range benefits gained from the intangible "soft skills" Veterans bring to the hiring table, teamwork, trainability, leadership, diversity in the workplace, and a host of others that are inherent to the military experience. By "showcasing" our Veterans, the LVER staff increases job opportunities for them.

Every effort is made to keep vacancies of staff positions down below the 60 day time frame as directed. The Veterans Program Coordinator (VPC) will ensure that the SCDEW's Department of Human Resources is aware of the unique funding stream of the JVSG and will keep all vacancies filled within the 60 day mandate.

SCDEW will ensure that all new hires for DVOP and LVER will attend NVTI for mandatory training within the required 18 month time period.

The advantage of hiring Veterans is a topic that needs to be presented to an employer on a consistent basis. South Carolina's American Job Centers (AJCs), through the Business Services Team (BST), will provide an effective conduit to promote Veterans to businesses as a sound and wise investment. Federal contractors and subcontractors are also targeted as companies that not only can benefit from the hiring of Veterans, but they are also informed about their responsibilities under the Office of Federal Contract and Compliance Programs (OFCCP) and Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) guidelines as well. This is done through our BST, which includes the Local Veterans' Employment Representative (LVER), the Local Area BST Leads, and Wagner-Peyser (W/P) staff, Local Workforce Development Area (LWDA) staff as well as the South Carolina Department of Employment and Workforce's Communication Department. All provide valuable information about promoting Veterans within a variety of venues including job fair participation, Chamber of Commerce meetings, Society of Human Resource Managers (SHRM) meetings, employer visits, public radio and television service spots and departmental brochures. Besides the benefits of hiring Veterans, employers are also informed about the assistance available to them at the AJC, such as the ability to conduct individual hiring fairs and notification of job opportunities to potential candidates.

Retention of our Veterans who received case managed services is accomplished through follow – up within 30 days of initial hire between the individual Veteran and the employer by our DVOP staff. This gives both parties an opportunity to discuss potential issues before they escalate.

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current quidance;

Duties Assigned to DVOP Specialists

Primary Duties: Intensive Services. The DVOPs are assigned to the local AJC for the main purpose of providing intensive services to Veterans and others that are eligible with SBEs through case management. This is the key component of the roles and responsibilities of the DVOP.

After the initial assessment of a Veteran in the AJC (Conducted by other than DV/LV staff) and it is determined that they have an SBE and require additional Intensive Services, they will be referred to a DVOP for assistance. To accomplish effective intensive services, the DVOP must, at a minimum:

- a. Conduct an assessment of individual needs.
- b. If appropriate, develop a documented plan of action for periodic review.

These two activities form the core of an effective individual Case Management plan under which most Intensive Services will be delivered.

Upon completion of assessment, the DVOP can determine the need for additional Intensive Services through case management. These services can take the form of:

- a. Providing vocational guidance and counseling as required, such as; skills assessment, career planning, communications skills, interviewing skills, punctuality, personal maintenance skills and professional conduct.
- b. Coordination of supportive services by:
 - 1. Providing technical assistance to community based organizations regarding employment and training services to veterans.
 - 2. Developing relationships with VSOs and consulting with other representatives of federal, state, and local programs in order to provide maximum employment assistance.
- c. Job referral for specific employment opportunities.
- d. Referral to training with other agencies.

The DVOP will provide services to Veterans who have been identified as having an SBE that requires additional enhanced services through case management consistent with VPL's 03-14, Change 1, Change 2 and VPL 03-19. These include: A special disabled or disabled veteran, as those terms are defined in 38 USC §421(1)(3); A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence; A recently-separated service member, as defined in 38 USC §4211(6), who has been unemployed for 27 or more weeks in the previous 12 months; An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration; A veteran lacking a high school diploma or equivalent certificate; or A low-income individual (as defined by WIOA Section 3(36)).; Veterans aged 18-24; Vietnam-era Veterans; and Eligible Transitioning Service Members, Spouses, and Family Caregivers. Under the guidance of the WIOA and the integration of all partners within the AJC, the DVOPS will provide intensive services under a case management strategy to RESEA, SNAP E&T and TAA veteran clients who have been assessed by AJC partner staff and identified as having SBE.

Duties of LVER Staff

Primary Duties: The LVER will actively advocate for employment and training opportunities with business, industry, and community based organizations on behalf of Veterans consistent with VPL 03-14. LVERs will be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans and will be part of the "Business Services Team" within the AJC that conduct outreach activities to these entities. The following activities will be part of this program:

- a. In conjunction with employers, conduct job searches and workshops and establish job search groups to facilitate the use of the SCDEW labor exchange system to enhance their employee search activities.
- b. Form effective relationships with the business community and trade unions to enhance the availability of employment and training opportunities for Veterans.
 - 1. Encourage businesses to hire Veterans and to provide OJT and Apprenticeship programs geared to the Veteran community.
 - 2. Maintain current labor market information on trends and adjust strategies accordingly.
- c. Work with training providers and credentialing bodies to promote opportunities for Veterans.
 - 1. Encourage employers in professions requiring licensure or certification to develop OJT and/or apprenticeship programs for Veterans.
 - 2. Promote the participation of Veterans in programs leading to certification or licensure.
 - 3. Advocate with training providers and credentialing agencies for recognition of equivalent military training.
- d. Plan and participate in job fairs to provide employment opportunities for Veterans. The LVER will facilitate this by:
 - 1. Initiating contact and developing relationships with employers, community leaders, labor unions, veterans' organizations, and training program representatives to develop their commitment to providing employment and training opportunities for Veterans.
 - 2. Maintaining current information regarding a full range of employment and training options available to Veterans.
- e. Work with federal contractors to inform them of the process they can use to recruit and hire Veterans within the SCDEW Labor Exchange System and discuss their responsibilities under the OFCCP and VEVRAA final rule to attain the appropriate percentage of Veteran hires. The net result of LVER outreach to employers and the community will be an increased awareness of the capabilities of Veterans and their qualifications, along with developing employers' willingness to utilize the OJT program that is available to them to increase the opportunity for Veterans.

Integration of DVOP specialists and LVER staff

Integration into the Workforce System: Integration of the DVOP via the AJC will be accomplished by utilizing in-place procedures for servicing Veterans with SBEs and combining them with the new policies and processes that will support functional alignment within the AJC. All partners will work together to support our plan for a seamless, customer-driven system. This process starts at the initial point of entry into the AJC where the first person that the Veteran encounters will be an intake specialist who is trained in all aspects of the AJC and the services that are available to the Veteran. SCDEW calls this an "Initial Triage" step. Through the use of a specialized checklist and direct questions, a determination will be made for the level and type of needed service. If the Veteran, or other eligible person, is deemed to have an SBE and has a need for enhanced services, the Veteran will be referred to a DVOP for assistance. If the initial screener decides that the level of service precludes the need to see a DVOP, the person will be referred to a non-JVSG staff member for the required assistance.

Note: Veterans with an SBE, or labeled in a specified category, will have access to all appropriate AJC services and are not limited to receiving services only from DVOP specialists. Once the Veteran is made "Job Ready", the DVOP will coordinate with the BST (this team is responsible for all outreach to employers and includes the LVER) to ensure that these Veterans are promoted within the community as available for immediate job placement.

(d) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

Incentive Award program

SCDEW has elected not to accept the incentive award.

(e) The populations 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; or veterans in remote rural counties);

Populations of Veterans to be Served

Disabled Veterans Outreach Program Specialists (DVOPs) within the South Carolina Department of Employment and Workforce (SCDEW) will specifically service Veterans within all categories that have been identified as SBEs as defined by VPL's 03-14, Change 1, Change 2 and VPL 03-19. These include

- Veterans with a compensable disability; Homeless (As defined by Section 103(a) of the Stewart B. McKinney Homeless Assistance Act);
- A special disabled or disabled veteran, as those terms are defined in 38 USC §421(1)(3); special disabled and disabled veterans are:
 - o A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 USC 11302(a) and (b)), as amended, to include domestic violence and other dangerous or life-threatening conditions affecting permanent residence;
 - O A recently-separated service member, as defined in 38 USC §4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
 - o An offender, as defined by the Workforce Innovation and Opportunity Act Section 3(38), who is currently incarcerated or who has been released from incarceration;
 - o A veteran lacking a high school diploma or equivalent certificate; or
 - o A low-income individual (as defined by WIOA Section 3(36)).
- Veterans aged 18-24;
- Vietnam-era Veterans; and
- Eligible Transitioning Service Members, Spouses, and Family Caregivers

DVOPs are required to take an active role in seeking out and assisting these targeted groups by networking with other local, state, and federal government agencies. DVOPs also develop partnerships with Veteran Service Organizations, community service organizations, LWDA partners, faith based organizations, and any other entities that are dedicated to locating and serving Veterans in need and helping them with the purpose of providing intensive services so they are able to successfully compete in the job market. SCDEW acknowledges that homeless Veterans are not likely to seek our services on their own and that an "under the bridge" approach is to be taken by DVOPs, encouraging them to go where these individuals can be found. In locations where there is access to organizations such as US DOL Homeless Veterans Reintegration Program (HVRP) grantees (Such as Fast Forward), VA facilities, etc., direct partnerships have been established where the DVOP will visit the facility weekly (In the case of Fast Forward, a DVOP is scheduled there one day a week) to provide services as needed.

The goal is to help the Veteran become job ready and gain employment in a field of their interest and/or ability. Veterans who are identified as having SBE through the initial intake process at the AJC, and need specific Intensive Services, will be referred to appropriate DVOP staff for assistance as required. The DVOP and the Veteran will work together to complete a career assessment and document any current or potential SBEs, then monitor them through the Case Management process. The Veteran would then, if required, be referred to an appropriate partner for additional services as needed. In the absence of DVOP staff, the LOFF Manager, or other W/P staff, assumes responsibility for the career assessment of the individual and assures that appropriate referrals and services are provided. DVOPs are a supplement to the AJC staff and should not be a substitute for providing services.

South Carolina will continually monitor and assess the performance data of services provided to ensure that the roles and responsibilities of both the DVOP and the LVER are adhered to and determine if adjustments to the program are needed. The Quarterly Manager's Reports, along with onsite office validations and desk audits, will be used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the SCDEW.

(f) How the State implements and monitors the administration of priority of service to covered persons. Priority of Service for Veterans

Priority of Service (POS) as required by 38 U.S.C. 4215 (b) and 20 CFR parts 1001 and 1010, is an essential element given to covered persons (Veterans and other eligible persons including spouses who meet the criteria for POS) who participate in the Labor Exchange system. All covered persons are to receive POS at any "point of entry", which includes physical locations, such as AJCs, as well as websites and other virtual service delivery resources. Additionally, POS is provided within the AJC interviewing process to include career assessment and counseling, access to job search tools like the Internet, availability of classes to improve marketability such as resume writing and job interviewing programs and referral to all new and existing job training programs offered as a matter of course in the daily operations of the SCDEW's Labor Exchange System.

The term "Eligible Veteran" refers to a person who:

- a. Served on active duty for a period of more than 180 days and was discharged or released from the service with any classification other than dishonorable;
- b. Was discharged or released from active duty because of a service connected disability;
- c. As a member of a Reserve or Guard component under an order to active duty, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.
- d. Also includes VR&E, Chapter 31 participants, Native American Veterans and other such groups as targeted for special consideration.
- e. It is of critical importance that Priority of Service be observed in all employment and training activities within our purview. Priority of Service is the vehicle by which service to Veterans will be carried out. Priority of Service does not mean exclusivity of service. It does mean that if a veteran meets the basic qualifications for any Employment and Training program, he/she will be given priority in referral and enrollment into said program over a non veteran of equal qualification. A Veteran does not qualify for a program simply because they are a Veteran, unless being a Veteran is the basic criteria for the program.

(g) 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 program for eligible veterans and eligible persons;

Delivery of Career Services, Employment Placement Services, and Training and Placement Services

Employment Outlook for Veterans

The employment outlook for Veterans in South Carolina is expected to be above that for their civilian counterparts. Continued technological advances in military equipment and the requisite training to operate and maintain this gear make Veterans highly competitive in a broad spectrum of markets. A lack of required (Healthcare, CDL, etc.) certification because of "State Mandated" formal educational training remains a challenge for some Veterans in certain career fields. South Carolina currently offers a CDL waiver for veterans. However, programs like the Post 9/11 GI Bill and the Transition Assistance Program, along with proposed state legislative action to allow for the use of military schooling to be used in lieu of in state instruction, are dealing with these difficulties and provide opportunities along with information and training to enhance the accreditation process for recently separated Veterans in a variety of career fields. The "Soft skills" Veterans possess also make them desirable to potential employers and include; leadership, a strong work ethic, team work, loyalty and a desire to succeed, just to name a few.

Employment Opportunities for Veterans

The latest statewide industry employment projections cover the 10-year period 2016-2026. Overall, all industries are projected to grow by 11.9 percent or by 245,900 jobs. Health Care and Social Assistance; Administrative and Support and Waste Management; and Accommodation and Food Services are each expected to increase employment by over 25,000 jobs. Over the period, Health Care and Social Assistance is projected to take over the top spot in industry employment from Retail Trade, which would be the second largest in 2026. Accommodation and Food Services and Manufacturing and would be in third and fourth places, respectively. These are all areas of growth, as well, specifically for our veteran and eligible spouse population.

Because of the increase in age of the general population the health care sector will continue to expand in South Carolina as well. Providing a wide variety of job opportunities for Veterans such as EMT, medical, IT, etc.

To aid in the growth of these industries, South Carolina is making grant money available through the South Carolina Department of Employment for job development to assist these companies with the training and placement of employees, including Veterans for these highly desired jobs. Programs such as On the Job Training (OJT) and the Incumbent Worker Training Program (IWT) are just two examples of funding assistance available to them.

h) The hire date along with mandatory training completion dates for all DVOP specialist and LVER staff. Hiring and Training for DVOD and LVER Staff

Every effort is made to keep vacancies of staff positions down below the 60 day time frame as directed. The Veterans Program Coordinator (VPC) will ensure that the South Carolina's Department of Human Resources is aware of the unique funding stream of the JVSG and will keep all vacancies filled within the 60 day mandate. SCDEW will ensure that all new hires for DVOP and LVER will attend NVTI for mandatory training within the required 18 month time period.

i) Such additional information as the Secretary may require.

Additional Information

Not applicable.

SOUTH CAROLINA

SNAP Employment and Training Plan

Federal Fiscal Year 2020

8/6/2019 Revised 9/24/19



HENRY McMASTER, GOVERNOR
MICHAEL LEACH, STATE DIRECTOR



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Section A: Cover Page and Authorized Signatures

State: South Carolina

State Agency: South Carolina Department of Social Services

Federal FY: 2020

Date: 8/6/19

<u>Primary Contacts:</u> Complete the table with the name, title, phone and email address for those State agency personnel who should be contacted with questions about the E&T plan. Add additional rows if needed.

Name	Title	Phone	Email
Tammy James	Director, Division of	(803) 898-1097	Tamara.James@dss.sc.gov
	Employment Services		
Deborah Reed-Cole	Employment & Training	(803) 898-5137	Deborah.Reed-Cole@dss.sc.gov
	Program Director		2.1

Ce	rtif	ied	By:
~ c	1 411	ıcu	DY.

State Agency Director (or Commissioner)

Date

Certified By:

State Agency Fiscal Reviewer

Date

Section B: Assurance Statements Check box at right to indicate you have read and understand each statement	nt.
I. The State agency is accountable for the content of the State E&T plan and will provide oversight of any sub-grantees.	\square
II. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs.	Ø
III. State education costs will not be supplanted with Federal E&T funds.	Ø
IV. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program.	Ø
V. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.	Ø
VI. Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit.	Ø
VII. Contracts are procured through appropriate procedures governed by State procurement regulations.	Ø
VIII. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.	Ø
IX. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness.	
X. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.	Ø
XI. The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of State Plan which affect them; submit for comment all portions of the State Plan that affect the ITO; if appropriate and the extent practicable, include ITO suggestions in State plan. (For States with Indian Reservations only)	☑

By signing on the cover page of this document, the State Agency Director (or Commissioner) and financial representative certify that the above assurances are met.

Acronyms

SCCETS

Below is a list of common acronyms utilized within this plan:

ABAWD	Able-Bodied Adult without Dependents
E&T	Employment and Training
FFY	Federal Fiscal Year
FNS	Food and Nutrition Service
SNAP	Supplemental Nutrition Assistance Program
USDA	United States Department of Agriculture
SCDSS	South Carolina Department of Social Services

South Carolina Comprehensive Employment & Training System (Database)

I. Summary of the SNAP E&T Program

- Mission
- Scope of services
- Administrative structure of program

The South Carolina Department of Social Services (SCDSS) is the administering agency for the Supplemental Nutrition Assistance Program (SNAP). The mission of SCDSS is to serve South Carolina by promoting the safety, permanency, and well-being of children and vulnerable adults, helping individuals achieve stability and strengthening families.

SCDSS will operate a voluntary SNAP E&T Program in FY 2020 in all 46 counties of the state to assist SNAP recipients in securing employment. The goal of the program is to provide education and training activities for SNAP clients to increase their opportunities to obtain sustainable employment and reduce dependency on public assistance. This is accomplished through components that provide services in job search training, supervised job search, educational services, vocational training, work experience, workfare placements and job retention services.

South Carolina will not operate under any state waivers in FY 2020. In accordance with SNAP regulations at 7 CFR 273.24(f)(2), SCDSS will manage a voluntary program for Able-Bodied Adults Without Dependents (ABAWD).

Able-Bodied Adults Without Dependents (ABAWD) residing in South Carolina will continue to be subject to the ABAWD time limits. ABAWD individuals are limited to three months of SNAP benefits in a 36-month period unless they are working or participating in a qualifying work program for 20 hours per week.

SNAP recipients in all 46 counties listed below who are classified as ABAWDs will have the opportunity to participate in the E&T Program in FY 2020.

Abbeville	Aiken	Allendale	Anderson	Bamberg
Barnwell	Beaufort	Berkeley	Calhoun	Charleston
Cherokee	Chester	Chesterfield	Clarendon	Colleton
Darlington	Dillon	Dorchester	Edgefield	Fairfield
Florence	Georgetown	Greenville	Greenwood	Hampton
Horry	Jasper	Kershaw	Lancaster	Laurens
Lee	Lexington	McCormick	Marion	Marlboro
Newberry	Oconee	Orangeburg	Pickens	Richland
Saluda	Spartanburg	Sumter	Union	Williamsburg
Vork				

The SNAP E&T program has developed qualifying components to assist ABAWDs improve their chances of becoming employed by providing educational, training, and volunteer opportunities that will allow ABAWDs to remain eligible for SNAP benefits while pursuing self-sufficiency.

II. Program Changes

- New initiatives
- Significant changes in State policy or funding

South Carolina intends to continue developing the SNAP E&T Program in FY 2020 by enrolling additional Third-Party Reimbursement Program providers (TPRP) to further increase employment and training services available to SNAP recipients in the state. The participation and expenditure estimates for potential TPRP providers included in this submission are based upon data provided by organizations that have executed agreements with SCDSS to participate in this program or have agreements that are in processing at SCDSS at the time of submission of this plan. An amended State Plan of Operation may be submitted to FNS requesting additional funding and approval to include organizations that desire to participate as a partner agency in the TPRP but have not yet begun the process of executing an agreement with SCDSS.

As a recommended partner to WIOA, SNAP E&T will continue to strengthen partnerships with other recommended and required organizations under the WIOA umbrella. To accomplish this, SCDSS will continue to contract with the SC Works Centers (South Carolina's One-Stop delivery system) for dedicated and shared space in order to provide E&T services directly to SNAP recipients in the state's 13 comprehensive SC Works Centers. SNAP E&T Coordinators have been co-located in the comprehensive centers in order to provide collaborative services for SNAP recipients. Pursuant to this program change, the E&T Coordinators will be supervised by E&T state office personnel.

South Carolina will operate a mobile computer lab that will provide employment and training services throughout the state with a focus on bringing computer resources to SNAP participants living in the Opportunity Zone areas of South Carolina. The mobile computer lab will be used to support SNAP participants by providing full E&T program services.

The SC E&T program intends to implement an entrepreneurship program for SNAP participants. The entrepreneurship program will assist clients in the following areas:

- Developing a business plan
- Training/certifications
- Mentoring
- Licensing

Business supplies and equipment will be available as start-up funds based on the availability of funding.

Furthermore, SCDSS will expand existing partnerships with the Workforce Innovation and Opportunity Act (WIOA), businesses, other state entities, community and faith-based organizations, and technical colleges.

The employment and training services provided to participants in FY 2020 will include outreach, assessment, case management, job search training, supervised job search, workfare, work experience, basic adult education,

vocational training in a variety of short-term (less than one year) certificate/certification programs, job placement, job retention services and support services.

The SNAP Employment and Training program will continue to operate a Pathways Scholarship Program (PSP). Scholarships will be available to SNAP clients throughout the state for short term training and certification programs. Clients will have the opportunity to gain valuable training and receive industry-recognized competencies and credentials valued by employers. PSP will provide scholarships for tuition and books. These scholarships will be used to increase opportunities for obtaining sustainable employment. Priority will be given to clients residing in South Carolina's Opportunity Zones or areas with limited resources. The PSP program will have three phases of operation: soft skill development, continuing education/certification, and obtaining employment. Scholarship recipients must complete all eligibility criteria before a scholarship is granted.

The strategies of the South Carolina state plan are designed to provide opportunities and resources for all SNAP recipients. South Carolina will utilize a holistic approach which consists of an abundance of resources, opportunities, support services and case management in order to maximize the impact for successful completion of the program and acquiring gainful employment.

III. Workforce Development System

- General description
- In-demand and emerging industries and occupations
- Connection to SNAP E&T, components offered through such system, career pathways, and credentials available

South Carolina is extremely fortunate to have a collaborative system with support services, partnerships and proactive planning among all of the organizations who touch workforce, working in tandem to benefit jobseekers and employers.

In 2015, South Carolina formed a State Leadership Team which is co-chaired by the SC Departments of Commerce, Education, Employment & Workforce, and the SC State Technical College System. The Leadership Team is additionally comprised of: key executives from the SC Department of Social Services (representing both SNAP E&T and TANF), SC Vocational Rehabilitation, SC Commission for the Blind and other agencies involved in the South Carolina workforce development system; other public and educational stakeholder representatives from the state, regional, and local levels; and business and industry representatives, including those from targeted industry sectors. The Leadership Team meets monthly and provides social, political and intellectual power as leaders and stakeholders in the State's broader talent development system.

South Carolina submitted a WIOA Unified State Plan in April of 2016 covering the six WIOA core programs. The 2020-2024 WIOA state plan is due for submission in April of 2020. The State Leadership Team is currently assessing the suitability of submitting a Combined State Plan, which would cover the six WIOA core programs as well as, one or more WIOA required and optional partners, one of which is SNAP E&T. This inclusion of SNAP

	T Program, Operations and Policy Overview
	E&T in a Combined State Plan is strategic in that pairing E&T with state-level investments adds increased opportunities for co-enrollment and ultimately, increased resources to SNAP E&T participants. Alignment of SNAP E&T with these other programs and services provides additional supports and wraparound programming to better enhance employment outcomes.
	South Carolina's SC Works Centers provide tax-funded employment and training services for employers and job seekers. These centers offer a coordinated local employment and training service delivery system. The SC Works Centers provide the following core services: • A computerized listing of job openings • Assistance with job search skills • Testing and assessment • Information on workforce development support services • Information on careers, jobs and labor markets
	 Information on education and training programs Links to the unemployment insurance system WIOA registration Job search, job search training Collaborative approaches with partner organizations
	The SC Works Centers will provide employment and training workshops and job search opportunities for ABAWDS. These activities can be used to supplement the number of hours needed for the ABAWD work requirement. WIOA-funded training is also offered at the SC Works Centers.
IV. Other	Target or emerging industries in South Carolina are health care, construction, computer technology, truck driving and manufacturing.
Employment Programs TANF, General	Project Hope, WIOA, and the programs under the SC Fathers and Families umbrella are work programs that will provide assistance to SNAP clients in South Carolina. The South Carolina SNAP E&T Program will coordinate with other existing employment programs, including TANF and WIOA, to enhance services available to E&T participants.
Assistance, etc. Coordination efforts, if applicable	
V. Consultation with Tribal Organizations Description of	SCDSS contacted the Director of Family Services and the Vocational Coordinator at the Catawba Indian Nation in Rock Hill, South Carolina during FY 2019. Program information was provided to both individuals. A meeting has been scheduled for Oct 1, 2019 for a collaboration of services.
consultation efforts • Services available through E&T	In previous years, SCDSS has consulted with the Catawba Nation in South Carolina and provided information regarding the Employment and Training program. SCDSS informed the Catawba Nation representatives of the availability of services for Native Americans living on the reservation.

Section C: State E&T	Program, Operations and Policy Overview
	SCDSS has offered the Catawba Nation full access to all E&T programs in South Carolina. The E&T services offered are as follows: outreach, assessment, case management, job search training, job search, workfare, work experience, basic adult education, vocational training in a variety of short-term certificate programs, job placement, job retention services, Pathways scholarships and support services.
VI. State Options • Select options the State is applying	 □ Serving applicants □ Serving zero-benefit households □ Serving mandatory participants only □ Serving mandatory and voluntary participants ☑ Voluntary participants only
VII. Screening Process • Process for identifying whether work registrant should	SCDSS eligibility staff are responsible for all actions related to determining SNAP eligibility including: intake, certification, and recertification. Upon the approval of an initial SNAP application or annual recertification, SCDSS eligibility staff will notify SNAP recipients about the availability of the E&T Program.
be referred to E&T	During the application process the eligibility worker determines if a client meets the eligibility criteria to receive SNAP benefits. Once eligibility has been established the applicants are screened to determine if the client meets any Work Registration exemptions. If the client does not meet an exemption, the worker codes them as a Work Registrant (WR). The worker then determines if the applicant meets an ABAWD exemption. If the client does not meet an exemption, the client is coded as an ABAWD and is sent an approval notice that informs them of their ABAWD status and the work requirements associated with receiving SNAP benefits for more than three months. The letter also informs the client of various participation options in order to meet the work requirement. The SNAP E&T program is one of the options available to an ABAWD to meet the work requirement. All WRs receive notification about the SNAP E&T program.
	A SNAP recipient is referred (either by an employee of SCDSS or by his/herself) to the SNAP E&T program. The process to enroll in the SNAP E&T program is as follows: • Client attends an orientation where eligibility is confirmed; • Client signs a voluntary agreement;
	 Client assessment is completed; Client employment plan is completed; Client receives job search training; Client is entered into and participates in a component or referred to a training provider; and Client is enrolled in the SCDSS E&T Program.

VII. Conciliation Process (if applicable) • Procedures for conciliation	N/A
 IX. Disqualification Policy Length of disqualification period Sanction applies to individual or entire household 	First Occurrence: For the first occurrence of noncompliance, the individual will be disqualified until: One month; and The date the individual agrees to comply, as determined by the Agency. Second Occurrence: Three months; and The date the individual agrees to comply, as determined by the Agency. Third or Subsequent Occurrence: Six months; and The date the individual agrees to comply, as determined by the Agency. Sanction applies to: (Work Registrants) As defined in the SNAP Manual, Chapter 8, a nonexempt individual who refuses or fails without good cause (as defined in Section 8.10, Good Cause) to comply with the SNAP work requirements (listed under Section 8.1, Work Requirements) is ineligible to participate in SNAP, and will be considered an ineligible household member.
K. Participant Reimbursements List all participant reimbursements (or link to State policy/handbook) Reimbursement cap Payment method (in advance or as reimbursement)	Participant reimbursements often make the difference between continued unemployment and the participant's ability to get a job or participate successfully in the E&T Program. SNAP recipients who volunteer to participate in the E&T Program are also eligible for participant reimbursements; however, priority for the limited participant reimbursement funds will be granted to ABAWDs. Each county has developed a process to provide participant reimbursements to SNAP recipients. The method used by counties may vary from purchasing bus tickets in bulk, gas cards or by providing funds directly to clients. Transportation assistance funding is limited to a maximum of \$75 monthly per participant. Reimbursements may also be provided up to \$100 for one-time component related expense resulting from E&T participation in an allowable activity. Examples of this would be uniforms or work tools needed to participate in a component. This reimbursement may only be provided one time each federal fiscal year per participant. Payments may be made directly to the SNAP E&T participant or directly to providers.

attending certification programs through the SNAP E&T Third Party Reimbursement Program.

Rent assistance is available for E&T program participants in danger of being evicted while participating in an allowable component in the SNAP E&T program based on the availability of funds. The maximum assistance will be up to \$1,000 for this one-time (lifetime) support service.

Child care will be available on a limited first come first serve basis for SNAP recipients with children while participating in the E&T program. Eligible children must also be in the SNAP household budget. The state agency will provide child care for all E&T participants. Child care will be available on a limited first come, first served basis for SNAP E&T participants with children. Eligible children must also be in the SNAP household budget. Additionally, TPRP agencies can receive reimbursements for dependent care costs.

Oversight of the reimbursements are tracked and monitored through the SCDSS' Family Independence Financial System (FIFN). FIFN records reimbursements paid to providers by the provider and the participant. Reports are generated from this system monthly.

South Carolina's support service budget is \$450,000 for FY 2019-2020. This amount is sufficient based on historical data. The budget will be monitored monthly, however, if funds become insufficient to complete the entire fiscal year, South Carolina will request additional funding.

Third Party Reimbursement Program partner agencies can request reimbursement for dependent care costs.

XI. Work Registrant Data

 Methodology used to count work registrants SNAP eligibility staff will determine each individual's eligibility and work registration status at application and recertification. During these interviews, eligibility staff will discuss and record the work registration status of each household member and advise the household of work registration requirements and penalties. A determination will be made to identify work registrants who are ABAWDs and under the time limited eligibility requirements. The determination of a participant's status is based on information provided and verified during the intake process. ABAWD work registrants will be provided an explanation of their rights and responsibilities and the requirement to either work or participate in a qualifying work program to maintain their eligibility.

In order to ensure an unduplicated count a report is generated to identify the number of Work Registrants in the state as of October 1st. New Work Registrants added during October and the remainder of the fiscal year are checked against the master list before being reported as a new Work Registrant to ensure an unduplicated count.

XII. Outcome Reporting Data Source and Methodology

- Data sources
- Methodology

South Carolina will gather monthly participation and outcome data to track participant involvement in the services provided by the E&T Program. Data collected will be used for federal reporting requirements as well as to evaluate the effectiveness of services being provided.

The following characteristics will be reported for all E&T participants:

- Whether the individual is a Voluntary or Mandatory participant
- Whether the individual is an Abled Bodied Adult Without Dependents (ABAWD)
- The participant's educational level prior to participating in the E&T program
- Whether the participant speaks English as a second language
- The participant's gender
- The participants' age within these ranges (16-17, 18-35, 36-49, 50-59, 60 or older)

A report from the South Carolina Comprehensive Employment and Training System (SCCETS) database will be used to report participant characteristics as outlined above.

The SCCETS will also be utilized to facilitate the reporting of component activity, participation hours and other pertinent management data. This information will be entered into the SCCETS database weekly/monthly by the E&T Coordinators and TPRP partner agencies statewide. The information will be retrieved by state office staff monthly.

Other reporting measures will be component-specific as follows:

- Number of clients participating in a particular component.
- Number and percentage of clients completing component (training, education, Work Experience, etc.).
- Number and percentage of client obtaining employment. Wages and hours of employment will also be required.
- Number and percentage of clients receiving certifications, GED or High School Diploma.

Partner agencies will monitor, document and report these outcome measures to SCDSS monthly using the SCCETS database. State office staff will generate a statewide report utilizing this information.

SCDSS has a data sharing agreement with the state's labor agency in order to obtain unemployment insurance wage record to assist in satisfying the federal quarterly reporting measures. The data will be used to report employment for the second and fourth quarters after a client completes the E&T program.

Section D: Pledge to Serve All At-Risk ABAWDs (if applicable) State agencies wishing to receive pledge funds should identify a desire to pledge and provide the following information:		
I. Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?	South Carolina will not operate an enhanced E&T Program for ABAWDs for FY 2020.	
II. Information about the size & needs of ABAWD population.	N/A	
III. The counties/areas where pledge services will be offered.	N/A	
IV. Estimated cost to fulfill pledge.	N/A	
V. Description of State agency capacity to serve at-risk ABAWDs.	N/A	
VI. Management controls in place to meet pledge requirements.	N/A	
VII. Description of education, training and workfare components State agency will offer to meet ABAWD work requirements.	N/A	

Section E: E&T Component Detail

Components by Category (Non-Education, Non-Work Components; Education Components; Work Components)

Non-Education, Non-Work Components

Supervised Job Search

Description

Supervised job search requires an E&T Program participant to make a specified number of job contacts. The job search begins on a date agreed upon by the E&T Program participant and E&T Coordinator. Only SNAP recipients who are deemed "work ready" will be placed in the supervised job search component. The job search period will typically begin after the completion of orientation and assessment activities.

SCDSS has approved the following locations for the supervised job search component for FY 2020.

- The South Carolina Works Centers (South Carolina's One-Stop delivery system). The SC Works Centers have physical locations that cover every county in South Carolina. SCDSS SNAP E&T Coordinators have been co-located in these centers and will have the responsibility to provide supervision for E&T participants engaging in the supervised job search component. E&T Coordinators also have the ability to track the timing and activities of the participants.
- Third-Party Reimbursement Program contracted partner agencies who provide job search activities will also be approved locations for the supervised job search component. These providers will be required to physically supervise, monitor and track all E&T participants' job search activities at their contracted sites/locations.
- ABAWDs can complete 20 hours of job search per week at the SC Works Centers
 utilizing the state's labor department's online employment system. Each job search
 (submitted job application) equals two hours of participation.

The SC Works locations were chosen as approved Supervised Job Search Sites for the following reasons:

- SC Works have computer lab locations statewide.
- SCDSS SNAP E&T Coordinators are housed at all of the comprehensive SC Works Centers statewide. The E&T Coordinators will be able to:
 - o schedule and supervise SNAP participants during their job search activities,
 - o evaluate to ensure job search activities are effective,
 - o provide case management to remediate barriers,
 - provide guidance to ensure participants are applying for positions for which they qualify,
 - provide regular contact with participants to evaluate outcomes (interviews or employment offers)
- E&T Coordinators have access to the SC Works Online System (SCWOS) which tracks job searches. All E&T participants are registered in SCWOS.
- SCWOS will track the timing and activities of all E&T participants.

TPRP sites that provide supervised job search were also chosen as approved Supervised Job Search sites and will be required to provide the same method of supervision as described above.

All supervised job searches will be limited to 30 days for each participant with a maximum of 60 days per year. The 60 days cannot be consecutive for the following reasons:

Supervised Job Search

- SNAP E&T participants can only participate in supervised job search for 30 days to allow E&T Coordinators and TPRP providers the opportunity to remediate any barriers to employment before exhausting the 60-day annual limit.
- If an E&T participant is unsuccessful after the initial 30 days of supervised job search, E&T Coordinators and TPRP providers can assist participants through referrals to additional E&T services as deemed necessary in order for the participant to be successful.
- E&T Coordinators and TPRP provider will provide case management services to monitor job search activities to ensure participants are marketable to potential employers.

Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
SNAP recipients	17% of the projected participation 59 Participants	\$23,673.76 Funds will be utilized to provide intensive case	SCDSS	Number and percentage of total supervised job search participants who obtain unsubsidized employment within the reporting period (FY2020)
	audience (e.g., homeless, re- entry population, ABAWDS)	audience (e.g., homeless, reentry population, ABAWDS) SNAP recipients Anticipated monthly participants (unduplicated count) 17% of the projected participation	audience (e.g., homeless, reentry population, ABAWDS) SNAP 17% of the projected participation Funds will be utilized to provide Anticipated monthly cost* Anticipated monthly cost* Anticipated monthly cost*	audience (e.g., homeless, reentry population, ABAWDS) SNAP recipients 17% of the projected participation Funds will be utilized to provide intensive case Anticipated monthly cost* Provider(s) Provider(s)

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Job Search Training

Description

Job search training will provide meaningful assistance to SNAP recipients helping to improve their ability to get a job. Job search training activities will be conducted locally based on the available resources and will be designed to meet the needs of job seekers and employers.

Activities may include, but are not limited to: employability skills, interpersonal skills, basic job search skills, job retention skills, interviewing skills, appropriate dress, resume development, career assessments, guidance, and motivation for development of positive work behaviors necessary for the labor market.

ABAWD participation in the job search training component will be limited to 9 hours per week. This component may be combined with other ABAWD qualifying components.

Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide	SNAP recipients	21% of the	\$29,244.05	SC Works	Number and percent of
	l	projected participation		SCDSS	total job search training participants who obtain
		73 participants	ĺ	TPRP Partner	unsubsidized
				Agencies	employment within
F 7 1 11 12 1	1 41			<u> </u>	the reporting period

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Job Retention Services Job retention services are a time-limited training and support process that assist the individual in Description assessing job needs and provides assistance and resources when a client gains employment after participating in another E&T component. South Carolina will allow up to 30 days of retention services per year regardless of number of times client participates in the employment and training program. Job retention services include but are not limited to: Counseling/Case Management Support services/Transportation Referrals to other services/Navigation Services Clothing required for employment Equipment or tools required for employment Test fees Licensing and certifications Target Anticipated audience (e.g., Reporting monthly Geographic homeless, re-Anticipated measure(s) if > 100 participants Provider(s) area entry monthly cost* participants per (unduplicated population, year count) ABAWDS)

Job Retention Services						
Statewide	SNAP recipients	2% of the projected participation 7 Participants	\$2,785.14 Funds will be utilized to provide intensive case management	SCDSS	Number and percent of total participants maintaining unsubsidized employment for 90 days within the reporting period (FY2019)	

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements

Education Components

Basic Education

Description

The basic education component is designed to increase employability by providing remedial and post-secondary education leading to a GED or certification.

SNAP clients may be referred to basic education activities that include adult basic and/or foundational skills instruction. This component will increase the participant's ability to perform math or other activities necessary for the attainment of a secondary school diploma or equivalent, transition to post-secondary education and training, and obtain employment

Educational expenses will not be paid for training that is normally available to the public at no cost.

E&T funds may be used only if:

- · Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education program costs are associated with E&T program engagement.

Education may be combined with job search, job search training, or other qualifying components.

Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide	SNAP recipients	28% of the projected participation 97 Participants	\$38,992.07	South Carolina Office of Adult Education	Number and percent of basic education participants who obtained GEDs, HS Diplomas or Work
				TPRP partner Agencies	Keys / WIN certifications within the reporting period (FFY2020)

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Career and Technical Education Programs (Vocational Training)

Description

This component provides vocational training or equivalent knowledge and skills required in a specific occupational area. The focus of the vocational training component will be the "Quick Jobs" program and other similar certificate and non-certificate programs which allow participants to quickly obtain skills matching the needs of local businesses and industries. Quick Jobs and other certificate programs have been developed for fields where job growth is expected and in consultation with local employers. The Quick Jobs program offers training and certifications with most courses lasting three months or less but all courses last less than one year.

Examples of Quick Jobs certificate and non-certificate programs include welding, manufacturing, information technology, healthcare, customer relations, and basic construction skills.

Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide	SNAP recipients	30% of the projected participation 104 Participants	\$41,777.22	SCDSS has entered into agreements with technical colleges	Number and percent of total career and technical education participants who obtain an industry recognized credential/ certification/certificate within the reporting period (FFY2020)

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Work Components

Description The workfare component is being offered in order to enhance the employability of program participants. Workfare provides individuals with an opportunity to gain work experience and useful workplace skills at a supervised worksite. In lieu of wages, workfare participants receive compensation in the form of their household's monthly SNAP allotment. Workfare may be combined with job search, job search training, or other components.

Worksites and worksite agreements are developed and executed by SNAP E&T Coordinators. Each county has signed an agreement with worksites that outlines requirements for working conditions and requires data exchanges such as reporting participation hours in the management information system. SCDSS' E&T program provides workman's compensation insurance for participants in the workfare program.

An individual may identify a worksite that has not yet been developed by the agency. However, the individual cannot be assigned to workfare at the worksite until an agreement with the site has been executed by the E&T Coordinator for the county involved.

Volunteer placements for the Workfare component are made at public, non-profit organizations.

Workfare					
The number of volunteer monthly hours needed for ABAWDs equal to the result obtained be dividing a household's SNAP allotment by the State's minimum wage.					
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Statewide	ABAWDs	1% of the projected participation 3 Participants	\$1,392.57	SCDSS	Number and percent of workfare participants who obtain unsubsidized employment within the reporting period (FFY2020)

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Work Expe		2000 00000 000 1 i=	h-i					
Description	Program participa	The work experience component is being offered in order to enhance the employability of E&T Program participants. SNAP E&T participants can volunteer to work in any agency or organization to gain work experience.						
	SNAP clients (Al with other activity) The majority of S Other participants This activity is de	BAWDs included) ies. SNAP clients assign s may need training esigned to increase	can volunteer for a ned to this compor g or are re-entering	up to 20 hous ent will have the job mar	l as for-profit agencies. All rs a week, alone or combined by the little or no work history. It after a long absence.			
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated	Anticipated monthly cost*	Provider (s)	Reporting measure(s) if > 100 participants per year			
	ADA WDS)	count)			100 participants per year			

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

I. Anticipated number of work registrants in the	
State during the Federal FY (unduplicated count):	165,797
II. Estimated Number of Work Registrants Exempt	103,797
from E&T	100%
List below planned State option exemption	10078
categories and the number of work registrants	
expected to be included in each during the Federal FY	
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
(Add more rows as needed)	
III. Percent of all work registrants exempt from	
E&T (line II/line I)	100%
	10076
V. Anticipated number of mandatory E&T	
participants (line I – line II)	0
Anticipated number of voluntary E&T	
participants	4,142
I. Anticipated number of ABAWDs in the State	
uring the Federal FY	75,974
II. Anticipated number of ABAWDs in waived	
reas of the State during the Federal FY	0
III. Anticipated number of ABAWDs to be	
xempted under the State's 12 percent ABAWD	9,117
xemption allowance during the Federal FY	3,117
K. Number of potential at-risk ABAWDs expected	
the State during the Federal FY (line VI-(lines	66,857
II+VIII))	00,037

Partner/ Contractor	Nature of Contract (Consulting, Data Analysis, E&T Services, Other)	Total Admin Costs	Total Participant Reimbursements Costs	Total Cost	% of Total Budget
AIMHigh Education Technology	E&T Services	150,000.00	0.00	150,000.00	.0084
Butterfly Foundation	E&T Services	151,350.00	6,600.00	157,950.00	.0088
Charles Lea Center	E&T Services	84,738.90	8,065.20	92,804.10	.0052
Fast Forward	E&T Services	48,400.00	1,600.00	50,000.00	.0028
Florence Darlington Technical College	E&T Services	938,296.15	50,000.00	988,296.15	.0556
Goodwill Ind Middle GA &CSRA	E&T Services	71,855.49	10,750.00	82,605.49	.0046
Goodwill Ind Upstate/Midlands	E&T Services	131,108.10	11,792.00	142,900.10	.0643
Greenville Literacy Council	E&T Services	100,000.00	0.00	100,000.00	.0056
Hampton County Lit Council	E&T Services	10,700.00	300.00	11,000.00	.0006
Horry Georgetown Technical College	E&T Services	150,000.00	0.00	150,000.00	.0084
Northeastern Technical College	E&T Services	360,000.00	65,000.00	425,000.00	.0239
One80 Place	E&T Services	160,000.00	90,000.00	250,000.00	.0140
Orangeburg Calhoun Technical College	E&T Services	591,222.43	17,000.00	608,222.43	.0342
Palmetto Goodwill	E&T Services	448,141.44	60,000.00	508,141.44	.0286
Pilgrims Inn	E&T Services	81,500.00	98,500.00	180,000.00	1010.
Project Host	E&T Services	428,386.00	0.00	428,386.00	.0241
SC Dept. of Education	E&T Services	1,500,000.00	0.00	1,500,000.00	.0845
C Dept. of Education Fransportation Div. 100% Funds)	E&T Services	45,000.00	0.00	60,000.00	.0025

SC Works Centers (100% Funds)	E&T Services	100,000.00	0.00	100,000.00	.0056
Spartanburg Community College	E&T Services	726,972.00	25,000.00	751,972.00	.0423
Technical College of the Low Country	E&T Services	306,938.75	10,000.00	316,938.75	.0178
The Phoenix Center	E&T Services	57,900.00	11,400.00	69,300.00	.0039
Trident Literacy	E&T Services	216,377.05	17,423.00	233,800.05	.0131
United Ministries	E&T Services	136,578.53	3,250.00	139,828.53	.0078
WeKnowIT	E&T Services	549,533.00	2,500.00	552,033.00	.0311
Williamsburg Tech College	E&T Services	168,503.92	0.00	168,503.92	.0094

For each partner/contractor that receives more than 10% of the E&T operating budget, complete and attach a Contractor Detail Addendum.

Section H: Contractor Detail Addendum

Partner/Contract Name	10	
Monitoring and communication with contractor (s)		
Role of Contractor		
Timeline	Start	End
Description of Activities/Services		Esta +1)
Funding		
Evaluation		

Section I: Operating Budget and Budget Narrative

I Dimet C	State cost	Federal cost	Total
I. Direct Costs			
a) Salary/Wages	0	881,974	881,974
b) Fringe Benefits* Approved Fringe Benefit Rate Used49%		432,167	432,167
c) Contractual Costs (Admin Only)	7,568,502	7,713,502	15,282,004
d) Non-capital Equipment and Supplies	0	12,000	12,000
e) Materials	0	10,000	10,000
f) Travel	0	15,000	15,000
g) Pathways Scholarship	0	40,000	40,000
h) Equipment & Other Capital Expenditures	0	0	0
Total Direct Costs	7,568,502	9,104,643	16,673,145
II. Indirect Costs	, ,,,,,,,	-,101,013	10,073,143
Indirect Costs*Approved Indirect Cost Rate Used: %	0	134,948	134,948
III. In-kind Contribution			
State in-kind contribution	0	0	0
Total Administrative Cost (Total of items I, II, and III)	7,568,502	9,239,591	16,808,093
100 Percent Federal E&T Grant		1,671,089	1,671,089
50 percent Additional Administrative Expenditure	7,568,502	7,568,502	15,137,004
IV. Participant Reimbursement (State plus Federal):			
a) Dependent Care (including contractual costs)	0	0	0
b) Transportation & Other Costs (including contractual costs)	469,590	469,590	939,180
c) State Agency Cost for Dependent Care Services	0	0	0
Total 50 percent Participant Reimbursement Expenses	469,590	469,590	978,360
V. Total Costs	8,038,092	9,709,181	17,747,273

* Attach an approval letter from the cognizant agency identifying the indirect cost rate being used.

The South Carolina Department of Social Services does not use an indirect cost rate. SCDSS utilizes a cost allocation process.

Section J: Budget Narrative and Justification

Item	Narrative
I. Direct Costs	
a) Salary/Wages	One (1) Full Time E&T Program Director to provide oversight of overall program operation and supervision of State Agency SNAP E&T staff and coordinate activities with SNAP Program Director, E&T Coordinators and other State Agency staff as appropriate. Salary + Fringe = \$81,283 (100% Funds)
	Five (5) E&T Program Support Staff to monitor county reporting processes and compliance with SNAP E&T policy and procedures; collect and compile monthly participation data to support the submission of required federal reports; monitor participant reimbursement and ensure adequate funding is available consistently to support county operations; assist with management and evaluation reviews of county offices; manage special projects designed to enhance the operation of the E&T program, manage support services for SNAP recipients and provide supervision of staff assigned to special projects; manage the reimbursement process and other fiscal activity associated with the Third-Party Reimbursement Program (50/50 Program). Salaries + Fringe = \$315,230 (100% Funds)
	Fourteen (14) E&T Program Coordinators to develop and implement an employment and placement strategy for SNAP E&T participants for their geographic assignment area. E&T Coordinators interact with workforce development staff, employers and other partners to develop part-time and full-time employment and training opportunities for their participants.
	Salaries + Fringe = \$748,520 (100% Funds)
	Two (2) E&T Program Specialists responsible for operating and providing E&T services aboard the E&T mobile computer lab.
	Salaries + Fringe = \$119,200 (100% Funds)
	One (1) E&T Program Navigator assigned to provide technical assistance for Third-Party Reimbursement Program partner agencies. The Navigator will provide technical assistance with operating the SCCETS database, data entry, invoicing, orientations and training when needed.
	Salaries + Fringe = \$49,906 (100% Funds)
o) Fringe Benefits* Approved Fringe Benef Rate Used %	it .49

c) Contractual Costs	CODGG:
c) Contractual Costs	SCDSS is contracting with the state's SC Works Centers to co-locate E&T Coordinators in the comprehensive centers across the state. \$100,000 (100% Funds)
	SCDSS is seeking to contract with the SC Department of Education to organize and develop a bus driver training program. \$45,000 (100% Funds)
	SCDSS will contract with non-profit agencies, State agencies, technical colleges and for-profit organizations to provide Employment and Training services for SNAP clients.
	Providers \$7,568,502 Federal Funds \$7,713,502 Total Cost \$15,282,004
Pathways Scholarship Program (PSP)	Funds will be utilized to provide scholarships for tuition and books for SNAP recipients attending approved certification programs. \$40,000 (100% Funds)
d) Non-capital Equipment and Supplies	Funds will be utilized to purchase printers, ink cartridges and other needed office supplies. \$12,000 (100% Funds)
e) Materials	Funds will be utilized to purchase office supplies. Copy paper, pens, calendars, scissors, staplers and all other essential materials will be purchased for the operation of the Employment and Training Program. \$10,000 (100% Funds)
f) Travel	Frequent travel is required in order to effectively administer the Employment and Training Program in South Carolina. The E&T Coordinators are responsible for multiple counties. They travel daily in order to conduct orientations and case management for SNAP clients. The State office staff supervisory staff conducts announced and unannounced monitoring visits throughout the state which also requires a significant amount of travel. E&T staff must also travel for various meetings and trainings throughout the year. \$15,000 (100% Funds)
g) Building/Space	N/A
h) Equipment & Other Capital Expenditures	N/A

II. Indirect Costs	
Cost Allocation	These funds will be used for indirect cost associated with the administration of the SNAP E&T program (lights, telephone, office space, etc.). \$134,948 (100% Funds)
III. State In-kind Contribution	N/A
IV. Participant Reimbursements	
a) Dependent Care	N/A
b) Transportation & Other Costs	South Carolina will provide reimbursement funds for participants needing reimbursement for transportation in the amount of up to \$75 monthly during component participation. Reimbursement will also be provided for one-time component-related expenses in the amount of \$100 provided the participation occurred in a SNAP E&T component for that month. SNAP participants who have gained employment after participating in the E&T program can receive up to a maximum of \$125 if enrolled in the E&T job retention program. Note that funds for expenses and reimbursements may be paid directly to the provider or to the participant. Additionally, one time rent assistance will be available for E&T program participants in danger of being evicted. The maximum assistance will be \$1,000.00 for this one-time support service. Participant Reimbursement Costs: State \$200,000 State Revenue \$25,000 Federal \$225,000 Total Participant Reimbursement Costs: \$450,000 Third Party Reimbursement Program Participant Reimbursements Providers \$244,590 Federal \$244,590 Total TPRP Participant Reimbursement \$489,180
c) State Agency Cost for Dependent Care Services	N/A



FY 2020 South Carolina SNAP E&T State Plan Addendum - Agriculture Improvement Act of 2018 Implementation

Workforce Consultation and Coordination

- 1. Describe the efforts taken by the State agency to consult with the State workforce development board or with private employers or employer organizations, if appropriate, in designing the State's SNAP E&T program. This description should include whom the State agency consulted.
- 2. Describe the extent to which the State agency is carrying out SNAP E&T programs in coordination with Title I programs under the Workforce Innovation and Opportunity Act (WIOA).

Across South Carolina, workforce development, education, and economic development systems share a common vision for building a skilled talent pipeline that meets the current and future needs of business and industry, and connects South Carolinians to jobs. To underscore this vision, a core partner work group was implemented to share information and to collectively work toward system improvements. While this work group was initiated for WIOA core program representation, SNAP E&T is also represented. Examples of the groups' initiatives include the development and issuance of guidance to the local areas on the development and negotiation of MOU/IFAs; state plan modifications; interagency staff training; and aligning the state plan with the State Workforce Development Board's strategic plan. All of these initiatives are accomplished through consultation with the State Workforce Development Board. In South Carolina, SNAP E&T is a partner in the current Unified State Plan which is a system-wide plan and aligned with the State Workforce Development Board's strategic plan.

In FY2020, SNAP E&T will meet with employers across the state to introduce the program and to discuss a pipeline of potential employees. While the meeting is not consultative in its intent, the feedback received from employers is always beneficial for designing programming that meets the needs of the business community. As a recommended partner to WIOA, SNAP E&T has worked to align programming and services to those of partner agencies, organizations, and employers.

In an effort to better align and coordinate programs that help individuals prepare for competitive employment, SNAP E&T Coordinators are co-located in each of the comprehensive SC Works Centers across the state. This strategic co-location has proven to be beneficial in co-enrolling SNAP E&T participants in WIOA or other partner programming. As a participant in the aforementioned work group, SNAP E&T's involvement in the annual local MOU/IFA negotiations has resulted in better coordination of services at the local level. Local E&T staff are involved in business services discussions, job fair planning, and general service delivery.



FY 2020 South Carolina SNAP E&T State Plan Addendum - Agriculture Improvement Act of 2018 Implementation

Case Management Services

Describe how the State agency will provide case management services in the State's E&T program. This description should include:

- the entity (or entities) who will be responsible for carrying out case management services;
- the types of case management the State agency will provide, such as comprehensive intake assessments, individualized service plans, progress monitoring, and coordination with service providers; and
- how case management service providers will coordinate among E&T Providers, the State agency, and other community resources.

If the State agency is not able to provide case management services in FY 2020, the State agency must describe in their FY 2020 E&T State plan the actions they have taken and are planning to take to come into compliance, as well as a timeline for completion.

SCDSS' SNAP Employment & Training program provides intensive case management for every participant. Case management activities begin as early as the initial program orientation and continue throughout the client's participation.

Employment & Training Coordinators and TPRP agencies are responsible for completing an intake assessment and an individual employment plan for every client entering the E&T program. Participants are engaged in the assessment process, goal identification and the development of their employment plans.

SCDSS' intensive case management process includes but is not limited to the following:

- Gathering and analyzing information about the participant;
- Identifying a participant's strengths and weaknesses:
- Identifying and assisting with the removal of barriers;
- Developing and updating the employment plan jointly with the participant;
- Documenting SNAP E&T services provided, face-to-face meetings, and participation hours; and
- Identifying appropriate employment and/or training opportunities that may be available for participants.

All case management assessments, employment plans, support services, referrals and notes are entered into the South Carolina Comprehensive Employment & Training System database. Therefore, all documentation is accessible to E&T state agency staff for coordination of services.

STATE OF SOUTH CAROLINA



TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) STATE PLAN RENEWAL

October 1, 2018 - September 30, 2021

SOUTH CAROLINA DEPARTMENT OF SOCIAL SERVICES

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South Carolina Temporary Assistance for Needy Families (TANF) State Plan Renewal

1.0 GOALS AND OBJECTIVES OF THE TANF PROGRAM

1.1 The Temporary Assistance for Needy Families (TANF) Program

The four purposes of the TANF Program are to:

- (1) Provide assistance to "needy" families so children may be cared for in their own homes or in the homes of relatives:
- (2) End the dependence of "needy" parents on government benefits by promoting job preparation, work, and marriage;
- (3) Prevent and reduce the incidence of out-of-wedlock pregnancies; and
- (4) Encourage the formation and maintenance of two-parent families.

1.2 Definitions of Assistance

The following TANF benefits are defined as assistance:

- (1) TANF monthly check or stipend;
- (2) Family Cap Voucher;
- (3) Support Services for unemployed families; and
- (4) Work Experience Training Allowance.

The following TANF benefits are not defined as assistance:

- (1) Nonrecurring short-term benefits designed to deal with a specific crisis situation or episode of need, not intended to meet ongoing needs and that will not extend beyond four months;
- (2) Support services to employed families;
- (3) Refundable earned income tax credits; and
- (4) Transportation provided under a Job Access/Reverse Commute Project provided to an individual who is not otherwise receiving assistance.

1.3 State Welfare Policy

The State conducts a TANF program, known as Temporary Assistance for Needy Families (TANF) in South Carolina (formerly known as Family Independence in South Carolina) that provides assistance to needy families with dependent children and provides parents or caretaker relatives with job preparation, work, and support services to enable them to

leave the program and become self-reliant. It is the policy of the State of South Carolina that personal responsibility and parental responsibility must exist if citizens are to attain independence. The welfare system is based upon a reciprocal agreement between TANF recipients and taxpayers because it is to the benefit of the citizens of the State to transition recipients from welfare to work. The State will temporarily support needy parents if they will undertake appropriate steps to attain employment and self-reliance. TANF assists families to become economically independent, provides tools to achieve and maintain self-reliance, and deters abuse of the system through fair and meaningful sanctions.

1.4 Program Objectives

- (1) To support family life by paying a monthly benefit, providing support services, education, job training and job placement and promoting continued employment with increasing income until the family's total financial resources rise above the eligibility level for public benefits.
- (2) To achieve long term improvement in family functioning through collaboration and mutual planning with families.
- (3) To ensure a well-coordinated service delivery system to assess multiple barriers to employment and provide treatment, training, education and job placement services.
- (4) To advance economic independence and support stable families by providing preventive services such as after school activities, home visitation programs, and counseling and treatment services.
- (5) To prevent and reduce the incidence of out-of-wedlock pregnancies by providing teen pregnancy prevention programs and family planning activities.
- (6) To encourage the formation and maintenance of two parent families through educational initiatives and marriage friendly agency policies.
- (7) To support children and two parent families by offering child support services and encouraging father involvement.
- (8) To support and stabilize families of children with caretaker relatives by providing counseling, child care and support services to the caretaker relatives in child only cases.
- (9) To encourage individual responsibility by providing the tools to achieve and maintain self-reliance and deter abuse of the TANF system through the imposition of fair and meaningful sanctions.
- (10) To promote self-esteem, self-dignity, and self-worth of the TANF recipients through maximizing employment opportunities within the State and through

- the development of entrepreneurial and job opportunities in conjunction with the private business community.
- (11) To provide employment retention and advancement activities to employed clients to enhance job skills and promote career advancement.
- (12) To provide emergency assistance to or on behalf of needy children under age 18 and other family members where the children are the subject of abuse or neglect or have been in substitute care and can be reunited with their families.
- (13) To ensure that families that are not eligible for TANF payments or who are no longer receiving assistance are aware of, and have access to, all benefits available to them.
- (14) To evaluate the status of current and former TANF recipients by collecting data to assess program quality and outcomes for children and their families.

1.5 Public Involvement

In order to inform both public agencies and private sector organizations, a Notice of Public Interest was published on the South Carolina Department of Social Services (DSS) website (https://dss.sc.gov) stating the availability of the South Carolina Temporary Assistance for Needy Families (TANF) State Plan. Interested parties were notified the draft TANF State Plan, which provides for cash assistance and support services for the TANF Program (formerly AFDC), is being made available for public review and comment. The public comment period complies with the provisions of Public Law 104-193, Section 402(a)(4)(B), dated August 22, 1996. Interested parties were notified that copies of the plan would be made available to them by contacting the Department of Social Services, Economic Services Division of Policy and County Operations, P.O. Box 1520, Columbia, SC 29202-1520, (803) 898-9473 and that comments must be made within 45 days, in writing, to Ms. Dana Outlaw, Division Director, at the above address.

In addition, the text of this document was made available on the same website at https://dss.sc.gov.

1.6 TANF Benefit Restrictions

The Middle Class Tax Relief and Job Creation Act of 2012 (P. L. 112-96) requires South Carolina to maintain policies to prevent TANF families from accessing or using their benefits in any liquor store; casino, gambling casino, or gaming establishment; or any retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

1.6.1 TANF Benefits

South Carolina provides TANF benefits through three methods:

- (1) Paper checks for recipients who have demonstrated electronic card misuse or recipients without the appropriate demographic information to establish a bank account;
- (2) Deposit into a debit account with a branded MasterCard (ePay); and
- (3) Direct deposit into a personal account by state procedure, limited to non-parents with custody of the TANF eligible child(ren).

South Carolina does not use Electronic Benefits Transfer (EBT) for cash programs.

TANF recipient payments delivered electronically to debit accounts, called ePay, are set up by a contracted vendor. The only funds deposited in the account are those issued by DSS and can be accessed only by the debit card. ePay accounts are governed by FDIC regulations. In South Carolina, any TANF recipient, without the appropriate demographic information, will receive benefits in the form of a paper check.

Instructional material and information regarding the ePay cards, TANF restrictions, benefit access, customer service, fees, etc., are issued, upon approval, to recipients in a cardholder "Welcome Packet" by our contractor.

1.6.2 Benefit Access and Fee Information

- A. South Carolina recipients receive information on how to access benefits without paying fees as well as applicable fees and surcharge information. The recipient is free to choose the most advantageous and safest method to access his/her benefits. Access to benefits is not limited to locations at which cash is provided. Recipients may access benefits at automated teller machines (ATM) or use Point-of-Sale (POS) devices to make purchases at locations that accept MasterCard. Recipients have free access when the ePay card is used in transactions at U. S. merchants and retailers or when they receive cash back with a purchase. POS transactions allow "cash-back" options at no additional charge.
- B. Recipients are allowed free, teller-assisted "over the counter" cash transactions at any bank or credit union that accepts MasterCard for the dollar amount of the recipient's choosing. Recipients are allowed two ATM cash withdrawals for no fee per month at MoneyPass® ATMs. A \$1.50 fee will be assessed for each additional ATM withdrawal. Out-of-Network ATM withdrawals will also assess \$1.50 fee for withdrawals not conducted at MoneyPass® ATMs. ATM owners and operators may charge an additional fee called "surcharge" or "convenience fee" to use their ATM. DSS state office staff review the fees charged monthly in order to monitor and evaluate the

utilization of the funds. The ePay card can be used for electronic bill paying via the internet.

Information regarding applicable fees and surcharges are included in the recipient's "Welcome Packet" and are also included on an "ePay Flyer" in the Resource Library of the DSS Website that is available to the public. https://dss.sc.gov/resource-library/forms-brochures/files/1202.pdf

1.6.3 State Compliance

- A. South Carolina State Regulation 114-1150 Determination of Benefits provides the TANF benefit restrictions. 114-1150(F) states that TANF payments are not to be accessed, by electronic transaction using a Point-of Sale device, ATM, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service, at any of the following locations:
 - A liquor store. A liquor store means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store which sells both intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008(7U.S.C. 2012(r)).
 - ii. A casino, gambling casino or gaming establishment.
 - iii. An adult oriented entertainment establishment which is defined as a retail establishment that provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment are prohibited.
- B. Merchant Category Code blocks were placed on the SC ePay cards to prevent the use of the ePay cards at the retailer types listed below:
 - i. Package Stores/Beer/Wine/Liquor
 - ii. Betting/Track/Casino/Lotto
- C. DSS provides information to new ePay TANF clients which give details on how to access TANF benefits and restrictions described in 1.6.
- D. DSS includes TANF restrictions in written notices sent at initial approval and at annual redetermination.
- E. Posters with restrictions have been distributed to all 46 county offices and provided to partners contracted by DSS to serve our TANF population.
- F. DSS has placed the restriction information on the DSS webpage, at www.dss.sc.gov.

South Carolina does not allow the operation of casinos within its borders, nor does the one federally recognized Indian tribe in South Carolina operate a casino on tribal land. Adult entertainment businesses are not regulated by state licensing or local regulations, nor are

there unique Merchant Classification Codes for adult entertainment businesses. Local governments default to local ordinances for nuisance businesses (e.g., tattoo shops, chicken or pig operations, etc.), if there are issues relating to a local business. The MCC used by some of these businesses is the same as can be used by theaters or museums (i.e., entertainment or education). DSS continues to seek avenues to address this unregulated group.

1.6.4 Penalties

South Carolina State Regulation 114-1140 Q(1)(c)(iv) has been revised to state that DSS will recover an overpayment from any assistance unit of which an adult member accessed all or part of their monthly payment at a liquor store, casino, gambling casino or gaming establishment or an adult-oriented entertainment establishment. If TANF benefits are used at such locations, the transaction amount is considered an overpayment and a claim must be established against the household and the claim investigated by DSS Benefit Integrity staff. Overpayment means a financial assistance payment received by or for an assistance unit for the payment month exceeds the amount for which the unit was eligible. The Benefit Integrity staff work in concert with the DSS Law Enforcement agents to obtain required bank transaction records to establish the claim. DSS has uniform statewide procedures for recovery of overpayments of assistance.

2.0 ADMINISTRATION

2.1 Structure

DSS is a cabinet level department under the Governor's Office. The State Director, who is appointed by the Governor with the consent of the Senate, has direct line supervision over the 46 County Directors who administer the program.

2.2 Role of Public and Private Contractors

TANF is an interagency partnership between DSS and many other State government agencies. This partnership facilitates the ongoing coordination and collaboration that are essential to the planning and provision of services designed to meet the human service, employment and training, and educational needs of the TANF clients. DSS is also a partner with other public and private organizations that share in the TANF mission. These partners include service providers, community action agencies, the business community, local advisory committees and the faith community. Contracts are in place and others will be established with public and private entities to provide pregnancy prevention services, after school activities, home visitation services, and other prevention activities that promote safe and stable families.

Currently, coordinated memorandums of understanding ensure that TANF staff understands the type of services offered so that appropriate referral will be made on behalf

of the client. These agreements include, but are not limited to, those with the Department of Alcohol and Other Drug Abuse Services, Department of Health and Environmental Control, Department of Commerce, Department of Employment and Workforce, Commission on Higher Education, Department of Education (inclusive of local school districts), Department of Mental Health, Department of Vocational Rehabilitation, and the State Board for Technical and Comprehensive Education.

2.3 Indian Tribes

Indians living in the State who are tribal members will be treated as residents of the State and are subject to the same eligibility criteria as any other resident.

2.4 Statewideness

The State will conduct the TANF Program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner) to provide assistance and/or services to needy families with children, in all 46 counties of South Carolina. Activities of these offices related to the TANF program include accepting and processing applications for assistance, conducting reviews and redeterminations of eligibility and managing a program of work activities and requirements.

2.4.1 Program Requirements

Program operating guidelines which include all policies, procedures, etc., for the determination of initial and continued eligibility will be issued to the county offices by DSS State Office as needed. Such operating guidelines contained in department program manuals or other correspondence is binding on the county offices. Financial thresholds are provided in Attachment A.

Eligibility rules of the DSS will be uniformly applied in all cases in a county. The determination of need and amount of assistance for all applicants and recipients will be made on an objective and equitable basis and all types of income and potential income will be taken into consideration in the same way except where otherwise specifically authorized by State or Federal law or as stated in program operating guidelines issued by DSS.

To be eligible for TANF cash assistance a family must meet the following conditions:

- (1) Be U.S. citizens or meet certain alien requirements outlined in the TANF Manual, Chapter 4.
- (2) Be residents of South Carolina.
- (3) Be in need according to agency financial standards, see Attachment A.
- (4) The adult/teen parent must be related, within a specified degree, to a dependent child(ren) under the age of 18 living in the household.

- (5) The value of countable resources owned by the family must not exceed the limit of \$2,500,00.
- (6) Cooperate in self-sufficiency requirements including work and child support enforcement activities unless deferred from work requirements or unless good cause exists not to cooperate with child support, if applicable.
- (7) Provide or apply for a SSN for each member of the assistance unit.
- (8) Must not be participating in a strike.
- (9) Complete applicant initial job search, if applicable.

2.5 Services to Families who Move into South Carolina

Families who move into the State from another state will have their eligibility determined under the program requirements of the South Carolina TANF Program. South Carolina will not apply standards from the applicants' previous state of residence.

Note: Months of TANF benefits received in another state will be identified and counted against the federal five-year limit.

3.0 PROGRAM DESCRIPTION

The TANF Program is built around two primary components, set forth below:

(1) Work Program & Self-Reliance

The program provides temporary financial assistance and work training and education programs that lead to individuals' social and economic independence.

(2) Prevention Programs

Prevention programs focus on (a) teen pregnancy prevention, (b) strengthening and maintaining intact families, (c) assisting in the reunification of troubled families, and (d) providing short-term services and resources to resolve crisis situations that might result in welfare dependency.

3.1 Work Program and Self-Reliance

South Carolina will refer work eligible individuals receiving assistance to a TANF work program case manager for development of the TANF Family Plan. The Family Plan outlines the overall strengths and growth areas within the family and actions necessary to achieve self-reliance. The assessment process involves gathering and analyzing information on external and internal factors that affect the client to determine the current level of employability and work readiness. Assessments include screenings to identify potential barriers that may affect the client's ability to participate in work or work-related activities. Screening results may be used to refer to local service providers or qualified

specialists who will provide assistance to minimize barriers such as substance abuse, physical or learning disabilities, domestic violence and other impediments to employment.

DSS will require each work-eligible individual to sign an individual employment plan. The individual employment plan is an agreement between the recipient and DSS that describes the actions necessary to fulfill the vocational goals and time frames for completing those actions. Each work-eligible individual will be placed in work-related activities consistent with his/her skills, education, experience and competence. Work activities may include: employment, on-the-job-training, job search, job readiness activities, work experience, community service programs, vocational educational activities, job skills training or educational activities. Those caretaker relative families identified as "Child-Only" will not be required to participate in the TANF work program as they are exempt from work requirements and will not require an individual employment plan. The individual employment plan is also inclusive of the entire family and set forth steps that family members can take to attain a higher level of individual functioning.

DSS currently does not have a plan to assist individuals in training for, seeking and maintaining employment in the eldercare workforce as outlined in the Patient Protection and Affordable Care Act of 2010.

3.1.1 Job Search Requirement as a Condition of Eligibility

DSS will require TANF applicants, identified as work-eligible, to conduct an initial job search. Applicants who meet the criteria outlined in Section 2.4 #1 of the TANF Manual are exempt from the initial job search requirement.

Applicants considered young custodial parents (YCP) are required to conduct an initial job search as a condition of TANF eligibility. County staff will provide job search information during the initial interview with the YCP applicant. Young custodial parents:

- Are between the ages of 18-25;
- Do not have a high school diploma, GED or certificate of completion; and
- Have a child under the age of 12 months.

The YCP must make and document a minimum of five employer contacts during the application process. It is recommended that the search be completed within two weeks. Failure to complete the job search without good cause (good cause reasons are those generally considered to be beyond the control of the applicant) will result in denial of the application.

3.1.2 TANF Child Care and Support Services

DSS is committed to providing support services for clients based on individual needs. Child care and support services are available to assist an applicant of the TANF program

in order for them to conduct the initial job search, participate in approved job preparation activities, and obtain or maintain employment.

Also, clients participating in an approved educational or training activity, or who have become employed may receive support services. Support services include, but are not limited to, child care, transportation, prescription eyeglasses, physical exams, automobile repairs/car expenses, parenting programs, safety equipment, criminal records checks, and relocation assistance. Support services include coordination with other agencies for services such as alcohol and drug counseling, health services (non-medical treatment), housing services, vocational rehabilitation, mental health services and referral services, at no cost to the agency.

To allow parents to go to work, the State will provide reimbursement for child care pursuant to the state plan for the Child Care and Development Fund (CCDF), including the principle that parents will have the right to choose the child care arrangement that best meets the needs of their children. Under the CCDF plan, the State may provide funds for care by providers who meet the State's child care regulatory requirements or for qualifying self-arranged informal child care.

The State has established criteria, procedures, and definitions for determining whether a parent is unable to obtain needed child care so that a parent's failure to work or attend training on that basis may be addressed.

3.1.3 Work Training Allowance

A Work Training Allowance (WTA) is an allowance paid to a DSS Work Experience or Community Service Program participants if the number of monthly hours of work experience or community service participation multiplied by the federal minimum wage exceeds the combined dollar value of SNAP and TANF cash benefits. If the family is entitled to a WTA allowance, it must be provided as a supplemental TANF benefit.

3.1.4 Participation in Employment Preparation Programming

As part of the program's requirements, each adult and minor parent recipient determined by the case manager to be in need of employment skills training must participate in an employment preparation activity. These activities include, but are not limited to, job readiness training and supervised job search.

3.1.5 Employment Retention and Advancement

The TANF Program emphasizes pre-employment job keeping skills and offers postemployment services designed to ensure continuous attachment to the labor force. In order to foster employment stability, transitional services such as child care are provided. Other retention services may be offered including intensive case management, follow-up contacts and home visits, referrals to community resources, banking and financial management, and re-employment assistance. Special services and resources may be offered to employed clients to assist in their job progression and career advancement such as employment counseling, access to job leads and skill enhancement training.

3.1.6 Transitional Child Care

Transitional child care will be provided, based on available funding, for up to 24 months to individuals who meet the following eligibility criteria:

- TANF recipients who no longer receive a cash payment due to loss or declination of earned income disregards or increased earnings.
- (2) TANF recipients who formerly received a cash payment and who were employed at the time their case was closed.
- (3) TANF recipients who formerly received a cash payment and whose cash payments were terminated due to the 24-month time limit expiration; who become employed and (a) request assistance within 24 months from TANF case closure and (b) whose income did not exceed 85% of the State Median Income.
- (4) TANF recipients who formerly received a cash payment and an increase in child support income causes the TANF case to close when an adult household member is employed.
- (5) TANF recipients who formerly received a cash payment, had earned income, and requested the removal of earned income disregards, but this does not result in a case closure. The recipient can submit a request for voluntary case closure due to earned income.
- (6) A household member becomes employed or increases earnings during a full family sanction, and the earnings cause the household to become ineligible. In this situation, a TANF mini budget must be completed to determine if excluded earned income or refusal of disregards would cause the TANF case to close.

Eligibility will cease if any of the following occurs:

- (1) The recipient no longer has a dependent child in the home.
- (2) Employment ends (a 30-day interruption to go from one job to another job will be deemed continuous employment).
- (3) The client's income exceeds 85% of the State Median Income.

Assistance may be provided for up to 24 months from the first month of eligibility. Sanctioned clients may qualify for transitional child care by obtaining a full-time job and "curing" the sanction.

The state will expect the parent to make a co-payment based on a sliding fee scale. Parents will have the right to choose the child care arrangement that best meets the need of their child(ren). Payments will be made to providers who meet the State's child care regulatory requirements. Self-arranged, informal care arrangements that do not meet the State's child day care regulatory requirements will be paid for, if prescribed basic health and safety standards are met.

3.1.7 Work Program Sanction Exemptions

The recipient is exempt from the employment and training sanctions of the individual employment plan if the recipient is:

- (1) The only parent in the home with a child under one year of age; however, custodial parents under age 25 who have not completed their high school education are required to comply with these provisions regardless of the age of the child;
- (2) At least six months pregnant and the pregnancy is verified by a qualified licensed health care provider;
- (3) Incapacitated and the incapacity is verified by a physician as clearly precluding the recipient from engaging in current or future gainful employment, education or training;
- (4) Caring for an incapacitated child in the home or other adult relative whose incapacity has been verified by a physician and, if DSS considers it necessary, confirmed by an assessment performed by the Department of Vocational Rehabilitation; or
- (5) Unable to participate because appropriate child care or reasonable transportation was not provided.

3.1.8 Domestic Violence Option

DSS will provide waivers of certain program requirements (residency, child support, family cap, time limits and work requirements) pursuant to a determination of good cause of normal program requirements for so long as necessary in cases where compliance would make it more difficult for such individuals to escape domestic violence.

TANF applicants and recipients will be screened to identify individuals with a history of domestic violence. DSS has contracted with domestic violence service providers to provide comprehensive training on domestic violence to all TANF case managers.

Referrals to the local domestic violence agency for counseling and support services will be made upon identification of an individual with a history of domestic violence. Cases referred will be jointly staffed by DSS and the local domestic violence agency to develop a collaborative service plan designed to lead to self-reliance.

3.1.9 Sanctions for Failure to Comply with Employment and Training Requirements Contained in Employment Plans

Recipients not meeting the work program exemption criteria described in 3.1.7, who fail without good cause to comply with the employment and training requirements contained in the individual employment plan will be sanctioned in the following manner:

- (1) A 30-day conciliation period will be granted the recipient to discuss a failure to meet the terms of the individual employment plan. During the 30-day period the recipient may (a) establish good cause for failure to meet the terms of the individual employment plan, (b) agree to meet, in the future, the terms of the individual employment plan, or (c) terminate the conciliation process. If at the end of the conciliation process the participant does not comply, TANF benefits must be terminated by imposing a full-family sanction. The recipient has the right to appeal the Department's decision to impose a sanction. At the end of the appeal period, if the Fair Hearing decision is not in the recipient's favor, all TANF benefits must be terminated. Benefits may be reinstated when the recipient agrees to comply according to the terms of the agreement and demonstrates a willingness to comply by participating in the employment and training program or obtaining a full-time job for a period of 30 days.
- (2) Terminate all benefits if the recipient completes the training requirements contained in the individual employment plan and then refuses an offer of employment without good cause.

3.1.10 Requirement for Treatment of Alcohol and/or Drug Abuse

DSS may require the following recipients of benefits to participate in an alcohol or drug treatment program approved by the Department of Alcohol and Other Drug Abuse Services (DAODAS) as a part of their individual employment plan. If the recipient refuses, he/she is ineligible for benefits.

TANF recipients will be referred to DAODAS for clinical assessment for participation in an alcohol or drug treatment program who:

- Have been identified by a case manager, with concurrence from a supervisor, as possibly in need of alcohol or other drug abuse treatment services using screening indicators provided by DAODAS; or
- (2) Have within six months prior to the date of last application for TANF or have subsequently been convicted of an alcohol or drug related offense; or

(3) Within six months prior to the date of last application for TANF or subsequently gives birth to a child who tests positive for drugs.

Determination that substance abuse treatment is necessary will be made by appropriate clinical staff approved by DAODAS. Such staff will also assess the participant's compliance with the treatment program using recognized methods of assessment including, but not limited to, random testing. In no instance shall failure to pass a random test by itself constitute a noncompliance with treatment. For participants who complete the approved DAODAS treatment program, DSS will monitor their compliance with the individual employment plan using recognized methods of assessment including, but not limited to, random testing. Failure to pass such a random test for use of alcohol shall not constitute the basis for a sanction, but may constitute grounds for review by a clinical professional who will determine if there are additional indicators of substance abuse or grounds for resumption of treatment. DSS may sanction for noncompliance with the individual employment plan those participants who complete treatment and fail to pass a random test for use of illegal drugs.

DSS will keep records of an individual's alcohol and drug treatment participation confidential and will not release this information to law enforcement personnel.

TANF funds are not used for medical services per 408(a)(6) of the Social Security Act.

3.1.11 Resource Limit

The resource limit for all liquid resources and real property, excluding homestead property, is \$2,500 for applicant and recipient households.

3.1.12 Vehicles

One licensed/registered automobile per licensed driver in the household (passenger car or other motor vehicle) is excluded. If a household member owns a vehicle that is not licensed/registered, the equity value of this vehicle is counted against the \$2500 resource limit. A household member may own more than one vehicle as long as the number of vehicles does not exceed the number of licensed drivers. The following vehicles are also excluded:

- (1) Vehicles owned by or used to transport a disabled person;
- (2) Vehicles essential to self-employment;
- (3) Income producing vehicles; and
- (4) Vehicles used as a home.

3.1.13 Earned Income Disregards

Provided the household has passed the 185% gross income limit test, the State will disregard from earned income:

- (1) 50% of the monthly gross countable earned income of each individual whose needs are included in the budget for the first four months in which earned income is countable. This is a onetime only disregard.
- (2) \$100 per month from gross countable income of each individual whose needs are included in the budget, for the remaining months of eligibility after the four months in (1) above have been exhausted.

3.1.14 Earned Income of Minors

The earned income of any minor in the household of an adult specified relative is excluded in the eligibility and benefit determination.

3.1.15 Interest and Dividend Income

Interest and dividend income up to \$400 per year per household is disregarded in the eligibility and benefit determination.

3.1.16 Time Limits

Under State Law, a family may receive TANF benefits for no more than 24 months out of 120 months. The exceptions are:

- (1) An adult household member is permanently or totally disabled, whether physically or mentally and the disability is expected to last 90 days or longer. The disabled are exempted under state law and are being served in a solely funded State program.
- (2) An adult household member is providing full-time care for a disabled family member living in the home.
- (3) The teen parent/adult (both parents in a two-parent household) of the child(ren) for whom assistance is received is a minor under the age of 18 who has not completed high school. Assistance must be provided for a period of up to 24 months after the minor parent attains the age of 18 or completes high school, whichever occurs first.
- (4) Child care or transportation is not reasonably available for participation in work requirements.
- (5) The adult caretaker relative is not the parent of the child and is not included in the TANF cash benefits.

- (6) An adult household member is providing a home for and caring for a child whom DSS has determined to be abandoned by his or her parents and for whom the alternative placement is foster care.
- (7) An adult household member is involved in an approved training/education program set forth on his/her individual employment plan that will not be completed by the 24th month. An extension is granted for up to six months when the training/education program has a fixed beginning and ending date and has a specific job/vocational goal. If the program has not been completed by the 30th month and satisfactory progress toward completion is being made, the County Director may grant month-to-month extensions for as long as necessary to complete the program and secure employment.
- (8) Any household that contains two parents in the TANF grant, including sanctioned or disqualified parents. These clients are being served in a solely funded State program. Households that contain an SSI parent or an ineligible alien will not be considered a two-parent household.

Households not meeting any of the time limit exception criteria above are subject to the 24-month time limit from the point in which the household begins receiving benefits, regardless of the time in which they become job ready.

TANF allows for up to 20% of the TANF caseload to be extended beyond the federal 60-month time limit due to hardship reasons. If one or more of the following criteria are met, an extension beyond the 60 months should be given:

- (1) A family member is a victim of domestic violence and the family member is enrolled in a program supervised by a recognized domestic violence advocate.
- (2) The family has an open case with Child Protective Services.
- (3) As a result of the Family Plan, an adult household member is active in a recognized substance abuse treatment program.
- (4) The family has reached the federal time limit, but has not yet reached the State 24-month time limit due to months received in another state. This is an extension reason only. If an applicant is ineligible in another state due to federal time limits, he/she must meet a state time limit exemption to become eligible in South Carolina.
- (5) An adult in the household is working a full-time job but is still eligible for a TANF benefit.

3.1.17 Family Cap

DSS will not increase benefits to an eligible family as a result of a child born to that parent 10 or more months after the family begins to receive TANF benefits. This requirement does not apply if the State determines that the child was conceived as a result of rape or incest.

DSS may provide benefits for a child born after 10 months in the form of vouchers that may be used to pay for goods and services as determined by DSS, that permit the child's custodial parent to participate in education, training and employment related activities.

3.1.18 Recipients under the Age of 18 Must Attend School

TANF recipients under the age of 18 must be enrolled in school and maintain satisfactory attendance, as defined by the South Carolina Department of Education, as a condition of eligibility for benefits, unless they have attained a high school diploma, GED or certificate of completion.

3.1.19 Requirement to Provide Certain Information for Child Support Purposes and Sanctions for Failure to Provide It

As a condition of eligibility applicants and recipients of TANF must provide:

- (1) The first and last name of the absent parent and putative father and any known license(s) which might be subject to revocation; and
- (2) At least two of the following items on each absent parent and each putative father named:
 - (a) Date of birth;
 - (b) Social Security Number;
 - (c) Last known home address;
 - (d) Last known employer's name and address;
 - (e) Either of the absent parents' name and address.

An applicant or recipient who fails to provide this information or who provides the names of two putative fathers, both of whom are excluded from paternity by genetic testing, is ineligible for assistance for herself and the child for whom parental information was not provided unless the applicant or recipient verifies there is good cause for not providing this information. Good cause includes, but is not limited to, documentation of incest, rape, or the existence of or the threat of physical abuse to the child or custodial parent.

When paternity is legally established for a child in sanctioned status, TANF benefits may be granted, if all other eligibility requirements are met.

3.1.20 Disregard of Cash Value of Life Insurance

The cash value of life insurance is disregarded for any person whose resources must be counted in determining TANF eligibility.

3.1.21 Confidentiality Requirements Regarding TANF Recipients

DSS restricts the use and disclosure of information about individuals and families receiving assistance in accordance with South Carolina State Regulations, Chapter 114, Article 11, Section 114.1170, Safeguarding Information. However, DSS may disclose confidential information to agencies and entities outside the Department, that provide services to recipients to enable them to become independent and self-reliant when DSS has the recipient's signed release form on file stating that he/she consents to the release of confidential information regarding his/her household.

3.1.22 Reporting Requirements

TANF recipients shall report the following changes within ten days:

- A change in the composition of the household;
- (2) A change of address;
- (3) Employment status which includes obtaining a job or losing a job, hours of employment or rate of pay; or
- (4) Source of income.

When it is determined that a household member temporarily living away from home will not return, the recipient must report this within five days.

Failure to report any of the above changes does not excuse the recipient from repayment of benefits in the situation where failure to report caused an overpayment of the TANF benefit.

3.1.23 Citizenship and Alien Status

Applicants and recipients of TANF benefits must be citizens of the United States or qualified aliens within the scope of TANF eligibility as described in Section 4.4, #3, TANF Policy Manual.

3.1.24 Annual Review

There will be at least one redetermination of eligibility factors every 12 months. An interview is required.

3.1.25 Needy Families

TANF households containing one or two parents or a non-parent caretaker relative may receive benefits, if financially and otherwise eligible. Income criteria is in Attachment A of this plan and the resource criteria is in Sections 3.1.10 and 3.1.11 of this State Plan.

3.1.26 Non-Citizens

In addition to U.S. citizens, certain non-citizens who otherwise qualify may also be eligible for benefits.

The following groups of non-citizens may receive benefits if all other requirements are met, for up to five years from either the date the status is granted or from the date of entry:

- (1) Refugees, Asylees, Amerasians, Cuban/Haitian entrants and aliens whose deportation is withheld.
- (2) Victims of severe forms of trafficking (those forced into prostitution, slavery, or forced labor) through coercion, threats of violence, psychological abuse, torture, and imprisonment.
- (3) Aliens granted parole for at least one year under Section 212 (d)(5) of the INA, aliens battered or subjected to extreme cruelty in the U.S., and aliens granted conditional entrant refugee status before April 1, 1980.
- (4) Lawful permanent residents who have worked or can be credited with working in the United States for 40 qualifying quarters under Title II of the Social Security Act.

3.1.27 Fair Hearings

Applicants and recipients of the TANF Program are granted appeal rights from decisions they deem to be adverse. When a hearing is requested within ten days after the receipt of an adverse notice, the TANF benefits are not continued unless the recipient specifically requests in writing that they be paid pending the hearing decision. The recipient must be informed that an adverse hearing decision will require the repayment of benefits paid pending the hearing decision. Fair hearings for TANF applicants and recipients are provided for in South Carolina State Regulations, R. 114-110. The specific procedures for a Fair Hearing are found in the South Carolina Department of Social Services TANF Policy Manual, Chapter 22 - Fair Hearings.

3.1.28 Legal Basis of the TANF Program

The State operates the TANF Program under the following provisions:

- (1) Title IV-A of the Social Security Act, as amended.
- (2) Title 45, Code of Federal Regulations, Parts 260-265.

- (3) South Carolina Code of Laws of 1976, Title 43, Social Services, Chapter 5, Public Aid, Assistance and Relief Generally, Articles 1, 5 and 9.
- (4) South Carolina State Regulations, Chapter 114, Article 11, Family Independence Program.
- (5) The South Carolina Department of Social Services TANF Policy Manual.

3.2 Prevention Programs

The State considers prevention programs to be critical in assisting families to provide safe, stable nurturing environments for their children. The following prevention programs will accomplish these goals.

3.2.1 Adolescent Pregnancy Prevention

DSS contracts with entities to provide Abstinence until Marriage teen pregnancy prevention programs and services within the State. The programs provide an abstinence first, age appropriate comprehensive approach to health and sexuality education with a goal of preventing adolescent pregnancy throughout South Carolina.

3.2.2 Statutory Rape Prevention Program

DSS believes that as part of the educational efforts it will provide in programs designed to promote responsible fatherhood, encourage marriage, and build character and higher self-esteem, statutory rape prevention issues will be discussed and training will be provided. TANF workers are required to report cases of suspected abuse or neglect to the Child Welfare Division/Human Services.

DSS partners with the SC Center for Fathers and Families, a faith-based organization, whose mission is to develop and support a statewide infrastructure deeply invested in repairing and nurturing relationships between fathers and families. The Center for Fathers and Families works with six local fatherhood programs in 11 locations to deliver quality, father-friendly services throughout South Carolina. The program addresses ways to overcome obstacles to becoming an engaged and responsible father by focusing on a wide range of topics such as improving employment status, family relationships, effective communication, job readiness, child support and the legal system, financial management, parenting and co-parenting, healthy relationships, men's health and education.

DSS partners with the SC Campaign to Prevent Teen Pregnancy which provides programs/trainings engages adult males and also addresses the problem of statutory rape. Programs provided by the SC Campaign to Prevent Teen Pregnancy include information regarding legal definitions and consequences of statutory rape and the SC law regarding the age of consent. Training is designed to reach state and local law enforcement officials,

community educators which include teachers, coaches, nurses and other health professionals such as those providing counseling services.

DSS through its Domestic Violence and Batterers Intervention Programs provides assistance for victims, their dependents, and perpetrators of Intimate Partner Violence. The goals of the Domestic Violence Programs are to prevent and/or reduce the incidence of domestic violence and ensure accessible emergency shelter and related assistance to those in need of services for the intervention and prevention of Intimate Partner Violence as well as for treatment for perpetrators. Domestic Violence Programs work with multiple government and non-government agencies to address the serious problem of domestic violence in our state and to reduce domestic violence in South Carolina. DSS partners with other state agencies such as South Carolina Coalition Against Domestic Violence and Sexual Assault (SCCADVASA), Department of Public Safety and the Department of Health and Environmental Control in an effort to develop and sustain the best methods in domestic violence prevention.

3.2.3 Emergency Assistance – Title IV-A

As permitted in Section 402(a)(2) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, South Carolina will continue to operate an Emergency Assistance Program as it was in effect in September 30, 1995.

Emergency Assistance is available to or on behalf of a needy child under the age of 18 and any other member of the family in which he/she is living; a needy child is defined as one without resources immediately available to meet his/her needs. Migrant workers are covered on a statewide basis.

A. Kinds of Emergencies Covered:

- (1) Children who are the subject of a child abuse and/or neglect report and are at risk of removal from the home because of abuse, or neglect, or inability of parents to provide care.
- (2) Children who have been in Substitute Care less than six months and, with assistance can be reunited with their families.

B. Kinds of Assistance Provided to Meet Emergency Situations:

- (1) Shelter cost, including rent/mortgage, utilities, fuel, and home repairs.
- (2) Emergency medical care and transportation, if not provided under other programs.
- (3) Emergency care, emergency foster care, or emergency residential group care for children separated from their families, including food, clothing, and supervision, if necessary, to effect reunification.

C. Kinds of Service Provided to Meet the Emergency Situations:

- (1) Information and referral, case management, counseling and in-home family services.
- (2) Parenting education and training and incidental homemaker support services.
- (3) Child and respite care.

3.2.4 Delivery of Services to Needy Families

Services will be provided to needy families whose income is equal to or less than 200% of the Federal Poverty Guidelines issued by the U.S. Department of Health and Human Services. There is no resource test in order to receive these services. Services provided in the following paragraph will meet goal one as stated in section 1.1 of this State Plan.

Services such as the following will be available; however, some of them may only be available in selected counties:

- (1) Intensive case management and treatment services for low income parents (and their children) that are in need of addiction services for alcohol or other drug abuse.
- (2) Preschool programs will be offered with services that assist parents in promoting optimal early childhood development, school readiness, and in reducing the risk of children developing major physical, developmental and learning problems. These programs will help ensure that children arrive at school ready to learn and will increase the likelihood of eventual self-reliance.
- (3) After school and summer programs will be offered to students with services that provide students with basic and remedial educational services, recreational activities, life skills classes, enhancement of self-esteem, health education and parental involvement activities.
- (4) A unified literacy program, incorporating components from early childhood education, adult literacy or adult basic education, and parenting education programs, will be made available to low income clients.

Other services to be provided include psychological evaluations, family and group counseling, case management including home visitation, and community based assessment to determine the type of crisis intervention necessary to maintain the family or to expedite family reunification.

3.2.5 Prior Title IV-A and IV-F State Plans Reference Date

South Carolina has adopted the date of September 30, 1995, as the reference date for any programs currently operated that were contained in our prior-approved Title IV-A or IV-F State Plans.

3.2.6 TANF Outreach and Employment Services

In order to increase economic stability and greater levels of economic self-sufficiency, DSS provides TANF outreach services that provide information about TANF and related services or programs for which low income families might be eligible, including Medicaid, SCHIP, school lunch and other benefits. Outreach services include an informational brochure, provided to all recipients of the Supplemental Nutrition Assistance Program (SNAP) with income less than 200% of the federal poverty level.

Any SNAP custodial or non-custodial parent or responsible relative of a child may also receive employment services that include, but are not limited to the following: orientation, assessment, case management, employment plan development, barrier resolution, job search skill training, resume and soft skill development, job placement services, support services, retention and re-employment services. These services meet TANF purposes 1 and 2, and do not provide basic income support or constitute "assistance" under the Federal rules.

4.0 STATE MAINTENANCE OF EFFORT (MOE) EXPENDITURES

As a condition of receiving federal TANF funds, states are required to spend a certain amount of their own funds ("Maintenance of Effort") on TANF-allowable categories. South Carolina's State MOE funds are expended in the following categories:

- (1) Basic Assistance: cash payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).
- (2) Education and Training Activities: secondary education; adult education, GED or equivalent and ESL classes; education directly related to employment; job skills training; education provided as vocational educational training or career and technical education; and post-secondary education.
- (3) Early Care and Education:
 - a. Child Care (spent or transferred): child care expenditures for families that need child care to work, participate in work activities or for respite purposes. Also includes funds transferred to Child Care and Development Fund (CCDF) Discretionary.

- Pre-Kindergarten/Head Start: pre-kindergarten or kindergarten education programs, expansion of Head Start programs, or other school readiness programs.
- (4) Program Management: administrative costs and systems costs related to monitoring and tracking under the program.

5.0 PROGRAM TO INCREASE SCHOOL SUCCESS

Effective October 1, 2004, the State established a segregated state program for the purpose of increasing school success. State expenditures for this program shall be countable as State Maintenance of Effort. The goal of this state-funded pre-school program is to increase the number of children who enter first grade ready to learn and thereby increase the likelihood of school success for children in needy families.

Pre-school age children from families with incomes at or below 185% of the Federal Poverty Level are eligible for this program.

School-readiness and early school success have been shown to increase attachment to school. Attachment to school decreases the chances that teens will have out of wedlock pregnancies and increases the likelihood that children will remain in school through graduation from high school. These outcomes meet the following TANF goals:

- End the dependence of needy parents on government benefits by promoting job preparation and work.
- Prevent and reduce the incidence of out-of-wedlock pregnancies.

6.0 PROGRAM TO INCREASE EARNINGS CAPACITY

Effective April 1, 2005, the State established a segregated state program for increasing the earning capacity of low income individuals in the State. State expenditures for this program, as well as other certified public expenditures, shall be countable as State Maintenance of Effort.

The goal of this state-funded scholarship program is to increase the number of students from low-income families that can attend college. High-school graduates from families with incomes at or below 200% of poverty are eligible for this program.

College graduates are more likely to achieve success in employment, increase their earnings and break the cycle of poverty. These outcomes meet the following TANF goal:

 End the dependence of needy parents on government benefits by promoting job preparation and work.

7.0 IMPLEMENTATION DATE

The implementation date of this Temporary Assistance for Needy Families Block Grant renewal plan is October 1. It may be updated periodically with amendments during the next three-year period.

CERTIFICATIONS

South Carolina will operate a program to provide Temporary Assistance for Needy Families (TANF) so that the children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage; to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

This program is known as: The SC TANF Program

Executive Officer of the State: Henry McMaster, Governor

Acting State Director, Department of Social Services: Joan Meachum

In administering and operating a program that provides Temporary Assistance for Needy Families with minor children under Title IV-A of the Social Security Act, the State will:

(1) Specify which State agency or agencies will administer and supervise the program under Part A in all political subdivisions of the State:

The South Carolina Department of Social Services is the agency responsible for administering the program;

- (2) Assure that local governments and private sector organizations:
 - (a) Have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
 - (b) Have had at least 45 days to submit comments on the plan and the design of such services.
- (3) Operate a Child Support Enforcement Program under the State Plan approved under part D;
- (4) Operate a Foster Care and Adoption Assistance Program in accordance with part E, and certify that the State will take all necessary actions to ensure that children receiving assistance are eligible for medical assistance;
- (5) Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government;

- (6) Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage; and
- (7) Make available to the public a summary of the plan.

On November 21, 1996, the Governor of South Carolina notified the Secretary of the U.S. Department of Health and Human Services, consistent with section 407(e)(2), Part A, Title IV of the Social Security Act, that the State was opting out of the provision of requiring a parent or caretaker relative receiving assistance, who after receiving assistance for two months is not exempt from work requirements and is not engaged in work, to participate in community service employment for a minimum number of hours per week.

Optional Certification:

☐ The State does not elect this option

- (1) Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- (2) Refer such individuals to counseling and supportive services; and
- (3) Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

CERTIFIED BY THE CHIEF EXECUTIVE OFFICER OF SOUTH CAROLINA:

14-2019 Date

Henry McMaster Governor

FUNDING

Section 403(a)(1)(A) provides that each eligible State shall be entitled to receive for each of the fiscal years beginning in 1996, a grant in an amount equal to the State family assistance grant as defined in section 403(a)(1)(B).

I. Payments to Agency Administering the TANF Program

Payments for the TANF program will be made to the organization managing the AFDC/JOBS programs as of August 22, 1996, unless the State indicates that the TANF administering agency is changed. If a change is made, describe the name, address and EIN number of the new organization. Funding will continue at its current level as is consistent with the continuing resolution of the TANF Program as passed by Congress.

II. State Payments for TANF Program

Section 405 requires that grants be paid to States in quarterly installments, based on State estimates. The State's estimate for each quarter of the fiscal year by <u>percentage</u> is:

For FY 2011 and Future Years

First	Second	Third	Fourth
<u>Quarter</u>	<u>Quarter</u>	<u>Quarter</u>	Quarter
25	25	25	25

Attachment A

TANF NEED STANDARD TABLE EFFECTIVE OCTOBER 2018

Number in Benefit Group	Annual Federal Poverty Guidelines 2018	200% Monthly Federal Poverty Guidelines	Monthly Federal Poverty Guidelines	Gross Income Limit (185% of Need)	Need Standard (50% of poverty)	Payment Standard (33.72% of Need with no income)
1	\$12,140	\$2024	\$1012	\$936	\$506	\$170
2	\$16,460	\$2744	\$1372	\$1269	\$686	\$231
3	\$20,780	\$3464	\$1732	\$1602	\$866	\$292
4	\$25,100	\$4184	\$2092	\$1935	\$1046	\$352
5	\$29,420	\$4904	\$2452	\$2268	\$1226	\$413
6	\$33,740	\$5624	\$2812	\$2601	\$1406	\$474
7	\$38,060	\$6344	\$3172	\$2934	\$1586	\$534
8	\$42,380	\$7064	\$3532	\$3267	\$1766	\$595

NOTE: For family sizes over 8, \$180 is added to the need standard for each additional person. To determine the Gross Income Limit, multiply the Need Standard by 1.85 and drop the cents. To determine Payment Standard/Award, multiply the Need Standard by .3372 and drop the cents.

	Title I - Adult Program			
	Program \	/ear: 2020	Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	77.3		77.8	
Employment (Fourth Quarter After Exit)	73.5		74.0	
Median Earnings (Second Quarter After Exit)	\$5,153		\$5,179	
Credential Attainment Rate	60.0		60.5	
Measurable Skill Gains	38.5		39.0	

	Title I - Dislocated Worker Program				
	Program \	Year: 2020	Program Year: 2021		
	Expected Level	Negotiated Level	Expected Level	Negotiated Level	
Employment (Second Quarter After Exit)	80.6		81.1		
Employment (Fourth Quarter After Exit)	76.5		77.0		
Median Earnings (Second Quarter After Exit)	\$6,725		\$6,759		
Credential Attainment Rate	60.0		60.5		
Measurable Skill Gains	31.8		32.3		

	Title I - Youth					
	Program \	rear: 2020	Program Year: 2021			
	Expected Level	Negotiated Level	Expected Level	Negotiated Level		
Employment (Second Quarter After Exit)	77.1		77.6			

Employment (Fourth Quarter After Exit)	69.5	70.0	
Median Earnings (Second Quarter After Exit)	\$3,000	\$3,015	
Credential Attainment Rate	68.6	69.1	
Measurable Skill Gains	45.3	45.8	

	Title II - Adult Education and Family Literacy Act Program				
	Program \	/ear: 2020	Program Year: 2021		
	Expected Level	Negotiated Level	Expected Level	Negotiated Level	
Employment (Second Quarter After Exit)	30		31.0		
Employment (Fourth Quarter After Exit)	30		31.0		
Median Earnings (Second Quarter After Exit)	\$3,000		\$3,100		
Credential Attainment Rate	25		26		
Measurable Skill Gains	44		45		

	Title III - Wagner-Peyser Act Employment Service Program				
	Program \	rear: 2020	Program \	/ear: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level	
Employment (Second Quarter After Exit)	68.0		68.5		
Employment (Fourth Quarter After Exit)	67.5		68.0		
Median Earnings (Second Quarter After Exit)	\$4,515		\$4,538		
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable	
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable	

	Title IV - Vocational Rehabilitation Program				
	Program \	/ear: 2020	Program Year: 2021		
	Expected Level	Negotiated Level	Expected Level	Negotiated Level	
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline	
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline	
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline	
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline	
Measurable Skill Gains	*		*		

	All WIOA Core Programs					
	Program \	/ear: 2021				
	Expected Level	Negotiated Level	Expected Level Negotiated L			
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable		

Additional Indicator of Performance

- 1. Participant Cost Rate Policy (LWDAs expected to meet a minimum participant cost rate of 30%)
- 2. Obligation Rate Policy (LWDAs to obligate 80% of the program portion of current allocation)
- 3. Fund Utilization Policy (LWDAs required to have a minimum 70% fund utilization rate)