



**DRAFT**

**Workforce Innovation and Opportunity Act (WIOA)**

# **Unified State Plan**

for

**Program Year 2024 - 2027**



**Adult Education State Office  
(ABE)**



**COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**  
**OFFICE OF VOCATIONAL REHABILITATION**  
*TOGETHER WE CAN BUILD A FUTURE*

## TABLE OF CONTENTS

<b>I.</b>	<b>WIOA State Plan Type and Executive Summary</b>	<b>1</b>
<b>II.</b>	<b>Strategic Elements</b>	<b>2</b>
<b>III.</b>	<b>Operational Planning Elements</b>	<b>29</b>
<b>IV.</b>	<b>Coordination with Unified State Plan Programs</b>	<b>57</b>
<b>V.</b>	<b>Common Assurances</b>	<b>59</b>
<b>VI.</b>	<b>Program Specific State Plan Requirements</b>	<b>61</b>

For public understanding and participation, we provided the guide to the essential components required for submitting the Unified State Plan, identified by the OMB Control Number 1205-0522. The Unified State Plan outlines how federal funds will be utilized for workforce development programs within each state. During the Public Comment period, stakeholders, including the public, are invited to provide feedback on the proposed plan.

Upon the conclusion of the Public Comment period, the final approval process commences. The approved Unified State Plan will be formatted to meet the specifications of the state plan portal. This online portal serves as the platform for electronic submission and ensures consistency in document structure and presentation.

## I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

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

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

The Commonwealth of the Northern Mariana Islands (CNMI) Workforce Innovation and Opportunity Act Core programs has elected to submit a Unified State Plan for Program Year 2024-2027. This plan includes the following core programs that are implemented in the CNMI: Title I - Adult, Dislocated Worker, and Youth programs; Title II - Adult Education and Family Literacy Act; and Title IV - Vocational Rehabilitation programs.

**B. Plan Introduction or Executive Summary** - *The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.*

As we embark on the strategic journey to craft the Unified State Plan for the Commonwealth of the Northern Mariana Islands (CNMI), our commitment is anchored in the overarching vision to seamlessly integrate a workforce development system that not only meets but exceeds the needs of our employers, job seekers, and youth. Considering the distinctive economic dynamics of the CNMI, our strategic planning initiatives engage in a thorough examination of the present economic landscape. This plan is the blueprint of our efforts, unveiling the challenges and opportunities inherent in our economy. The vision set before us is clear - to establish a workforce development system that is agile, responsive, and precisely attuned to the demands of our dynamic economy. Through our strategic planning elements covered in this Unified State Plan, our shared goal is to provide our community with quality employees, promoting a robust, resilient alignment between the workforce and the evolving needs of the CNMI.

## II. STRATEGIC 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. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.*

**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.*

The resounding impact of the pandemic has reverberated through every sector, particularly those reliant on tourism as a vital economic catalyst. As we navigate the aftermath, it becomes imperative to assess the current economic conditions, acknowledging the challenges and identifying the opportunities that lie ahead. By aligning our economic conditions, development strategies, and labor market dynamics with the objectives of our Unified State Plan, we aspire to navigate a path that not only rebuilds but propels our CNMI towards a resilient, inclusive, and prosperous post-COVID era.

Tourism remains the cornerstone of the CNMI's economy, drawing visitors to its pristine beaches, historical sites, and vibrant culture. The CNMI's economic fortunes are intricately tied to visitor arrivals. Fluctuations in international travel patterns, global economic conditions, and unforeseen events, directly impact the CNMI's economic stability.

The tourism sector, encompassing hospitality, leisure, and related services, is a major contributor to the region's Gross Domestic Product (GPD). According to the January 2023 report from the U.S. Department of Commerce Bureau of Economic Analysis, the private sector was the primary source of decline in real GPD in 2019. A decrease of 12.4% resulting from the decline in accommodations, food services, and amusements. The gaming industry experienced a substantial decline of over 80% in 2019, correlated with the decrease in visitor arrivals.

Recent trends suggest a diversification, with efforts to attract not only leisure tourists but also business travelers and those seeking unique cultural experiences. This diversification aims to enhance the resilience of the tourism sector against external shocks.

Recognizing the needs for sustainable practices, there is a growing trend toward ecotourism initiatives. The CNMI is capitalizing on its natural beauty, promoting responsible tourism to safeguard its unique ecosystems while appealing to conscientious travelers.

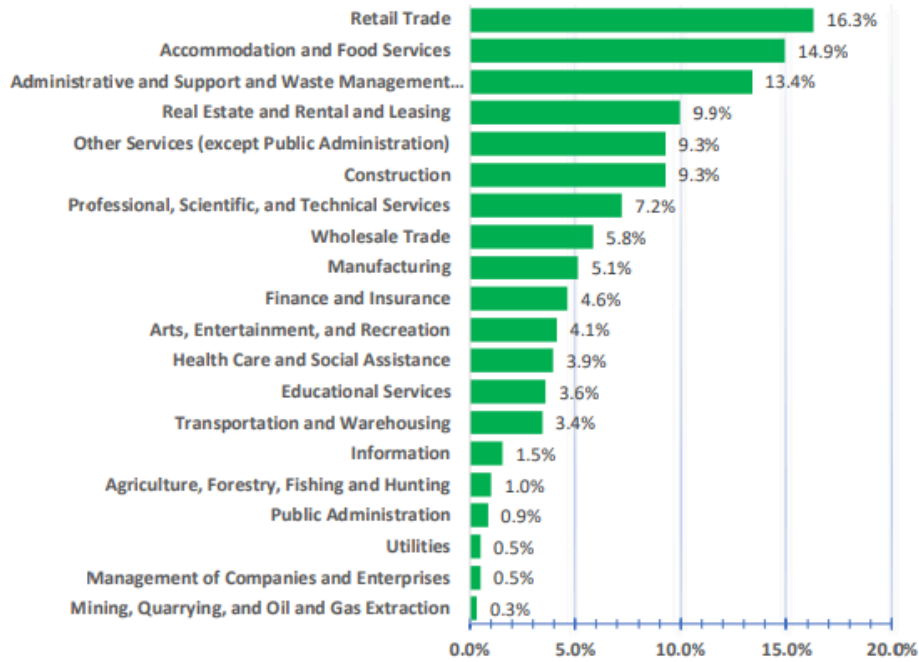
***Existing and Demand Industry Sectors and Occupations - Provide an analysis of the industries and occupations for which there is existing demand.***

The existing demand for industry sectors and occupations plays a pivotal role in understanding the current dynamics of our workforce and economic ecosystem. In this overview, we explore the key sectors and occupations that exhibit robust demand, shaping the employment landscape in the CNMI.

Annually, the CNMI's Department of Commerce Central Statistics Division conducts the Prevailing Wage Study (PWS) in accordance with the Northern Mariana Islands U.S. Workforce Act of 2018 (Public Law 115-218). The study aims to determine existing occupations, prevailing wage rates, and assess the landscape of various occupations within the CNMI. In the 2023 PWS, a total of 583 private and public sector employers participated in the study reporting a total of 14,557 employees.

The study's findings, as highlighted in Chart 3.a of the 2023 PWS, shed light on the distribution of employers across major industries, providing a comprehensive view of the existing demand industries. The top 5 major employers by industry are Retail Trade at 16%; Accommodation and Food Services at 14.9%; Administrative and Support and Waste Management and Remedial Services at 13.4%; Real Estate and Rental and Leasing at 9.9%; and Other Services (except Public Administration) at 9.3%. Chart.3.a below provides the full details of the survey respondents by industries:

**Chart 3.a Percentage of Total Employers by Major Industry:  
2023 PWS, CNMI**



A comprehensive report of the CNMI’s existing demand occupations in the CNMI based on the respondents of the study was reported in the 2023 PWS, Table 2.0 detailing the count of employers, total employees, and median hourly wage by existing occupations in demand.

**Table 2.0 Hourly Wage Statistics by Major Occupation Titles: 2023 PWS, CNMI**

Major Occupation Title	Employers Count	of Total Employers	Employees Count	of Total Employees	Hourly Wage	Hourly Wage
<b>Grand Total</b>	583	100.0%	14,557	100.0%	\$14.03	\$10.50
Architecture and Engineering Occupations	36	6.2%	155	1.1%	\$20.05	\$17.70
Arts, Design, Entertainment, Sports, and Media Occupations	29	5.0%	103	0.7%	\$13.88	\$10.10
Building and Grounds Cleaning and Maintenance Occupations	126	21.6%	688	4.7%	\$8.46	\$7.93
Business and Financial Operations Occupations	156	26.8%	866	5.9%	\$16.50	\$15.14
Community and Social Service Occupations	12	2.1%	459	3.2%	\$14.91	\$12.98
Computer and Mathematical Occupations	34	5.8%	148	1.0%	\$18.63	\$16.94
Construction and Extraction Occupations	52	8.9%	362	2.5%	\$11.24	\$9.76
Educational Instruction and Library Occupations	25	4.3%	1,117	7.7%	\$17.79	\$15.45
Farming, Fishing, and Forestry Occupations	7	1.2%	59	0.4%	\$13.05	\$11.81
Food Preparation and Serving Related Occupations	99	17.0%	1,146	7.9%	\$8.65	\$8.17
Healthcare Practitioners and Technical Occupations	16	2.7%	516	3.5%	\$33.07	\$18.32
Healthcare Support Occupations	18	3.1%	149	1.0%	\$11.79	\$11.00
Installation, Maintenance, and Repair Occupations	185	31.7%	1,313	9.0%	\$10.50	\$9.00
Legal Occupations	15	2.6%	98	0.7%	\$30.22	\$28.85
Life, Physical, and Social Science Occupations	12	2.1%	161	1.1%	\$16.26	\$13.46
Management Occupations	352	60.4%	1,401	9.6%	\$24.57	\$21.63
Office and Administrative Support Occupations	250	42.9%	2,592	17.8%	\$11.27	\$10.00
Personal Care and Service Occupations	68	11.7%	265	1.8%	\$9.69	\$8.00
Production Occupations	85	14.6%	382	2.6%	\$10.70	\$8.76
Protective Service Occupations	35	6.0%	1,065	7.3%	\$11.93	\$11.25
Sales and Related Occupations	164	28.1%	710	4.9%	\$9.32	\$8.38
Transportation and Material Moving Occupations	125	21.4%	802	5.5%	\$9.49	\$8.39

Despite the economic impacts, a comparison between the 2023 and 2022 PWS reveals notable consistency in existing demand occupations across both years. The top three occupations identified in the studies are: Office and Administrative Support Occupations; Management Occupations; and Installation, Maintenance, and Repair Occupations. A year

over year growth of 11.38% in Office and Administrative Support Occupations; 8.27% Management Occupations; and 6.31% in Installation, Maintenance, and Repair Occupations.

While the analysis highlights optimistic outlook for certain industries and occupations, it also emphasizes the need for ongoing monitoring and adaptation. The CNMI's economy is susceptible to fluctuations and must be cognizant to the emerging trends is crucial for sustaining growth and ensuring the resilience of the workforce.

***Emerging Demand Industry Sectors and Occupations - Provide an analysis of the industries and occupations for which demand is emerging.***

In this analysis, we explore the emerging demand in industries and occupations, drawing insights from the FY2023 data of the Division of Employment Services under the Department of Labor and the infusion of federal dollars for infrastructure development. This dual-source approach provides a comprehensive understanding of the evolving employment opportunities, aligning with both local needs and broader economic trends of tomorrow's workforce.

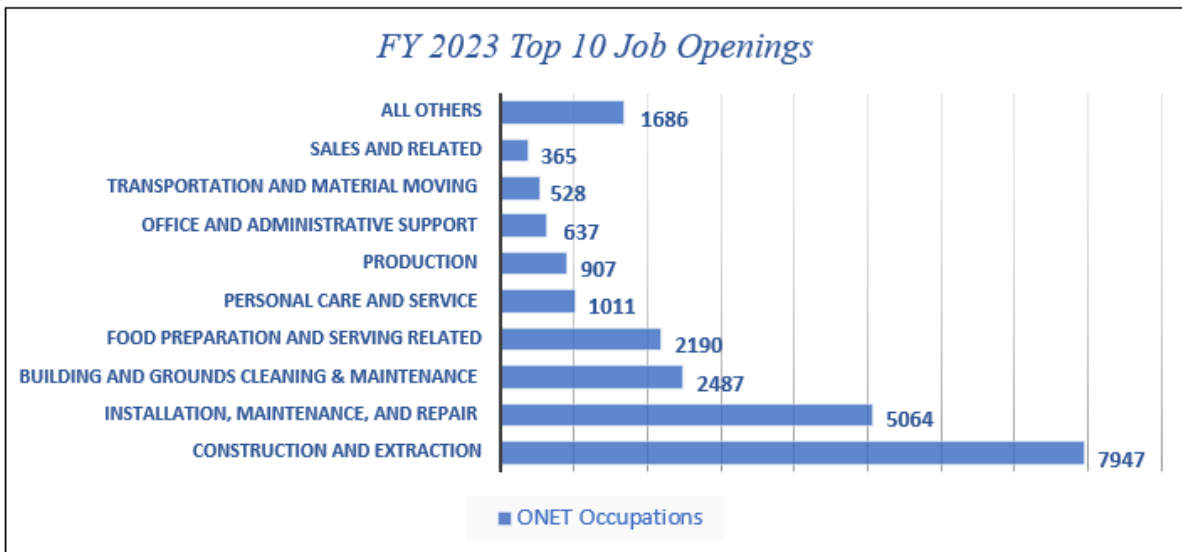
The transition from the previous CNMI foreign worker permit system to the U.S. immigration system, Congress enacted the Consolidated Natural Resources Act of 2008 (CNRA, Public Law 110-229). This legislation established the Commonwealth of the Northern Mariana Islands CNMI-Only Transitional Worker, commonly known as CW-1. The CW-1 program enables employers in the CNMI to apply with the United States Citizenship and Immigration Services (USCIS) to hire individuals who would otherwise be ineligible for employment under other non-immigrant worker categories.

Furthermore, the CW-1 program received an extension under the Northern Marianas Islands U.S. The Workforce Act of 2018, Public Law 115-218. This extension prolonged the immigration transition period, now set to continue through December 31, 2029. This extension holds significant importance for the CNMI, especially as industries relying on skilled workers under this visa category are currently experiencing a resurgence in demand.

The gradual phase-out of the CW-1 visa program in the CNMI has instigated a notable shift in the demand for skilled professionals within a specific industry sector and occupation. One industry experiencing a surge in demand is Construction, where the reliance on CW-1 visa holders was previously significant. The shift away from this visa program has prompted local businesses to seek alternative solutions, leading to an increased demand for skilled workers within construction.

The Division of Employment Services (DES) within the CNMI's Department of Labor disclosed a notable increase in job opportunities according to its FY2023 Citizen Centric Report (CCR). In comparison to the FY2022 CCR, there was a significant surge of 30% in Job Vacancy Announcements and a remarkable 40% rise in the number of Job Openings.

In the Fiscal Year 2023 report provided by the Department of Employment Services (DES), a total of 22,822 job openings were documented. The top five occupational groups with the highest job openings are as follows: 1. Construction and Extraction, 2. Installation, Maintenance, and Repair, 3. Building and Grounds Cleaning & Maintenance, 4. Food Preparation and Serving Related, and 5. Personal Care and Service. The accompanying graph illustrates the distribution of these job openings as posted on the job bank at [marianaslabor.net](http://marianaslabor.net)



The Bipartisan Infrastructure Law, enacted by the Biden-Harris Administration, has been instrumental in providing the CNMI with a substantial financial injection of \$114.4 million. This funding is specifically earmarked for crucial projects encompassing transportation, clean energy, affordable high-speed internet, and various other infrastructure improvements. As these initiatives unfold, they are not only transforming the physical landscape but are also catalysing the emergence of demand in specific industry sectors and occupations.

Infusion of funds into transportation projects is fostering growth in related occupations, such as logistics, engineering, and construction. The emphasis on affordable high-speed internet is not only enhancing connectivity but also generating a demand for professionals in information technology, network management, and cybersecurity.

As the CNMI undergoes this transformative phase, it is essential for workforce development initiatives to align with the evolving demands of these sectors. Investing in training programs and educational opportunities that cater to the specific skills required in clean energy, technology, and infrastructure-related occupations will be pivotal to meet the demands of the emerging industry landscape, ultimately contributing to sustainable economic growth in the region.

***Employers' Employment Needs*** - *With regard to the industry sectors and occupations identified in Existing and Emerging Demand Industry Sectors and Occupations, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.*

The top five major employers by industry and the most sought-after occupational groups provide critical insights into the knowledge, skills, and abilities required, including credentials and licenses. Additionally, the impact of the Bipartisan Infrastructure Law on specific industry sectors further underscores the dynamic nature of employment needs.

Major Employers by Industry:



- Retail Trade (16%):  
*Skills and Abilities:* Customer service, inventory management, and sales expertise.  
*Credentials and Licenses:* Retail-specific certifications may be beneficial.
- Accommodation and Food Services (14.9%):  
*Skills and Abilities:* Hospitality, culinary expertise, and customer service.  
*Credentials and Licenses:* Food safety certifications and hospitality industry credentials.
- Administrative and Support and Waste Management and Remedial Services (13.4%):  
*Skills and Abilities:* Administrative, organizational skills, and waste management expertise.  
*Credentials and Licenses:* Certifications in waste management practices may be advantageous.
- Real Estate and Rental and Leasing (9.9%):  
*Skills and Abilities:* Real estate knowledge, negotiation, and communication skills.  
*Credentials and Licenses:* Licensing for real estate professionals.
- Other Services (except Public Administration) (9.3%):  
*Skills and Abilities:* Varied, depending on the nature of the service.  
*Credentials and Licenses:* Service-specific certifications and licenses.

#### Occupational Groups with High Job Openings:

- Construction and Extraction:  
*Skills and Abilities:* Technical construction skills, knowledge of safety protocols.  
*Credentials and Licenses:* Certifications in relevant construction trades.
- Installation, Maintenance, and Repair:  
*Skills and Abilities:* Technical proficiency, troubleshooting, and problem-solving.  
*Credentials and Licenses:* Certifications in specific repair areas.
- Building and Grounds Cleaning & Maintenance:  
*Skills and Abilities:* Knowledge of cleaning and maintenance, attention to detail.  
*Credentials and Licenses:* Relevant certifications for specialized tasks.
- Food Preparation and Serving Related:  
*Skills and Abilities:* Culinary skills, food safety knowledge, customer service.  
*Credentials and Licenses:* Food safety certifications.
- Personal Care and Service:  
*Skills and Abilities:* Personal care expertise, interpersonal and communication skills.  
*Credentials and Licenses:* Licensing for specific personal care professions.

#### Impact of Bipartisan Infrastructure Law:

*Skills and Abilities:* Industry-specific skills related to transportation, clean energy, and information technology.

*Credentials and Licenses:* Potential certifications or licenses for roles in the clean energy, transportation sectors, and information technology.

Strategic Considerations for Workforce Development:

- Tailoring Educational Programs: Designing programs that address specific skill needs highlighted in major industries and occupational groups.
- Collaboration with Industry Stakeholders: Engaging with employers and industry associations to ensure educational offerings meet current and future demands.
- Monitoring Job Trends: Regularly updating the assessment to adapt workforce development strategies based on evolving trends.

In conclusion, this assessment serves as a valuable roadmap for educational institutions, policymakers, and workforce development agencies, ensuring that initiatives are strategically aligned with the dynamic employment needs of the CNMI. The infusion of funds from the Bipartisan Infrastructure Law further accentuates the need for agility in preparing the workforce for emerging opportunities in evolving industry sectors.

**Workforce Analysis** - *The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II.*

The CNMI's workforce embodies a myriad of skills, demographics, and aspirations intricately woven into the fabric of economic vitality. This analysis serves as a compass, navigating through the complexities of the CNMI's present workforce dynamics. Our aim is to illuminate pathways for inclusive growth, target training, and purposeful interventions outlined in our Unified State Plan.

**Employment and Unemployment** - *Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.*

The primary source for the latest comprehensive data on employment and unemployment in the CNMI is the CNMI 2020: Decennial Census of Islands (DECIA), officially released in July 2023. This report provides a detailed analysis of employment and unemployment characteristics, including labor participation rates and trends.

## Employment

Within the population of residents 16 years and older, 53.0% (18,759 individuals) were employed across various occupations, distributed as follows::

- Management, business, science, arts occupations 28.4%
- Service occupations 24.6%
- Sales and office occupations 20.0%
- Natural resources, construction, and maintenance occupations 16.4%
- Production, transportation and material moving occupations 10.6%

The majority, or 72.0%, were employed in the private sector; 25.7% in the public sector; and 2.3% were self-employed. Median earnings varied, with male full-time workers earning a median of \$18,857 and female full-time workers earning \$20,090.

## Unemployment

The CNMI's unemployment rate stands at 14.1%, while the Labor Force Participation Rate is reported at 61.7%.

## Trends

Analyzing the employed population (18,759 civilian employed population 16 years of age and older) from the CNMI 2020 DECIA, the distribution across industries is as follows:

Arts, Entertainment, Recreation, Accommodation, and Food Services	20.3%
Educational Services, Health Care, and Social Assistance	12.4%
Public Administration	12.0%
Construction	11.7%
Retail Trade	11.3%
Professional, Scientific, Management, and Administrative and Waste Management Services	8.7%
Transportation and Warehousing, and Utilities	7.2%
Finance, Insurance, Real Estate, Rental and Leasing	4.1%
Other Services, Except Public Administration	3.9%
Wholesale Trade	3.0%
Manufacturing	2.2%
Information	2.1%
Agriculture, Forestry, Fishing and Hunting, and Mining	0.9%

***Labor Market Trends*** - Provide an analysis of key labor market trends, including across existing industries and occupations.

The FY2023 End Report from the Division of Employment Services at the Department of Labor highlights a consistent trend in job openings over the past five years. Notably, occupations in Construction and Extraction, Installation, Maintenance, and Repair, Building and Grounds Cleaning & Maintenance, Food Preparation and Serving Related Occupations, and Personal Care and Service have consistently emerged as the most sought-after. This enduring trend signifies the sustained demand for skilled professionals in these sectors,

reflecting the CNMI's commitment to robust infrastructure, technological maintenance, cleanliness, hospitality, and personal well-being. The reliability of these trends underscores the resilience and growth potential within existing industries, providing valuable insights for workforce planning and development initiatives.

***Job Openings (Fiscal Year Comparison Data by ONET Code Occupations)***

No. of Job Openings: FY 2019, 2020, 2021, 2022, and 2023					
By ONET Code: Occupations	FY 2019 No. of Job Openings	FY 2020 No. of Job Openings	FY 2021 No. of Job Openings	FY 2022 No. of Job Openings	FY 2023 No. of Job Openings
Construction and Extraction	7841	7696	5024	8656	7947
Installation, Maintenance, and Repair	6143	3652	3551	2640	5064
Building and Grounds Cleaning & Maintenance	4160	2465	1913	1582	2487
Food Preparation and Serving Related	3709	2049	1504	1341	2190
Production	1177	568	376	237	907
Business and Financial Operations	1296	708	444	387	283
Personal Care and Service	2976	1777	917	750	1011
Management	1601	625	253	114	172
Architecture and Engineering	368	329	161	205	224
Office and Administrative Support	1056	597	401	243	637

Arts, Design, Entertainment, Sports, and Media	511	214	64	43	85
Education, Training, and Library	277	88	74	46	64
Healthcare Practitioners and Technical	588	686	585	365	422
Transportation and Material Moving	1207	518	460	269	528
Sales and Related	1960	889	436	323	365
Farming, Fishing, and Forestry	259	85	92	71	63
Computer and Mathematical	291	81	62	47	41
Healthcare Support	214	149	91	59	164
Protective Service	376	246	199	143	91
Life, Physical, and Social Science	26	10	3	6	60
Community and Social Services	36	23	10	11	15
Legal	38	24	12	0	2
<b>TOTAL:</b>	<b>36110</b>	<b>23479</b>	<b>16652</b>	<b>17558</b>	<b>22822</b>

***Education and Skill Levels of the Workforce - Provide an analysis of the educational and skill levels of the workforce.***

The education and skill level of the workforce in the Commonwealth of the Northern Mariana Islands (CNMI) is shaped by the outputs of the public, private, and postsecondary education

and training systems. The key institutions contributing to the workforce development include the CNMI's Public School System (PSS), Northern Marianas College (NMC), Northern Marianas Technical Institute (NMTech), and other private training institutions namely Guam Marianas Training Center, Latte Training Academy, and Island Training Solutions.

#### Secondary Education - Public School System

In the academic year 2021-2022, the CNMI's Public School System (PSS) reported a total of 733 graduates, as documented in their FY2023 Citizen Centric Report. A key metric highlighted by PSS is the graduation rate, with 75% of students completing their secondary education within the standard four-year timeframe.

#### Post-Secondary Credentials - Northern Marianas College

The CNMI's lone post secondary school, Northern Marianas College (NMC), conferred a total of 374 individuals attaining the following credentials:

- 74 Bachelors Degrees
- 170 Associate Degrees
- 90 Certificate of Completion in various specialized workforce programs
- 40 Adult School Program Diploma

#### Vocational and Trade Programs - Northern Marianas Technical Institute (NMTech)

NMTech plays a crucial role in preparing students for the workforce through technical and trades education.

At the CNMI's technical and trades institution, Northern Marianas Technical Institute (NMTech) a total of 187 students were enrolled in 2023. As reported in their 2023 annual report, 66 students were conferred in various trades increasing their employability for the workforce.

In summary, the educational and skill landscape of the Commonwealth of the Northern Mariana Islands (CNMI) is intricately shaped by the collaborative efforts of key institutions in the region. The CNMI's Public School System (PSS) has been a pivotal source of secondary education, with a commendable graduation rate of 75% in the academic year 2021-2022. Transitioning to post-secondary education, Northern Marianas College (NMC) has played a crucial role, conferring a diverse array of credentials, including Bachelors and Associate Degrees, Certificates of Completion, Adult School Program Diplomas, and HISET High School Equivalency Diplomas, totaling 374 individuals. Complementing this, the Northern Marianas Technical Institute (NMTech) has been instrumental in preparing students for the workforce through vocational and trade programs, with 187 students enrolled in 2023 and 66 students conferred in various trades. As these institutions collectively contribute to shaping a skilled and educated workforce, their efforts underscore the integral role education plays in fostering economic growth and development in the CNMI.

***Comparison of Economic and Workforce Analytical Conclusion - Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.***

The examination of the Commonwealth of the Northern Mariana Islands' (CNMI) economic landscape has unveiled notable opportunities for aligning hiring, education, and skills needs with the available assets in the labor force. The delineation of these opportunities stems from a meticulous analysis of industry demands and the inherent capabilities of the workforce. Among the identified areas of promise, the retail trade sector stands out as a substantial opportunity, representing 16% of major employers. Accommodation and Food Services, Administrative and Support and Waste Management and Remedial Services, Real Estate and Rental and Leasing, and Other Services (except Public Administration) also present significant prospects, collectively constituting a diverse array of sectors crucial to the CNMI's economic vibrancy.

In tandem with these opportunities, an insightful examination of the labor force's assets, as revealed in the FY2023 End Report from the Division of Employment Services, unveils a consistent trend in job openings. Occupations within Construction and Extraction, Installation, Maintenance, and Repair, Building and Grounds Cleaning & Maintenance, Food Preparation and Serving Related Occupations, and Personal Care and Service consistently emerge as the most sought-after roles. This alignment signifies a symbiotic relationship between industry demands and the inherent skills within the labor force.

The identified areas of opportunity align with the current strengths of the labor force, paving the way for strategic synergy between hiring needs and available assets. For instance, the demand for skilled professionals in construction, maintenance, and service-related occupations aligns seamlessly with the labor force's demonstrated proficiency in these domains. This alignment not only capitalizes on the inherent skills of the local workforce but also presents a strategic avenue for educational and skills development initiatives to further enhance the capabilities of the labor pool.

As the CNMI positions itself for economic growth and resilience, the synthesis of identified opportunities and the assets inherent in the labor force sets the stage for targeted interventions. Strategic workforce planning, education, and skills development initiatives can be designed to bridge any existing gaps, fostering a harmonious relationship between industry demands and the capabilities of the local workforce. This proactive approach not only addresses current needs but also fortifies the CNMI's economic foundation, ensuring that hiring, education, and skills development efforts coalesce for sustained prosperity and resilience in the evolving economic landscape.

***Workforce Development, Education, and Training Analysis - 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 Economic and Workforce Analysis above, and the employment needs of employers, above.***

The CNMI's workforce development activities represent a multifaceted approach aimed at addressing the needs of individuals seeking education and skills development to match their skills with employers cultivating a skilled, adaptable, and inclusive workforce. Rooted in the

principles of the Workforce Innovation and Opportunity Act (WIOA), the strategies of the CNMI's core programs converge on providing comprehensive support across the spectrum of education, training, and employment services to bridge the gap between the education and skills of the workforce and the specific demands of employers.

Under WIOA Title I, workforce investment activities focus on empowering individuals to navigate their career journeys successfully. Robust career services, including job search assistance, counselling, and training, are deployed to equip participants with the skills and knowledge needed for gainful employment. Collaboration with employers is integral, aligning training programs with industry demands to ensure workforce readiness. The state places a premium on performance accountability, measuring outcomes such as employment retention and earnings gains to continuously refine and enhance program effectiveness.

WIOA Title II directs the attention to adult education and literacy, recognizing the pivotal role of foundational skills in employability. Adult education programs, including ESL and basic education, are designed to elevate literacy levels and prepare individuals for workforce integration. The CNMI promotes the seamless integration of Title II with Title I, fostering a cohesive pathway for individuals to progress from education to employment. Collaborative efforts with employers ensure that adult education curricula align with industry needs, fostering relevance and applicability.

WIOA Title IV guides the CNMI's approach to vocational rehabilitation services for individuals with disabilities. The state prioritizes individualized plans tailored to the unique needs and aspirations of individuals with disabilities. Transition services for youth, emphasizing the journey from school to employment, further underline the CNMI's commitment to inclusivity and equal opportunities. Collaborations with employers are actively pursued to create supportive workplaces that value the contributions of individuals with disabilities.

Throughout these activities, cross-cutting themes emerge, such as coordination across titles to create a seamless workforce development system. Employer engagement and alignment with industry needs remain central, reflecting a commitment to responsive, market-driven training programs. The emphasis on performance measurement and accountability ensures that outcomes are tracked, assessed, and used to enhance the impact of workforce development initiatives.

***The State 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.***

In the intricate landscape of workforce development, the collective efforts of the State Workforce Development Board, in tandem with the comprehensive initiatives under WIOA's Titles I, II, and IV, form a framework dedicated to shaping the future of the workforce in the CNMI. United in purpose, we maximize our expertise and resources to drive impactful workforce development activities. The State Workforce Development Board orchestrates strategic plans and fosters collaboration among stakeholders. WIOA Titles I, II, and IV contribute significant components, addressing employment needs, adult education and literacy, and vocational rehabilitation, respectively. This unified front not only reflects a commitment to a holistic workforce enhancement but also exemplifies collaboration poised to navigate the challenges and opportunities of a dynamic labor landscape. Together, we air to



forge a pathway towards a skilled, resilient, and inclusive workforce tailored to the evolving needs of our community and the demands of a competitive economy.

### **State Workforce Development Boards (SWDB)**

The activities of the Workforce Innovation and Opportunity Act (WIOA) State Workforce Development Board are multifaceted, encompassing a spectrum of initiatives aimed at enhancing the education and training landscape within the state. The board plays a pivotal role in setting strategic priorities, guiding policy development, and fostering collaboration among key stakeholders. In the realm of education, the board engages in needs assessments to identify gaps and opportunities within the workforce. It actively promotes the alignment of education and training programs with the evolving demands of the job market, ensuring that educational initiatives are closely attuned to industry needs.

Training activities are a cornerstone of the board's efforts, where it collaborates with educational institutions, employers, and training providers to design and implement effective training programs. These programs are crafted to equip individuals with the skills and competencies demanded by the current job market, fostering a workforce that is not only capable but also adaptable to emerging industry trends.

Additionally, the board works to enhance access to education and training opportunities for diverse populations, fostering inclusivity and addressing disparities. It may advocate for the development of targeted programs for underrepresented groups, ensuring that the benefits of education and training are accessible to all segments of the community.

Monitoring and evaluating the effectiveness of education and training initiatives are integral aspects of the board's responsibilities. By assessing the outcomes of programs, the board can make informed decisions about resource allocation, program refinement, and strategic adjustments to better meet the evolving needs of the workforce.

In summary, the WIOA State Workforce Development Board actively shapes the educational and training landscape by setting strategic priorities, fostering collaboration, promoting alignment with industry needs, and ensuring inclusivity. Through these activities, the board contributes to the development of a skilled, adaptable, and inclusive workforce capable of meeting the demands of a dynamic job market.

### **Title I Adult, Dislocated Worker, and Youth Programs:**

Title I provides funding for adult, dislocated worker, and youth programs, offering a range of services such as training, education, and supportive services. These programs are designed to enhance employability, address skills gaps, and connect individuals with employment opportunities in high-demand industries.

**Basic Career Services** form the fundamental building blocks of the Workforce Innovation and Opportunity Act (WIOA), providing essential support to individuals seeking employment. These services encompass a range of foundational components, including job search assistance, career exploration, resume development, and interview preparation. Job seekers receive access to up-to-date labor market information, basic skills assessments, and referrals to training and education programs tailored to their career goals. WIOA Basic Career Services also offer insights into supportive services, such as transportation assistance,

and connect individuals to job fairs and networking events. These services serve as a vital entry point, equipping individuals with the necessary tools and guidance to navigate the job market effectively while laying the groundwork for potential further engagement with additional WIOA core services and training opportunities.

**WIOA Individualized Career Services** activities within the Workforce Innovation and Opportunity Act (WIOA) are tailored to meet the distinct needs of individuals, providing personalized support for career development and employment success. These services encompass specialized assessments to identify unique skills, interests, and career aspirations. Individualized career planning and counseling offer in-depth guidance, helping individuals make informed decisions about their professional journeys. The services extend to comprehensive skills development, offering targeted training programs aligned with specific career goals. Additionally, individualized career services address unique challenges by providing support services tailored to individual circumstances. By offering a customized approach, WIOA Individualized Career Services strive to optimize the potential for successful and sustainable employment outcomes, promoting long-term career growth and economic self-sufficiency for individuals.

**Follow-Up Services** focuses on sustaining and enhancing the success of individuals who have participated in workforce development programs. These services involve continuous engagement and support after initial training or employment placements. WIOA Follow-Up Services aim to assess individuals' progress, address any emerging challenges, and provide ongoing assistance to ensure job retention and career advancement. Through periodic check-ins, additional training opportunities, and referrals to support services, these follow-up services contribute to the long-term success and stability of participants in the workforce, fostering economic self-sufficiency and sustained professional growth.

**Business Services** activities focuses on fostering strong partnerships between employers and the workforce system. These services are designed to meet the diverse needs of businesses by providing tailored solutions such as talent recruitment, workforce training programs, and support for staff development. WIOA Business Services act as a bridge, connecting employers with qualified individuals, facilitating access to labor market information, and offering resources to enhance workforce productivity. Additionally, these activities promote collaboration between businesses and educational institutions to ensure that training programs align with industry demands. By addressing the unique requirements of businesses, WIOA Business Services contribute to economic growth, job creation, and the development of a skilled and adaptable workforce.

## **Title II - Adult Education and Literacy:**

The activities of the CNMI's Adult Education State Office (ABE) are centered on meeting the educational needs of adult learners. ABE offers several programs to provide the educationally disadvantaged adults of the community the opportunities to acquire basic skills necessary to function more effectively and productively, to gain upward mobility, and to provide the opportunities that will prepare them to pursue further education and/or enter the workforce. ABE activities include:

- Addressing the foundational skills needed for employment. These programs aim to improve the English language proficiency and literacy levels of individuals, enhancing their ability to access and succeed in the workforce.

- Title II promotes Integrated Education and Training (IET) models, where adult education is combined with occupational skills training. This integration ensures that learners acquire both academic and job-specific skills, increasing their competitiveness in the job market.
- Through Title II programs, collaboration with employers is encouraged to identify specific skills required in the workforce. This collaboration ensures that adult education and literacy programs align with the current needs of industries and businesses.

#### **Title IV – Office of Vocational Rehabilitation (OVR):**

The Office of Vocational Rehabilitation plays a critical role in workforce development by addressing the unique needs of individuals with disabilities. The program aims to enhance their employability and facilitate their integration into the workforce. Key features of OVR's workforce development activities include:

- OVR focuses on providing vocational rehabilitation services to individuals with disabilities. These services aim to enhance the employability of individuals with disabilities by addressing barriers to employment and facilitating their participation in the workforce.
- OVR emphasizes collaboration with employers and industry partners to create inclusive workplaces. Vocational rehabilitation services are tailored to align with the needs of employers, promoting diversity and inclusion in the workforce.
- Includes provisions for transition services, supporting youth with disabilities as they transition from education to employment. This ensures a seamless integration into the workforce and fosters long-term career success.

The workforce development activities of the CNMI's core programs collectively form a comprehensive framework for building a skilled, inclusive, and adaptable workforce. By addressing the needs of various populations and fostering collaboration with employers, these programs contribute to the overall economic growth and vitality of communities throughout the CNMI.

***The Strengths and Weaknesses of the Workforce Development Activities - Provide an analysis of the strengths and weaknesses of the workforce development activities identified, directly above.***

Described below are the strengths and weaknesses of the CNMI's core programs workforce development activities.

Strengths:

- Each program offers a comprehensive tailored approach to workforce development providing individuals access to a range of services, from career services to specialized vocational rehabilitation for individuals with disabilities.

- Services are focused on increasing the skills of individuals to meet the demands of the job market, creating a more competitive and adaptable workforce.
- Inclusivity to address the needs of various demographic groups contributing to a more equitable distribution of workforce resources.
- Business services foster collaboration between core programs, aligning training initiatives with industry needs.

Weaknesses:

- Fragmentation and coordination challenges requiring enhanced communication and integration efforts to ensure a cohesive and streamlined approach.
- Resource limitations may limit the scope of workforce development activities.
- Disparities in digital literacy and access to technology.
- Rapid technological changes that may create skills gap to upkeep with the evolving demands on industries reliant on emerging technologies.

In conclusion, while WIOA's core programs demonstrate strengths in their comprehensive approach, customization, and collaboration with employers, addressing weaknesses such as coordination challenges, resource limitations, and accessibility barriers will be crucial for optimizing the impact of workforce development activities. Continuous refinement and adaptation to changing economic landscapes are essential for ensuring the long-term success of these programs.

***State Workforce Development Capacity*** - Provide an analysis of the capacity of State entities to provide the workforce development activities identified above.

Collectively, the CNMI's core programs aim to empower individuals for success in the job market. The core programs have the capacity to tailor solutions to labor market needs, offering diverse services from basic counseling to on-the-job training. Challenges include resource allocation and coordination complexities. Title II addresses fundamental literacy and numeracy needs, integrating with Title I to support individuals on their journey towards workforce readiness. Title IV specializes in services for individuals with disabilities, fostering inclusive workplaces through employer collaboration. Challenges involve navigating the spectrum of disabilities and sustaining employer engagement. Common considerations include the integration of technology for extended service reach and standardizing metrics for outcome measurement. In conclusion, these programs, while facing challenges, possess substantial capacity and are poised to shape a resilient and future-ready workforce through strategic collaboration and technology integration.

**State Strategic Vision and Goals** - *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-*

**Vision and Goals** - *Describe the State's strategic vision for its workforce development system. (1) 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—*

In pursuit of our strategic vision to integrate a seamless workforce development system that caters to the unique needs of the CNMI, our goals are meticulously aligned with a comprehensive analysis of the State's economic conditions, current workforce dynamics, and ongoing workforce development initiatives. Our objectives involve preparing an educated and skilled workforce that is inclusive and addresses the needs of diverse populations such as youths, individuals facing barriers to employment (displaced homemakers, low-income individuals, individuals with disabilities, older individuals, ex-offenders, homeless individuals, youths in or out of foster care, English language learners, individuals with low literacy, and those with substantial cultural barriers), as well as single parents including pregnant women, long-term unemployed individuals. Demonstrating dedication, we extend our commitment to providing tailored support for Veterans, unemployed workers, and youths, as well as any other underrepresented or marginalized groups.

Concurrently, we aim to meet the specific skilled workforce needs of employers, ensuring a direct alignment between the skills acquired by our workforce and the demands of our economy. The stated goals below for the CNMI's public workforce systems is focused on a workforce development system that is dynamic, inclusive, and adept at sustaining economic growth and vitality of the CNMI.

**Goal 1:** Increase access to high-quality education and training programs that lead to self-sufficiency for all CNMI residents.

**Goal 2:** Foster strategic partnerships with employers to align training and education programs with industry needs, effectively bridging the skills gap in the CNMI.

**Goal 3:** Continuously enhance the effectiveness and efficiency of the public workforce system in the CNMI to better serve job seekers and employers.

**Goal 4:** Develop comprehensive and accessible career pathway opportunities for individuals in the CNMI that align with industry needs, resulting in measurable economic advancements.

**Goal 5:** Expand and enhance the availability and quality of apprenticeship programs in the CNMI to provide diverse and accessible pathways for skills development and career advancement.

**Goal 6:** Foster a public workforce system that champions diversity, equity, inclusion, and accessibility (DEIA), ensuring that all CNMI residents have equitable access to opportunities for skill development and career advancement.

**Goal 7:** Elevate services and opportunities for individuals with disabilities and other priority populations in the CNMI to ensure equitable access to education, training, and meaningful employment.

**Goal 8:** Align workforce development programs and initiatives in the CNMI to meet the evolving needs of employers, ensuring that the workforce is equipped with the skills and competencies.

**Goal 9:** Identify and mitigate barriers to employment to ensure that all individuals, including those facing significant challenges, have equal access to job opportunities and the support they need.

**Goal 10:** Strengthen the provision of supportive services to enable individuals to successfully participate in and complete training programs that lead to meaningful employment opportunities in the CNMI.

**Goal 11:** Foster a culture of continuous professional development within the public workforce system to equip staff with the skills, knowledge, and capabilities necessary for delivering high-quality and innovative services.

**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.)

**The CNMI core programs negotiate performance goals in the Spring with their respective federal entities and will be updated to reflect the approved targets for PY2024-2027.**

	Title I – Adult Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)				
Employment (Fourth Quarter after Exit)				
Median Earnings (Second Quarter after Exit)				
Credential Attainment Rate				

Measurable Skill Gains				
------------------------	--	--	--	--

	Title I – Adult Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)				
Employment (Fourth Quarter after Exit)				
Median Earnings (Second Quarter after Exit)				
Credential Attainment Rate				
Measurable Skill Gains				

	Title I – Youth Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>1</sup>				
Employment (Fourth Quarter after Exit) <sup>2</sup>				
Median Earnings (Second Quarter after Exit)				

<sup>1</sup> For Title I Youth programs, employment, education or training.

<sup>2</sup> For Title I Youth programs, employment, education or training.

Credential Attainment Rate				
Measurable Skill Gains				

	Title II – Adult Education and Family Literacy Act Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)				
Employment (Fourth Quarter after Exit)				
Median Earnings (Second Quarter after Exit)				
Credential Attainment Rate				
Measurable Skill Gains				

	Vocational Rehabilitation Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>22</sup>				
Employment (Fourth Quarter after Exit) <sup>22</sup>				
Median Earnings (Second Quarter after Exit)				



Credential Attainment Rate				
Measurable Skill Gains				

	All WIOA Core Programs			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers				

**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 and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.

Assessing the overall effectiveness of the workforce development system in the CNMI is a multifaceted process that aligns closely with the strategic vision and goals. Our approach to this evaluation is thorough and involves a comprehensive process. The workforce development system will integrate various methodologies to gain a detailed understanding of the system's impact and areas for improvement.

- **Data-Driven Assessment:**  
Our assessment begins with the collection and analysis of data through the WIOA performance indicators of performance measures for each of the core programs. We employ a combination of quantitative and qualitative measures, including customer satisfaction surveys, key performance indicators, and outcome metrics. These data sources provide insights into the achievement of specific goals, participant satisfaction, and the overall effectiveness of programs. The systematic analysis of this data allows us to identify trends, successes, and areas that may require attention.
- **Stakeholder Engagement:**  
A critical component of our assessment strategy is engaging with a diverse range of stakeholders. Work-group sessions, forums, and regular meetings with employers, educators, community leaders, and program participants provide qualitative insights. This collaborative approach ensures that the assessment process is inclusive and considers the perspectives of those directly impacted by the workforce development system. Feedback obtained through these engagements serves as a valuable complement to quantitative data, offering a more holistic view of the system's effectiveness.
- **MOU Reviews:**

Memoranda of Understanding (MOUs) form the backbone of our collaborative efforts. Regular reviews of these agreements are conducted to evaluate the alignment of activities with stated goals and objectives. These reviews help us assess the effectiveness of partnerships, identify any gaps or misalignments, and facilitate ongoing improvements in collaboration and coordination among stakeholders.

- **Continuous Improvement Framework:**  
The results of our assessment, including evaluation findings and stakeholder feedback, are integrated into a structured continuous improvement framework. A dedicated cross-functional team, representing various stakeholders, convenes to analyze the assessment results. Together, they prioritize areas for improvement, develop action plans, and allocate resources strategically. This collaborative effort ensures that improvements are targeted, evidence-based, and aligned with the overarching strategic vision.
- **Adaptive Implementation:**  
Recognizing the dynamic nature of workforce needs and economic landscapes, we prioritize an adaptive implementation approach. Regular reviews of our improvement initiatives, ongoing monitoring of key performance indicators, and feedback loops with stakeholders allow us to make real-time adjustments. This adaptability ensures that our workforce development system remains responsive to emerging challenges and opportunities.

In conclusion, our approach to assessing the overall effectiveness of the workforce development system is a dynamic and collaborative process. Through a combination of data-driven analysis, stakeholder engagement, MOU reviews, and a commitment to continuous improvement, we aim to ensure that our strategic vision and goals are not static but evolve in response to the ever-changing needs of our workforce and the broader community. This commitment to excellence positions our State at the forefront of effective and responsive workforce development initiatives.

**State Strategy** - *The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided.*

**State Strategy Implementation** - *Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23).*

To adhere to the mandates outlined in the Workforce Innovation and Opportunity Act (WIOA) section 101(d)(3)(B) and (D), the State is committed to implementing comprehensive strategies that integrate industry partnerships, particularly focusing on in-demand industry sectors and occupations. The State recognizes the critical role of strategic

collaborations in aligning education and workforce development efforts to meet the evolving needs of the job market.

#### Identification of In-Demand Industry Sectors and Occupations:

- The State will conduct thorough analyses, leveraging labor market information and data, to identify in-demand industry sectors and occupations as per WIOA section 3(23). This process will involve collaboration with local employers, industry associations, and economic development entities to ensure a comprehensive understanding of current and emerging workforce needs.

#### Development of Career Pathways:

- Embracing the WIOA definition of "Career Pathway" from section 3(7), the State will establish clear, accessible, and well-defined career pathways for individuals seeking skill development and career advancement. These pathways will encompass various educational and training milestones, including registered apprenticeships, to provide individuals with a roadmap to success in their chosen fields.

#### Industry or Sector Partnerships:

- The State will actively foster partnerships with key industry sectors, employers, and relevant stakeholders. These collaborations will involve regular engagement forums, task forces, and advisory boards that bring together representatives from education and training institutions, government agencies, and employers. This collaborative approach ensures that the workforce development system remains closely aligned with the needs of the business community.

#### Tailored Training Programs:

- To address the specific skill requirements of in-demand industry sectors and occupations, the State will develop and implement tailored training programs. These programs will be designed in consultation with industry partners to ensure that they are current, relevant, and directly contribute to closing the skills gap in identified sectors.

#### Apprenticeship Programs:

- Recognizing the value of registered apprenticeships in career pathways, the State will actively promote, expand, and enhance the availability and quality of apprenticeship programs. This will include collaboration with employers to develop apprenticeship opportunities that align with industry needs, providing individuals with practical, on-the-job training experiences.

#### Continuous Feedback Mechanisms:

- The State will establish robust feedback mechanisms, including regular surveys and consultations with industry partners. This ongoing dialogue ensures that

workforce development strategies remain agile, adapting to changes in technology, market dynamics, and employer expectations.

#### Flexibility and Innovation:

- Acknowledging the dynamic nature of industries, the State will prioritize flexibility and innovation in its strategies. This involves the incorporation of emerging technologies, adaptive curriculum development, and the exploration of innovative training models to meet the evolving demands of in-demand industry sectors.

#### Data-Driven Decision-Making:

- The State will employ data-driven decision-making processes to continually assess the effectiveness of its strategies. Regular evaluations will be conducted to measure the impact of workforce development initiatives on the attainment of career pathway goals and the fulfillment of industry demands.

In summary, the State's strategies for workforce development align with WIOA requirements by placing a strong emphasis on industry partnerships, career pathways, and the development of programs tailored to in-demand industry sectors and occupations. Through collaborative efforts and a commitment to adaptability, the State aims to build a responsive and effective workforce development system that propels individuals towards sustained career success.

***System Alignment*** - 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 above.

In the Commonwealth of the Northern Mariana Islands (CNMI), a transformative vision underscores the commitment to seamlessly integrate various components of the workforce development system. This vision emanates from the recognition that a unified and efficient approach to workforce development is paramount for the sustained growth of the CNMI. To actualize this vision, a comprehensive strategic plan has been devised, encapsulating eleven key goals that collectively form the backbone of the CNMI's workforce development system.

#### Goal 1: Increasing Access to High-Quality Education and Training Programs:

The initial goal is to enhance accessibility to high-quality education and training programs, creating pathways to self-sufficiency for all CNMI residents. This involves a commitment to inclusivity and broadening educational and training opportunities for individuals throughout the CNMI.

#### Goal 2: Fostering Strategic Partnerships with Employers:

Strategic partnerships with employers involve the alignment of training and education programs with industry needs. A proactive approach that seeks to bridge the skills gap in the CNMI, ensuring that the workforce is equipped with the relevant competencies demanded by the evolving job market.

### Goal 3: Enhancing the Effectiveness and Efficiency of the Public Workforce System:

Goal 3 centers on continuous improvement, ensuring that the public workforce system in the CNMI is effective and efficient in serving both job seekers and employers. This involves streamlining processes, leveraging technology, and optimizing resources to provide seamless services.

### Goals 4-11: Comprehensive Career Pathways, Diversity, Equity, and Inclusion, and Continuous Professional Development:

Goals 4 to 11 collectively address various dimensions of workforce development. This includes developing comprehensive and accessible career pathways aligned with industry needs, expanding and enhancing apprenticeship programs, fostering diversity, equity, inclusion, and accessibility (DEIA), elevating services for individuals with disabilities, aligning programs with evolving employer needs, and continuous professional development for the workforce system staff.

To achieve these goals, the CNMI will employ a multifaceted strategic approach. This involves:

- Establishing robust communication channels between education and training institutions, government agencies, employers, and community organizations.
- Creating task forces and collaborative platforms to facilitate dialogue and coordination among stakeholders.
- Regularly assessing the effectiveness of programs through data-driven metrics, ensuring that they align with the overarching goals and vision.
- Implementing innovative technologies to enhance service delivery, accessibility, and information dissemination.
- Prioritizing flexibility and adaptability to swiftly respond to emerging trends and industry shifts.

A robust system of metrics and key performance indicators will be established to quantifiably measure progress towards each goal. Regular evaluations and stakeholder feedback mechanisms will ensure the continuous refinement of strategies and initiatives.

In essence, the CNMI's workforce development strategy is a dynamic, interconnected framework designed to foster collaboration, inclusivity, and continuous improvement. As the CNMI envisions a future where every resident has equitable access to opportunities for skill

development and career advancement, these strategic goals provide the roadmap to turn this vision into a reality. Through sustained commitment and collaboration, the CNMI aims to build a workforce that not only meets current industry needs but is agile and future ready.

### 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 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**

**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).*

The CNMI's State Workforce Development Board (SWDB), aligning with the mandates of section 101(d) of the Workforce Innovation and Opportunity Act (WIOA), has crafted and implemented operational structures to efficiently fulfill its functions. The Board plays a pivotal role in coordinating workforce development efforts across the CNMI and utilizes a well-defined decision-making process to ensure the smooth execution of its responsibilities.

Operational Structures:

1. **Executive Leadership:** The Board operates with an executive leadership team consisting of a chairperson and key officers. This leadership oversees the overall strategic direction, ensuring that the Board's functions are in line with the goals outlined in the WIOA.
2. **Committee Structure:** To enhance efficiency and address specific focus areas, the Board has established committees that delve into critical aspects of workforce development. These committees, such as those focused on program oversight, strategic planning, and performance measurement, allow for in-depth analysis and targeted decision-making.
3. **Partnership Integration:** Recognizing the importance of collaboration, the Board integrates representatives from various stakeholders, including government agencies, educational institutions, employers, and community organizations. This diversity fosters a comprehensive and inclusive approach to decision-making.
4. **Staffing and Expertise:** The Board is supported by a dedicated staff with expertise in workforce development. This team plays a crucial role in researching, analyzing, and providing recommendations to the Board, ensuring that decisions are well-informed and aligned with best practices.

In summary, the CNMI's State Workforce Board operates with a well-structured framework that combines strategic planning, data-driven decision-making, and collaborative processes. By leveraging the expertise of its leadership, committees, and staff, the Board ensures that its functions are carried out in a manner that aligns with the overarching vision of fostering a dynamic and responsive workforce development system in the CNMI.

**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 above. This must include a description of—

**Core Program Activities** - 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.

In establishing a Memorandum of Understanding (MOU), the workforce development system aims to formalize and articulate specific responsibilities related to collaborative funding, co-enrollment strategies, data sharing, and the provision of supportive services. This MOU serves as a foundational document to clarify the commitments and collaborative initiatives agreed upon by the entities within the workforce development system for the implementation of the State's strategies.

The MOU will explicitly delineate the responsibilities of each participating entity regarding collaborative funding initiatives. This includes outlining financial commitments, resource-sharing agreements, etc. The agreement will establish how entities will pool resources, explore shared funding opportunities, and coordinate grant applications to enhance the financial sustainability of workforce development programs.

Responsibilities related to the design, implementation, and evaluation of co-enrollment strategies will be clearly outlined in the MOU. This encompasses coordination of schedules, alignment of curriculum offerings, and the development of seamless pathways for individuals participating in multiple programs. The MOU aims to foster a coordinated and integrated approach to service delivery through co-enrollment strategies.

The MOU will define comprehensive data sharing protocols to facilitate the exchange of information among entities within the workforce development system. Responsibilities related to data collection, storage, and sharing will be addressed to ensure compliance with privacy regulations. The agreement may include provisions for shared databases, analytics tools, and reporting mechanisms to enhance coordination based on real-time data insights.

Responsibilities regarding the provision of supportive services will be clearly outlined in the MOU. This includes identifying the types of supportive services to be offered, specifying eligibility criteria, and establishing coordination mechanisms to ensure individuals receive the necessary assistance. Supportive services may encompass transportation, childcare, counseling, or other resources aimed at overcoming barriers to employment and participation in workforce development programs.

Recognizing the importance of safeguarding sensitive information, the MOU will include provisions for confidentiality and security measures. Entities will agree on protocols to protect the confidentiality of shared data, ensuring responsible and ethical use. These measures are vital for building trust among the entities and individuals involved in the workforce development system.



The MOU will detail shared performance metrics and evaluation criteria to assess the impact and success of collaborative efforts. Responsibilities related to monitoring and evaluating the effectiveness of co-enrollment strategies, funding initiatives, data-sharing practices, and the provision of supportive services will be clearly defined. This shared accountability framework promotes continuous improvement within the workforce development system.

In case of disputes or disagreements related to collaborative funding, co-enrollment, data sharing, or the provision of supportive services, the MOU will outline mechanisms for resolution. Defined processes for communication, mediation, and resolution will be established, allowing entities to address challenges collaboratively and maintain the integrity of the workforce development system.

By memorializing these responsibilities within an MOU, the CNMI's workforce development system creates a structured framework that enhances collaboration, transparency, and accountability. This foundational document serves as a guiding reference, fostering a unified and efficient approach to addressing the multifaceted challenges of workforce development through collaborative funding, co-enrollment strategies, data sharing, and the provision of supportive services.

*Alignment with Activities outside the Plan - Describe how the activities identified above 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.*

Ensuring seamless coordination and avoiding duplication of efforts is a cornerstone of our commitment to effective workforce development. We recognize the importance of aligning our activities with other key partners to amplify the impact of our initiatives. Through strategic collaboration with educational institutions, industry associations, government agencies, and community organizations, we aim to create a cohesive ecosystem that addresses the diverse needs of employers and job seekers.

Our coordination efforts involve regular communication with partner organizations to share insights, discuss ongoing programs, and identify potential areas for collaboration. By fostering an open dialogue, we enhance our collective understanding of the local workforce landscape and streamline efforts to avoid redundancy.

To further strengthen coordination, we actively participate in collaborative planning sessions, joint initiatives, and task forces where multiple stakeholders contribute their expertise. This ensures that each partner plays a complementary role, leveraging their unique strengths to achieve shared goals.

Additionally, we prioritize the establishment of clear roles and responsibilities, delineating areas of expertise for each partner to prevent duplication of services. This strategic alignment allows us to maximize resources, minimize overlap, and collectively address the multifaceted challenges faced by our community.

By consistently evaluating the effectiveness of our collaborations, seeking feedback from partners, and adapting our strategies based on changing needs, we maintain a dynamic and responsive approach to workforce development. Our commitment to coordination and avoidance of duplication underscores our dedication to fostering a unified and impactful workforce development system for the benefit of all stakeholders involved.

***Coordination, Alignment, and Provision 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, and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.*

The collaboration among the core programs is fundamental in delivering comprehensive, high-quality, and customer-centered services to individuals facing barriers to employment. Our integrated approach ensures a seamless system that addresses the unique needs of this population, fostering their successful integration into the workforce.

This collaborative effort involves cross-program coordination to leverage the strengths of each program. Shared case management is employed to provide individuals with a continuum of services tailored to their specific needs. Identifying and addressing barriers to employment is a proactive focus, with coordinated efforts to overcome challenges such as transportation issues, childcare needs, language barriers, and disabilities.

Supportive services play a crucial role in removing obstacles to employment. Coordination across WIOA core programs ensures that individuals receive comprehensive and wraparound support, including transportation assistance, childcare support, and counseling.

Customized training programs and skill development initiatives are designed collaboratively to align with the unique needs of individuals facing barriers to employment. Coordination extends to the referral system and partnerships with external service providers, creating a network that connects individuals to a broader array of resources.

Continuous monitoring and improvement mechanisms are in place, enabling regular assessments, feedback loops, and data analysis to evaluate the effectiveness of coordinated services. This process ensures responsiveness to the evolving needs of individuals with barriers and allows for adjustments to improve overall service quality.

Cultural competence and sensitivity are prioritized in coordination efforts, recognizing the diversity of individuals with barriers. The inclusive approach ensures that services are delivered in a manner that is responsive and culturally appropriate, fostering an environment where individuals can overcome barriers and achieve meaningful success in the workforce.

***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.

The CNMI's WIOA core programs emphasizes a customer-focused, employer-driven approach, where the workforce system actively engages with employers to understand their requirements and collaboratively develops solutions that in turn creates a workforce that is skilled, adaptable, and responsive to the demands of the economy, ultimately enhancing overall prosperity of those that call the CNMI home. The provision of services to employers encompasses a range of activities, including job posting and recruitment support, training programs, apprenticeships and workforce development initiatives. These services are designed to meet the immediate and long-term workforce needs of employers, fostering economic growth and competitiveness.

Through interagency collaboration, the activities and resources to provide high-quality services that meets the needs of employers include and is not limited to the following:

- **Business Needs Assessment:** Conduct periodic assessment of current and projected workforce needs in collaboration with employers to understand industry-specific requirements, skills gaps, and anticipated changes in demand.
- **Industry Sector Partnerships:** Foster strong partnerships with industry associations, chambers of commerce, and employer groups to stay informed about industry trends and emerging needs.
- **Work-Based Learning Models:** Promote and develop work-based learning strategies (Work Experience and Internships, Pre-Apprenticeships, Registered Apprenticeships, On-the-Job Training, Customized Training, Incumbent Worker Training, Transitional Jobs, etc.) that tailors to the specific needs of the employers.
- **Incentive Programs:** Collaborate with the boards to explore and promote incentive programs for employers, such as tax credits, grants, or subsidies for hiring and training initiatives.
- **Marketing and Outreach:** Effective and strategic marketing designs showcasing successes and benefits of current and past employer sponsors of the core programs.

***Partner Engagement with Education Institutions*** - Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the

*State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.*

The CNMI's strategies for workforce development emphasize a collaborative and inclusive approach, actively engaging a diverse array of educational institutions and training providers to create a job-driven education and training system. This commitment is aligned with the provisions outlined in WIOA section 102(b)(2)(B)(iv), which underscores the importance of building partnerships to enhance the effectiveness of workforce development efforts.

#### Collaborative Partnerships:

The cornerstone of our approach is the establishment of strong partnerships with community colleges, adult education providers, area career and technical education schools, and training providers listed in the State's eligible training provider list. Through these collaborations, we aim to leverage the unique strengths and expertise of each institution, creating a comprehensive ecosystem that addresses the diverse needs of our workforce.

#### Strategic Integration of Education and Training Providers:

To foster a job-driven education and training system, the State's strategies focus on the seamless integration of education and training providers into the broader workforce development framework. This involves aligning curriculum offerings with the demands of local industries, ensuring that individuals receive relevant and marketable skills that meet the current and future needs of employers.

#### Customized Programming:

Recognizing the varied learning pathways individuals may take, our strategies emphasize the development of customized programs that cater to a spectrum of learners. This includes initiatives that span community college courses, adult education programs, career and technical education offerings, and eligible training provider options. The goal is to create a flexible and responsive system that accommodates the diverse educational needs of our workforce.

#### Leveraging Federal, State, and Local Investments:

A key aspect of our strategies involves leveraging other Federal, State, and local investments to enhance access to workforce development programs at educational institutions. This includes exploring and maximizing opportunities for grant funding, collaborating with relevant agencies, and strategically aligning resources to amplify the impact of workforce development initiatives. By tapping into additional funding streams, we aim to enhance the scale and reach of programs offered by our educational partners.

#### Alignment with Industry Needs:

The State's strategies are explicitly designed to align with the evolving needs of industries within our region. Regular communication channels are established with employers and industry representatives to identify skill gaps, emerging trends, and areas of workforce demand. This industry-informed approach ensures that education and training programs are responsive to the real-time needs of the job market.

#### Continuous Feedback Mechanisms:

To maintain a dynamic and responsive system, our strategies incorporate continuous feedback mechanisms. Regular consultations with educational partners, employers, and stakeholders enable us to assess the effectiveness of programs and make necessary adjustments. This iterative feedback loop ensures that our education and training system remains agile and adaptable to the evolving landscape of the workforce.

In conclusion, the CNMI's strategies for workforce development prioritize collaborative partnerships with educational institutions and training providers, aiming to create a job-driven education and training system. By strategically integrating diverse learning pathways, leveraging various funding sources, aligning with industry needs, and maintaining regular feedback mechanisms, we seek to establish an interconnected and responsive ecosystem that empowers individuals with the skills needed for success in the workforce.

***Improving Access to Postsecondary Education - 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 CNMI's strategies to enhance access to recognized postsecondary credentials, inclusive of Registered Apprenticeship certificates, reflect a comprehensive approach focused on providing individuals with meaningful pathways to sustainable employment. Through collaboration with educational institutions, employers, and industry representatives, the CNMI's core programs are focused on aligning training initiatives with the evolving needs of the job market. Emphasis is placed on development and expansion of apprenticeship programs, providing individuals with hands-on experience and a pathway to industry-recognized credentials. The system is committed to designing career pathways that seamlessly integrate education and training, offering individuals clear routes to postsecondary credentials that are not only portable across various industries but also stackable, allowing for continuous acquisition of skills. By leveraging partnerships and embracing innovative approaches, the CNMI core programs aim to empower individuals with diverse, recognizable credentials that enhance their employability and contribute to their long-term career success.

These strategies collectively contribute to a dynamic and inclusive approach, enhancing access to activities that lead to recognized postsecondary credentials. By prioritizing industry alignment, apprenticeship expansion, stackable and portable credentials, the CNMI's public workforce system aims to empower individuals with the skills necessary for success in the changing landscape of the workforce.

***Coordinating with Economic Development Strategies - Describe how the activities identified above will be coordinated with economic development entities, strategies, and activities in the State.***

The coordination between the activities workforce development system and economic development entities, strategies, and activities in the CNMI is integral to fostering a synergistic and impactful approach to overall development. The activities encompass various facets of workforce development, and aligning them with economic development initiatives ensures a holistic and mutually reinforcing strategy.

A paramount aspect of our approach is ensuring that the workforce development activities are strategically aligned with the goals and priorities of economic development entities. This alignment involves a comprehensive analysis of economic trends, industry needs, and growth sectors to tailor workforce development activities that directly contribute to the state's economic advancement.

Effective coordination hinges on open lines of communication and collaboration between workforce development stakeholders and economic development entities. Regular meetings, joint planning sessions, and information-sharing forums are established to facilitate ongoing dialogue. This collaborative environment allows for the exchange of insights, data, and feedback, enabling both sectors to make informed decisions that align with broader economic objectives.

Coordination extends to sharing relevant data and conducting joint analyses to identify opportunities and challenges. By integrating economic data with workforce trends, we gain a comprehensive understanding of the labor market demands. This data-driven approach ensures that the workforce development activities are responsive to the evolving needs of industries and contribute directly to economic growth.

To enhance coordination, cross-sectoral partnerships are forged between workforce development entities and economic development organizations. These partnerships may involve collaborative initiatives, joint funding opportunities, and shared resources. By pooling expertise and resources, we maximize the impact of activities, creating a more robust and sustainable framework for overall development.

Workforce development activities are tailored to meet the specific needs of industries identified through economic development strategies. This involves designing training programs and initiatives that directly address skill gaps in sectors critical to the state's economic growth. The goal is to ensure that the workforce is equipped with the skills required to support and drive economic development.

In conclusion, the coordination between the activities of the workforce development system and economic development entities in the CNMI is a strategic imperative. By aligning goals, sharing data, fostering collaboration, and customizing initiatives, we create a cohesive and integrated framework that not only supports workforce development but also contributes significantly to the economic prosperity of the State. This coordinated approach ensures that the activities undertaken yield maximum benefit, positively impacting both the workforce and the broader economic landscape.

**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—*

**Operating Systems that Support Coordinated Implementation of State Strategies** - *State operating systems that support coordinated implementation of State strategies (for example labor market information systems, data systems, communication systems, case management systems, job banks, etc.).*

The CNMI's workforce system currently operates with separate data systems, each serving distinct functions within the broader framework of workforce development. These systems, each designed for specific functions such as participant records, training programs, labor market information, and employment services, contribute to a targeted and efficient approach. The collaborative nature of our efforts is underscored by Memoranda of Understanding (MOUs), serving as foundational agreements that guide coordinated initiatives among stakeholders.

While these systems operate independently, a focus on data sharing enhances their effectiveness. MOU agreements establish clear protocols for information exchange, ensuring a comprehensive understanding of participant progress, labor market dynamics, and program outcomes. Resource limitations have led to challenges in establishing a comprehensive longitudinal system, prompting a pragmatic reliance on separate systems.

Our approach prioritizes flexibility and adaptability to respond to evolving workforce needs. By strategically allocating resources to optimize specific functions, we tailor our efforts to participants, employers, and stakeholders. Despite resource constraints, this targeted approach allows us to navigate challenges and work towards the overarching goals outlined in our State Plan. Through continuous collaboration, data sharing, and adaptive strategies, our separate systems collectively contribute to a cohesive and efficient workforce development ecosystem.

**State Policies that Support Implementation of State's Strategies** - *The State policies that will support the implementation of the State's strategies (for example., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system and any additional guidance for one-stop partner contributions.*

The core programs are actively leading initiatives to develop and strengthen state policies that align with and support the implementation of our strategic vision. These efforts seek to

establish a unified policy framework, promoting effective collaboration and the smooth execution of our state's strategies. Central to these initiatives is the development of co-enrollment policies and, where appropriate, the implementation of universal intake processes. In addition, the core programs are actively involving Memoranda of Understanding (MOUs) in these initiatives to enhance collaboration and coordination, ensuring that policies are developed and implemented in a manner that reflects the comprehensive needs of our workforce development initiatives.

## **State Program and State Board Overview**

***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.

The core programs in the CNMI operate collaboratively within a unified framework. Despite the absence of a traditional one-stop system, these programs work together to address workforce development needs and enhance employability in the region.

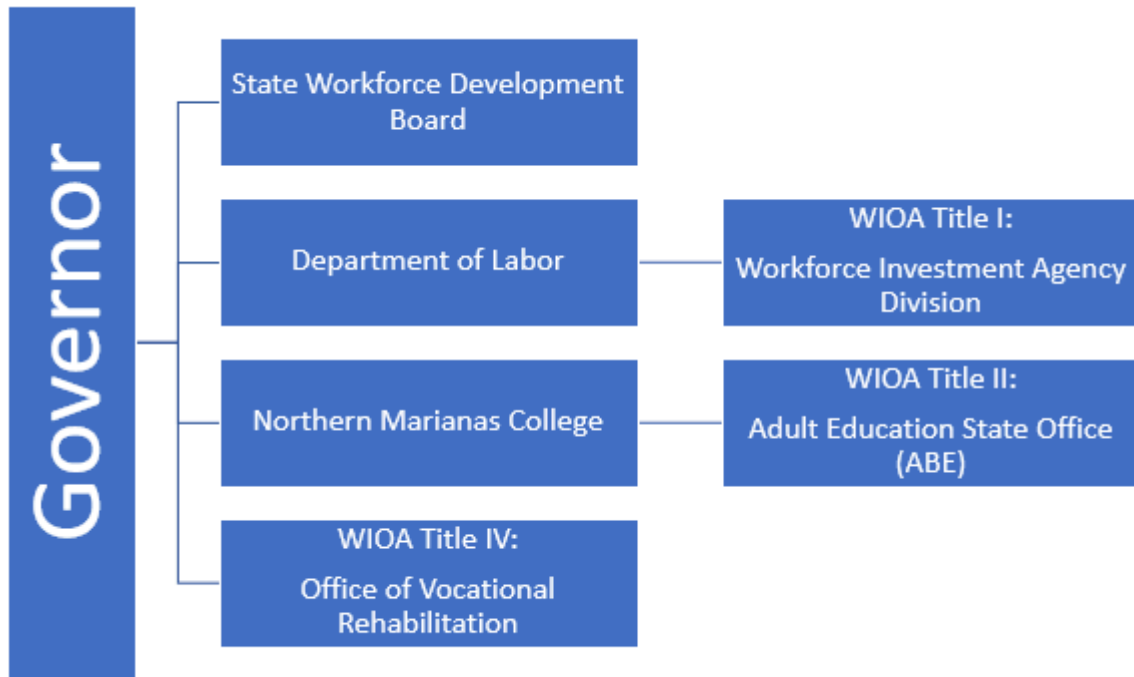
The organization and delivery systems are designed to align with the goals outlined in the Unified State Plan, focusing on specialized areas such as employment services, vocational rehabilitation, and adult education. Stakeholder engagement is a crucial aspect of this collaborative approach, ensuring that workforce development initiatives are responsive to the unique needs and priorities of the local community.

Data integration and reporting mechanisms facilitate the sharing of information among core programs, providing insights into program performance and areas for improvement. Continuous improvement mechanisms, including regular assessments and data analysis, are employed to adapt strategies to changing workforce dynamics.

Despite the lack of a traditional one-stop system, collaborative access points exist, and cross-referral mechanisms are in place to connect individuals with the appropriate programs. The absence of a centralized one-stop system does not hinder integrated service delivery, as core programs collectively provide holistic support to address the multifaceted needs of individuals seeking employment and skills development.



## CNMI Workforce Development System



# CNMI State Workforce Development Board

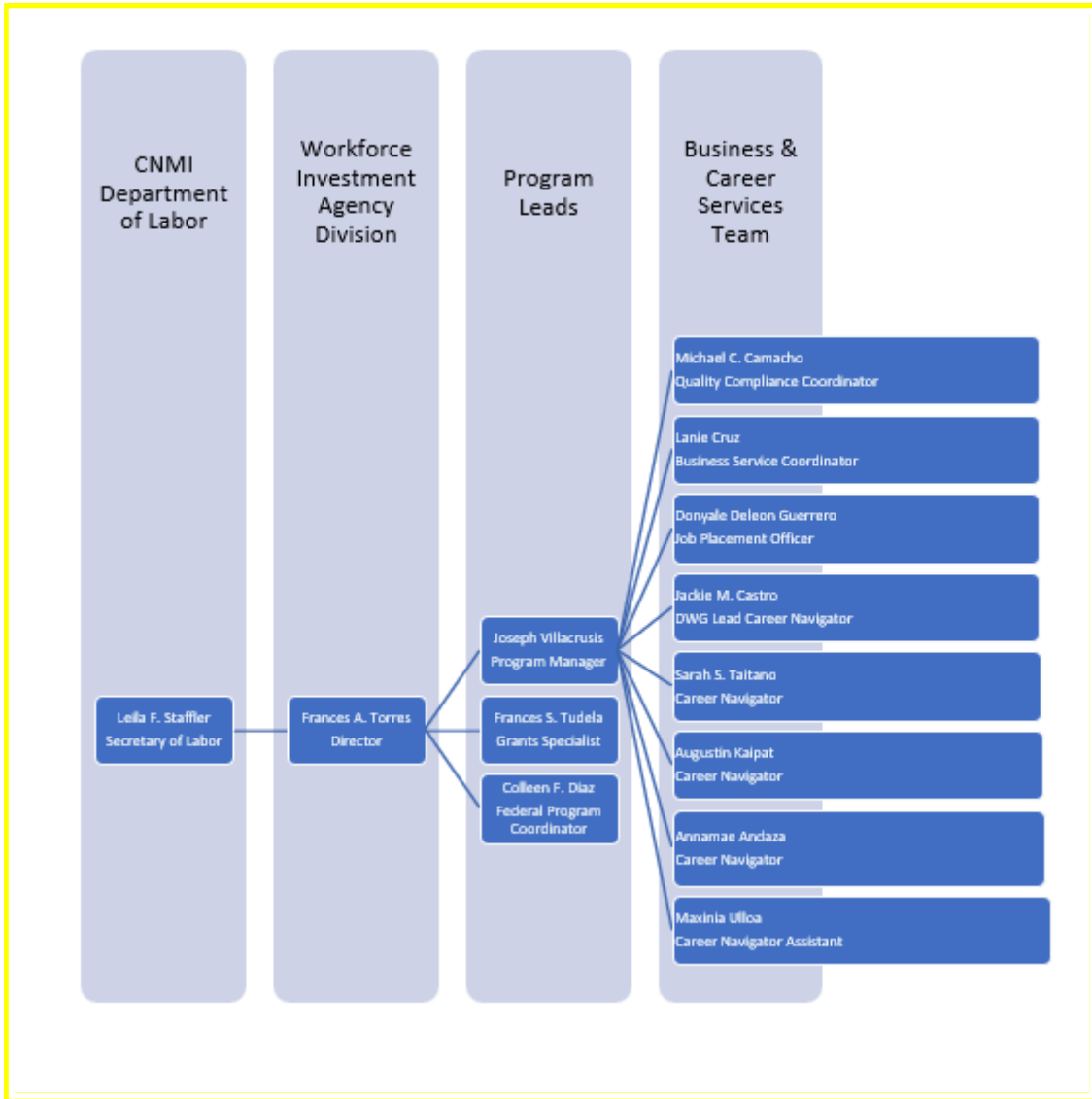
Governor Arnold I. Palacios

State Workforce Development Board

Velma Ann Palacios  
Chairperson

Executive Committee	Planning, Evaluation, Assessment, & Research Committee	Policy Committee	Program Committee
Velma Palacios, Chair Nicole Babauta, Vice Chair Jackie Manglona, Secretary/Treasurer	Dr. Vicente S. Aldan, Chair	Denise Montenegro, Chair	Dina Tenorio, Chair
	Members: Rep. Julie M. Ogo; Lorraine C. Maui, Frances Torres, and Stan Benavente	Members: Nicole Babauta, Leila Staffler, and James Rayphand	Members: Senate President Edith Deleon Guerrero, Jackie Manglona, and Frances Torres,

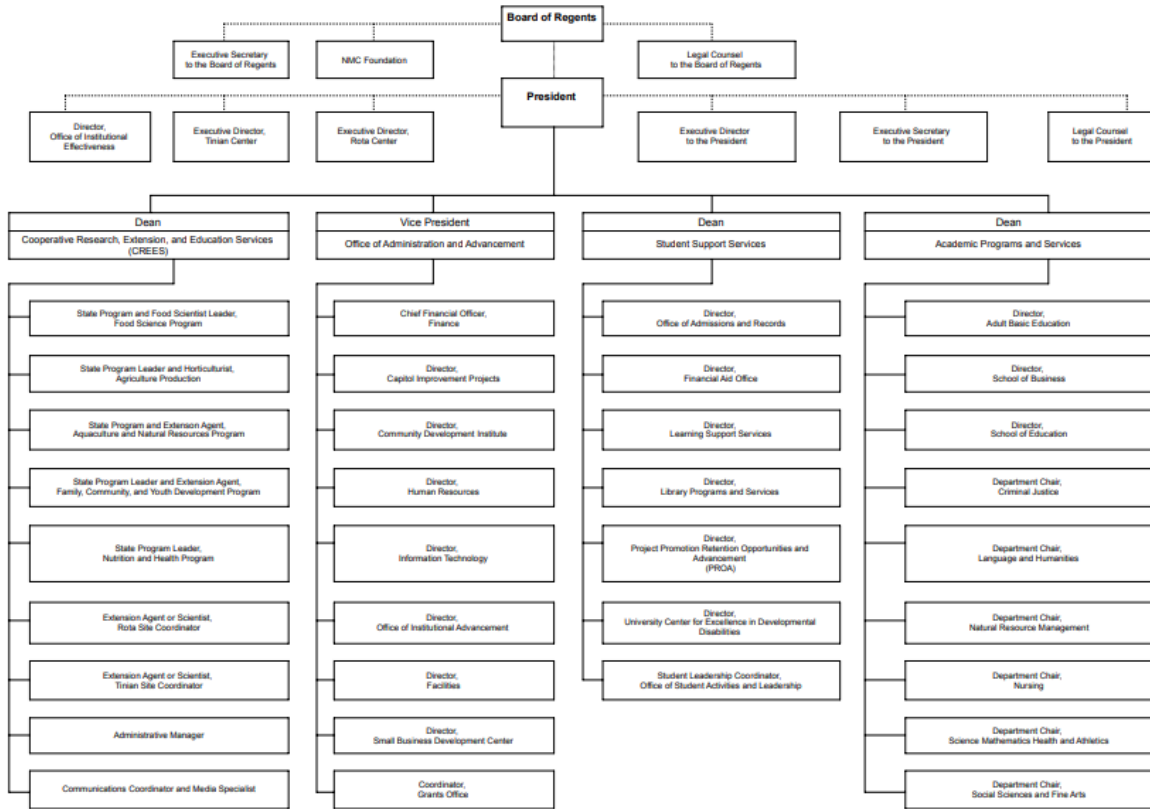
# Title I - DOL Workforce Investment Agency



# Title II - NMC Adult State Basic Education



## Northern Marianas College Organizational Chart



Adopted by: Charles V. Cepeda, Chairman  
NMC Board of Regents

Date: September 22, 2022

Attested by: Galvin Deleon Guerrero, EdD  
NMC President

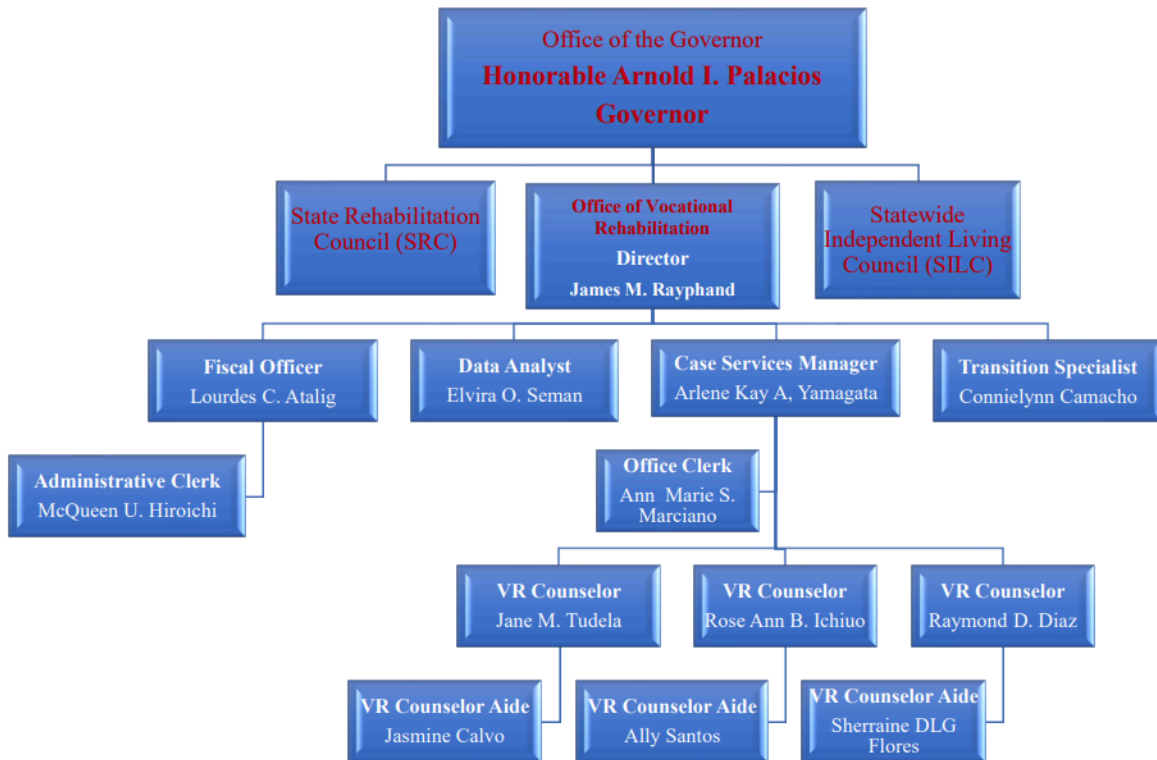
## **Title IV - Office of Vocational Rehabilitation**

The Office of Vocational Rehabilitation is located within the Office of the Governor for administrative purposes. In accordance with the conditions and requirements of 34 CFR Sec. 361.13, OVR shall be the Designated State Entity, and for CNMI the Office of the Governor is established as the Designated State Agency.

The Office of Vocational Rehabilitation (OVR) was established to provide VR services for eligible individuals with disabilities, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that they may prepare for and engage in competitive integrated employment or supported employment and achieve economic self-sufficiency. To be eligible for the VR program, individuals must have a physical or mental impairment that results in a substantial impediment to employment, require and can benefit from VR services to achieve employment and maximize career goals. In addition to serving individuals determined eligible for the VR program, OVR must also provide pre-employment transition services to students with disabilities who are potentially eligible for the VR program.

As mandated by Section 105(a)(1) of the Rehabilitation Act Amendments of 1998, a State Rehabilitation Council (SRC) has been established to review, evaluate, and advise the OVR regarding its performance and effectiveness in delivering services, including the effect of service provision on the achievement of employment outcomes by individuals with disabilities. The SRC also seeks input from community advocates, business and industry representatives, disability groups and other stakeholders to inform the development and implementation of policies and procedures that directly affect the individuals served by the VR agency.

**Organizational Chart**  
[As of January 2024]



**State Board** - Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members’ organizational affiliations and position titles.

The State Workforce Development Board (SWDB) operates under the authority of the Workforce Innovation & Opportunity Act (WIOA). We serve a critical role in supporting the workforce development initiatives in the Commonwealth of the Northern Mariana Islands (CNMI), in close collaboration with Governor Arnold I. Palacios and Lt. Governor David M. Apatang. The SWDB is entrusted with the oversight and coordination of a wide range of workforce development activities, programs, and services. Our core responsibilities include strategic planning, monitoring the Career Center operated by the Workforce Investment Agency Division of the Department of Labor, policy development, system alignment, and performance reporting for the WIOA Title I Adult, Dislocated Worker, and Youth programs.

Composed of dedicated volunteer professionals, the board reflects a balanced composition, with majority from the business sector. The remaining members represent diverse sectors, including Workforce, Government, and the Core Programs.

<b>Business</b>		
Member	Position Titles	Other Affiliations
Velma Ann Palacios Executive Director IT&E	SWDB Chairperson	Saipan Chamber of Commerce Kagman Community Health Center, Inc. State Rehabilitation Council SHRM CNMI Chapter
Nicole Babauta Senior Consumer Sales Manager Docomo Pacific	SWDB Vice Chairperson	Society for Human Resources
Jackie Manglona Operations Manager Kin & Rit	SWDB Secretary/Treasurer	Rota Chamber of Commerce Small Business Development Board US Chamber of Commerce
Dr. Vicente S. Aldan, MD Owner Saipan Health Clinic	SWDB Planning, Assessment, and Evaluation (PAER) Committee Chairperson	
Denise Montenegro HR Manager Hyatt Regency Saipan	SWDB Policy Committee Chairperson	
Dina Tenorio Owner Latte Marine	SWDB Program Committee Chairperson	
<b>Workforce/Labor</b>		
Stan Benevente President Pacific Biomedical Services, Inc.	PAER Committee	RAP Sponsor
<b>State Representatives</b>		
Leila F. Staffler	Policy Committee	

Secretary of Labor CNMI Department of Labor		
Senate President Edith Deleon Guerrero 23rd NMI Senate President	Program Committee	
Representative Julie M. Ogo 23rd House Representatives	PAER Committee	
<b>Core Programs</b>		
Frances A. Torres Director DOL Workforce Investment Agency	PAER & Program Committee	
Lorraine C. Maui State Director NMC Adult Education State Office (ABE)	PAER Committee	CNMI Council on Developmental Disabilities - SWDB Representative
James Rayphand Director Office of Vocational Rehabilitation	Policy Committee	State Rehabilitation Council

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

*Assessment of Core Programs and One-Stop Program Partners -Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. 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.*

Annually, the assessment of our core programs will adhere to the State performance accountability measures outlined in WIOA section 116(b), as well as the specific program requirements. This meticulous evaluation will encompass a thorough examination of key performance indicators that align with the overarching goals of WIOA and the individual objectives of each core program.

The assessment process will employ a systematic approach, utilizing quantitative and qualitative measures to gauge program effectiveness. Quantitative metrics such as participant outcomes, employment rates, and program efficiency will be scrutinized to provide a quantitative overview of each program's impact. Additionally, qualitative aspects, including stakeholder feedback and responsiveness to evolving workforce needs, will be considered to ensure a holistic evaluation.



Specific program requirements will be considered as part of our assessment strategy, recognizing the unique goals and responsibilities outlined for each core program under WIOA. This involves evaluating adherence to programmatic guidelines, compliance with regulations, and the achievement of targeted outcomes that are specific to each program's mission.

***Previous Assessment Results*** - For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described above.

In 2023, the SWDB and the Workforce Investment Agency collaborated with the 2022-2023 University of Guam Master of Public Administration Cohort to undertake a study focused on evaluating the service delivery system, with a specific emphasis on Business Services activities. Despite not achieving the anticipated number of respondents, the study's findings underscored the importance of refining outreach and marketing strategies, as well as ensuring more timely service delivery. The results have prompted a commitment to continuous improvement efforts in these areas.

***Evaluation*** - Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

The CNMI's approach to conducting evaluations and research projects of activities under WIOA core programs is grounded in a collaborative and comprehensive strategy. To ensure the efficacy and relevance of these projects, coordination will be prioritized, fostering collaboration with the board, as well as with State agencies overseeing the administration of the respective core programs.

The design of these projects will prioritize a mix of quantitative and qualitative methodologies, aligning with best practices in research and evaluation. Data-driven insights will be derived not only from numerical metrics but also from stakeholder input, participant feedback, and the experiences of individuals engaged in WIOA core programs.

Regular communication channels, joint planning sessions, and inclusive decision-making processes will characterize the coordination efforts. This collaborative approach aims to enhance the validity and reliability of evaluations and research projects, ensuring they effectively inform strategic decision-making, program improvement, and the overall success of our workforce development initiatives.

**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.*

**For Title I** - *provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—*

As a singular state without designated local areas, our distribution of funds under the core programs is designed to be comprehensive and strategic, aligning with the provisions authorizing such allocations. For Title I programs, our written policies outline the methods and factors employed in distributing funds to address specific aspects of workforce development:

(i) Youth Activities (WIOA section 128(b)(2) or (b)(3)):

Our approach to distributing funds for youth activities aligns with WIOA provisions to address the diverse needs of both out-of-school and in-school youth. At a minimum, 75 percent of the allocated funds are dedicated to out-of-school youth activities, emphasizing crucial elements such as secondary school diploma attainment, entry into postsecondary education, and career readiness. The remaining 25 percent is directed towards in-school youth, ensuring a balanced focus on supporting educational and career advancement for all youth participants.

(ii) Adult and Training Activities (WIOA section 133(b)(2) or (b)(3)):

In the distribution of funds for adult and training activities, our priority is to fund comprehensive career services that align with WIOA provisions. This includes a spectrum of services such as basic career services, individualized career services, and follow-up services. Training activities encompass a range of options, from occupational skills training and on-the-job training to incumbent worker training, skills upgrading, retraining, entrepreneurial training, transitional jobs, and more. The allocation emphasizes prioritized access for adults who meet specific criteria, ensuring that individualized career services and training are directed towards those who need them most.

(iii) Dislocated Worker Employment and Training Activities (WIOA section 133(b)(2)):

For dislocated worker employment and training activities, allocated funds are used for the provisions of WIOA career services, as specified in section (ii). The provisions of priority of services does not apply to the dislocated worker employment and training activities.

For dislocated worker employment and training activities, funds are utilized in alignment with the provisions specified for adult and training activities (section ii). This ensures consistency in the delivery of career services and training activities for dislocated workers. Notably, the priority of services, which applies to other adult services, is not enforced for dislocated worker employment and training activities. This distinction allows for flexible and tailored support to meet the unique needs of individuals facing workforce disruptions.

*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***

The Adult Education Office under Subtitle C – Local Provision, Sec. 231 will make funds available for eligible agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e). The funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region.

Eligible program providers may include some or all of the following:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Workforce preparation activities; or
- Integrated education and training that-
  - 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
  - Is for the purpose of educational and career advancement.

The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two-year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

All applications received will be pre-screened to determine eligibility before scoring. Applications will be reviewed internally to determine that all required documents are included, as well as, documentation required to show “demonstrated effectiveness.” Applications that are incomplete, or determined to be from a provider that is not an eligible provider of “demonstrated effectiveness” will not be reviewed or scored by the review panel.

Sec.§ 463.24 (a) For the purposes of this section, an eligible provider must demonstrate past effectiveness by providing performance data on its record of improving the skills of eligible

individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the State's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training; and (b) There are two ways in which an eligible provider may meet the requirements in paragraph (a) of this section:

- (1) An eligible provider that has been funded under the Adult Education and Family Literacy Act must provide performance data to demonstrate past effectiveness.
- (2) An eligible provider that has not been previously funded under the Adult Education and Family Literacy Act must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes listed in paragraph (a) of this section.

***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 AEFLA funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region. The Adult Education Office under Subtitle C – Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231(e).

The Adult Education Office shall award two-year grants or contracts to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) use the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

All eligible providers have direct and equitable access to apply and compete for grants or contracts;

The same grant or contract announcement and application processes are used for all eligible providers in the State or outlying area; and

In awarding grants or contracts to eligible providers for adult education and literacy activities, funds shall not be used for the purpose of supporting or providing programs, services, or activities for individuals who are not eligible individuals as defined in the Act, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. Prior to providing family literacy activities for individuals who are not eligible individuals, an eligible provider shall attempt to coordinate with programs and services that do not receive funding under this title.

## ***Vocational Rehabilitation Program***

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.

Not Applicable

## **Program Data**

***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. Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

- (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.
- (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.
- (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.
- (iv) Describe the State's data systems and procedures to produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).

The CNMI's workforce development system recognizes the critical importance of data alignment and integration to enhance the efficiency and effectiveness of our programs. Although we currently utilize separate systems, the lead State agencies, in collaboration with the State Board, have developed comprehensive plans to align and integrate workforce and education data systems for the core programs, where feasible. Here's an overview of our approach:

Our overarching goal is to establish a unified data environment that spans core programs, and other State Plan partner programs. Progress to date includes the initiation of cross-agency collaboration, the development of data-sharing protocols, and the exploration of technological solutions to enable seamless integration. Our ongoing commitment is to achieve a fully integrated system that facilitates comprehensive data analysis and reporting.

Our data-collection and reporting processes are designed to capture essential information for all programs and activities. We are implementing standardized procedures to collect and report data on co-enrollment, ensuring that individuals accessing multiple programs are accurately represented. This process is crucial for obtaining a holistic view of participant engagement and outcomes.

To maximize the efficient exchange of common data elements, we have devised plans to make the management information systems for core programs interoperable. This involves leveraging technology to create seamless connections between systems, allowing for real-time data sharing and reducing administrative burdens. The aim is to support assessment and evaluation efforts across the workforce development system.

Our plans include the integration of data systems to facilitate streamlined intake and service delivery processes. We are exploring technologies and strategies to enable individuals to access multiple programs seamlessly, minimizing duplication of efforts and enhancing the overall participant experience. The integration efforts aim to provide a unified entry point for individuals seeking workforce services.

The State Board plays a vital role in assisting the governor in aligning technology and data systems across required one-stop partner programs. This involves actively participating in the design and implementation of common intake processes, data collection mechanisms, and other technology-related initiatives. The alignment efforts seek to improve service delivery, particularly for unemployed individuals, by creating a more cohesive and efficient system.

Our state has implemented data systems and procedures to produce the reports required under section 116 of the Workforce Innovation and Opportunity Act (WIOA). This includes establishing a standardized reporting framework, conducting regular data quality assessments, and ensuring compliance with reporting requirements. The procedures are designed to generate accurate and timely reports for the performance accountability system.

In summary, while our workforce development system currently relies on separate systems, our comprehensive plans for data alignment and integration reflect a commitment to improving service delivery, enhancing participant outcomes, and meeting reporting obligations under WIOA. Ongoing collaboration, technology investments, and strategic initiatives underscore our dedication to achieving a seamlessly integrated data environment that supports the holistic goals of workforce development in our state.

*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.*

The lead agencies are dedicated to maintaining ongoing engagement with former participants by conducting quarterly follow-ups. This initiative reflects our commitment to tracking the progress of individuals who have exited from core programs and ensuring their continued success in postsecondary education or employment.

Our quarterly follow-up process involves reaching out to former participants to gather valuable insights into their experiences post-exit. This proactive approach allows us to assess various aspects of their journey, including their engagement in postsecondary education, persistence in educational programs, attainment of postsecondary credentials, and their entry or retention in employment.

By performing these regular check-ins, we aim to establish consistent feedback and maintain an open line of communication with former participants. This enables us to identify any challenges or barriers they may be facing and provides an opportunity to offer additional support or resources as needed. Moreover, the follow-up process allows us to celebrate their achievements and successes, contributing to a positive and encouraging relationship between the workforce development system and the individuals it serves.

The information gathered during these quarterly follow-ups is integral to our data collection and reporting processes. It contributes to a more comprehensive understanding of participant outcomes, informs continuous improvement strategies, and supports the overall assessment of the effectiveness of our core programs.

Our commitment to performing quarterly follow-ups underscores our dedication to the long-term success of participants beyond their initial engagement with the workforce development system. By staying connected and responsive to their evolving needs, we strive to create a supportive environment that maximizes the positive impact of our programs on individuals' post-exit educational and employment journeys.

***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.)

In the CNMI, where we do not administer a Unemployment Insurance (UI) program, we have implemented alternative strategies to fulfill the requirements for utilizing wage data in accordance with Federal and State laws. Despite the absence of a UI program, we remain committed to data practices to support performance accountability, program evaluations, and the generation of workforce and labor market information.

***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 privacy safeguards in our state's workforce development system are meticulously designed to uphold confidentiality, security, and ethical handling of participant information.

Aligned with section 444 of the General Education Provisions Act (20 U.S.C. 1232g), commonly known as FERPA, and other relevant Federal laws, our privacy protocols ensure the protection of personally identifiable information (PII).

Our commitment to privacy includes obtaining informed consent from participants before collecting any information. We prioritize transparent communication, detailing the purpose of data collection, the types of information gathered, and how the data will be used.

The system employs advanced data encryption and security measures to prevent unauthorized access or disclosure. This includes secure storage, access controls, and encryption technologies to safeguard data both in transit and at rest.

Access to participant information is restricted to authorized personnel based on the need-to-know principle. Regular training and awareness programs ensure that staff members are well-informed about privacy policies, procedures, and the importance of maintaining confidentiality.

Auditing and monitoring activities are conducted regularly to detect and prevent unauthorized access or breaches of participant information. This proactive approach allows for swift response to potential security incidents and continuous improvement of privacy safeguards.

Our privacy safeguards also adhere to other applicable Federal laws, ensuring comprehensive compliance with regulations such as the Workforce Innovation and Opportunity Act (WIOA) and the Health Insurance Portability and Accountability Act (HIPAA) when relevant.

In summary, our state's workforce development system prioritizes privacy safeguards to ensure the responsible handling of participant information, foster stakeholder trust, and comply with Federal laws governing data privacy and security.

### **Priority of Service for Veterans**

*Priority of Service - Describe how the State will implement the priority of service provisions for covered persons 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.*

The CNMI is committed to implementing the priority of service provisions for covered persons in strict accordance with the requirements of the Jobs for Veterans Act, as codified at section 4215 of 38 U.S.C. This commitment extends to all employment and training programs funded either wholly or partially by the Department of Labor.

Our approach to implementing priority of service provisions is rooted in the recognition of the unique contributions and sacrifices made by covered persons, particularly veterans. To ensure compliance with the Jobs for Veterans Act, our state has developed a comprehensive strategy that encompasses the following key elements:



We actively engage in outreach initiatives to raise awareness among covered persons about the priority of service provisions. Through targeted communication channels, including veterans' organizations, military transition assistance programs, and community networks, we aim to ensure that eligible individuals are informed about their entitlement to priority services.

Covered persons are afforded streamlined access to employment and training services through designated channels. This involves establishing clear procedures and entry points within our workforce development system, ensuring that eligible individuals receive expedited and prioritized assistance in accessing relevant programs and resources.

Our priority of service implementation strictly adheres to all federal regulations outlined in the Jobs for Veterans Act. This includes ongoing efforts to stay abreast of any updates or amendments to relevant legislation, ensuring our practices remain current and compliant.

***Monitoring of POS for Veterans - Describe how the State will monitor priority of service provisions for veterans.***

The CNMI engages in continuous monitoring and evaluation processes to assess the effectiveness of priority of service implementation. Regular reviews of program outcomes and participant feedback allow us to make data-driven adjustments and enhancements to ensure the provisions are consistently and equitably applied.

***Triage and Referral for JVSG and DVOP - Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.***

The CNMI does not directly administer Jobs for Veterans State Grants (JVSG) and the Disabled Veterans' Outreach Program (DVOP) grants. We have established a triage and referral process to ensure eligible veterans and other populations receive the necessary services. Referrals are made to the appropriate entities within the insular area to maximize the impact of these specialized programs.

***Accessibility of the One-Stop Delivery System for Individuals with Disabilities - Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding 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.***

The CNMI's workforce development system is committed to ensuring the physical and programmatic accessibility of facilities, programs, services, technology, and materials for

individuals with disabilities in accordance with Section 188 of the Workforce Innovation and Opportunity Act (WIOA) and the Americans with Disabilities Act of 1990 (ADA).

We have implemented measures to ensure that our respective facilities are physically accessible to individuals with disabilities. This includes ramp access, wheelchair accessibility, and other accommodations to facilitate ease of entry and movement within the centers.

Our programs and services are designed to be inclusive and accessible to individuals with varying abilities. Programmatic accessibility considerations include providing alternative formats for materials, ensuring effective communication, and offering reasonable accommodations during service delivery.

The technology used in our centers are selected and configured to be accessible to individuals with disabilities. This includes the use of assistive technologies, compatibility with screen readers, and adherence to industry standards for accessibility in digital content.

As partners of the CNMI's Disability Network Partners (DNP), our staff undergo comprehensive training to enhance their understanding of the needs of individuals with disabilities. This training includes awareness of ADA requirements, effective communication strategies, and guidance on providing reasonable accommodations. Ongoing support and resources are provided to staff to ensure continuous improvement and responsiveness to the evolving needs of diverse populations.

**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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.*

Ensuring accessibility for English language learners within the CNMI's workforce development system is a priority. The core programs will implement comprehensive measures to address the unique needs of English language learners. This includes the establishment of clear procedures, ongoing staff training initiatives, provision of relevant resources, and the development of materials tailored to the linguistic and cultural backgrounds of English language learners.

## 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.*

In the Commonwealth of the Northern Mariana Islands (CNMI), the Workforce Innovation and Opportunity Act (WIOA) core programs, comprising Title I (Workforce Development Activities), Title II (Adult Education and Literacy), and Title IV (Vocational Rehabilitation), recognize the imperative of joint planning and coordination to maximize our collective impact. The narrative below outlines the methods employed to foster seamless collaboration among these essential programs.

- **Interagency Collaboration:**  
Joint planning and coordination begin with interagency collaboration. The entities responsible for implementing WIOA core programs, including the State Workforce Board, DOL Workforce Investment Agency Division, NMC Adult Education State Office (ABE), and Office of Vocational Rehabilitation (OVR), engage in regular collaborative sessions. These sessions serve as platforms for dialogue, information exchange, and alignment of programmatic goals to ensure a unified approach.
- **Unified State Plan:**  
A cornerstone of joint planning is the creation and adherence to a Unified State Plan. This comprehensive document serves as a roadmap, outlining shared goals, strategies, and performance metrics across Title I, II, and IV. The development of the plan involves input from all core program stakeholders, fostering a sense of ownership and commitment to shared outcomes.
- **Quarterly Focused Group Sessions:**  
To maintain a proactive approach, regular coordination meetings are scheduled among representatives from each core program. These sessions provide a structured forum for discussing progress, challenges, and opportunities. Through open communication, program administrators can identify areas for collaboration, address potential bottlenecks, and share best practices.
- **Cross Training and Professional Development**  
Joint planning is reinforced through cross-training initiatives and professional development programs. Staff involved in the implementation of Title I, II, and IV programs engage in joint training sessions to gain a comprehensive understanding of each other's roles and responsibilities. This cross-training fosters a collaborative spirit, promoting a shared understanding of the broader workforce development landscape.
- **Integrated Service Delivery Models:**  
Joint planning extends to the design and implementation of integrated service delivery models. By aligning the service delivery structures of Titles I, II, and IV, individuals seeking assistance experience a seamless and coordinated process. This integration ensures that participants receive comprehensive support, addressing their educational, training, and vocational rehabilitation needs through a unified service model.

- **Data Sharing and Performance Metrics:**

A critical component of joint planning is the establishment of mechanisms for data sharing and performance metrics alignment. By harmonizing data collection and reporting processes, the core programs can collectively assess their impact, identify areas for improvement, and streamline their reporting to federal agencies.

- **Regular Program Assessments:**

Joint planning is an ongoing process that involves regular program assessments. These assessments, conducted collaboratively among the core programs, facilitate a continuous improvement cycle. By collectively evaluating program effectiveness, identifying gaps, and adapting strategies, the programs can enhance their overall impact on workforce development in the CNMI.

In conclusion, the methods employed for joint planning and coordination among WIOA core programs in the CNMI underscore a commitment to synergy, efficiency, and the shared goal of empowering individuals through comprehensive workforce development initiatives. Through regular collaboration, unified planning, and a commitment to collective impact, the core programs aim to create a robust and seamless ecosystem that supports the diverse needs of individuals seeking employment, education, and vocational rehabilitation services.

## V. COMMON ASSURANCES (for all core programs)

<b>The Unified or Combined State Plan must include assurances that:</b>	
1.	The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
2.	The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;
3.	The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;
4.	<p>The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;</p> <p>The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;</p>
5.	The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;
6.	The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);

7.	The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
8.	The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;
9.	The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;
10.	The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);
11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
12.	Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

## **VI. PROGRAM SPECIFIC-REQUIREMENT FOR CORE PROGRAMS**

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

### **Adult, Dislocated Worker, and Youth Activities under Title I-B**

#### **General Requirements**

***Regions and Local Workforce Development Areas** - Identify the regions and the local workforce development areas designated in the State.*

In the CNMI, the process for designating local areas under WIOA is unique, reflecting the States status as a single state workforce development area. Given this singular designation, the criteria for local area requirements are incorporated into the operational manual to ensure compliance with WIOA guidelines. The CNMI's State Workforce Development Board (SWDB) has strategically streamlined its approach, recognizing the inherent cohesion of its workforce development efforts across the entire territory.

While the traditional concept of delineating local areas may not be applicable given the singular statewide designation, the CNMI's SWDB is devoted to actively engaging with representatives from the islands. By ensuring representation from Tinian and Rota on the board, these representatives contribute to in-depth discussions, engage in data analysis, and participate in feedback sessions. This collaborative approach is crafted to thoroughly comprehend and integrate the islands of Tinian and Rota unique economic dynamics, workforce priorities, and community needs. These insights seamlessly feed into the overarching workforce development strategy, fostering an adaptive and responsive approach to address the distinct characteristics of workforce development across the entire CNMI.

#### **Statewide Activities**

***Policy on Use of State Funds** - Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities. Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.*

The CNMI's State Workforce Development Board (SWDB) has implemented policies governing the allocation of Title I formula funds to facilitate statewide activities catering to adults, dislocated workers, and youth. These policies prioritize the utilization of funds for a range of allowable statewide employment and training activities. Regardless of the funding source, the SWDB ensures a comprehensive and strategic approach to address workforce development needs across the Commonwealth.

The allowable statewide employment and training activities encompass a diverse set of initiatives, including:

- **Rapid Response Activities:** Swift and effective responses to workforce disruptions, ensuring timely assistance to affected workers.
- **Dissemination of the ETPL:** Ensuring the widespread dissemination of the Eligible Training Provider List (ETPL) to facilitate informed choices for individuals seeking training opportunities.
- **Outreach and Partnerships with Employers:** Actively engaging with employers through outreach efforts, establishing partnerships to align workforce development with industry needs.
- **Effective Service Delivery Strategies and Promising Practices:** Incorporating proven strategies and innovative practices to enhance the effectiveness of service delivery across programs.
- **Performance Information:** Gathering and utilizing performance data to inform decision-making, evaluate program effectiveness, and drive continuous improvement.
- **Information and Program Accessibility for Individuals with Disabilities:** Ensuring that workforce development information and programs are accessible to individuals with disabilities, promoting inclusivity.
- **Evaluations:** Conducting thorough evaluations to assess the impact and efficiency of statewide activities, guiding evidence-based decision-making.
- **Technical Assistance:** Providing support and technical assistance to enhance the capacity and effectiveness of service providers and partners.
- **Regional Planning:** Engaging in regional planning efforts to align workforce strategies with local economic and labor market conditions.
- **Industry and Sector Partnerships:** Cultivating collaborations with industries and sectors to address workforce needs and foster economic growth.

These activities collectively contribute to the SWDB's commitment to advancing workforce development in the CNMI, ensuring that statewide initiatives are aligned with the unique needs and priorities of the Commonwealth.

***Use of Rapid Response Funds** - 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.*

The SWDB together with the Workforce Investment Agency is dedicated to strategically utilizing Rapid Response funds, ensuring timely and effective responses to layoffs and plant closings. Rapid Response activities will be coordinated efficiently to intervene promptly upon notification of imminent workforce disruptions, providing immediate assistance during critical transition periods.

Directed use of Rapid Response funds will encompass a comprehensive range of support services for affected workers. This includes providing information on available



unemployment benefits, reemployment services, skills assessments, and access to training opportunities for skill enhancement and upskilling.

Effective communication channels will be established with affected employers to understand specific needs and challenges, ensuring collaboration and tailoring Rapid Response services to the unique circumstances of each layoff or plant closing event.

Rapid Response funds will support the development and implementation of customized workforce solutions, including job placement assistance, career counseling, and support for workers exploring new employment opportunities.

In addition to responding to imminent layoffs, the SWDB in collaboration with the administering entity, Workforce Investment Agency, will proactively implement layoff aversion strategies. This involves identifying at-risk companies and workers early on and implementing targeted interventions to prevent or mitigate potential layoffs. Strategies may include workforce training programs, business support services, and partnerships with industry stakeholders.

The CNMI's commitment to layoff aversion aligns with a proactive approach to addressing economic challenges before they escalate. By strategically utilizing Rapid Response funds and implementing layoff aversion strategies, we aim to foster economic resilience, support affected workers, and contribute to the overall stability and growth of our labor market.

***Rapid Response Coordination with FEMA and other Entities - Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.***

In the event of disasters, the designated Rapid Response Coordinator within the Workforce Investment Agency is responsible for coordinating disaster response and recovery activities. This coordination includes collaboration with the Federal Emergency Management Agency (FEMA) to facilitate and provide rapid response activities, as permitted by applicable regulations and guidelines. The Rapid Response Coordinator plays a crucial role in ensuring effective communication, resource mobilization, and timely support for affected workers and employers during the aftermath of disasters.

***Rapid Response Early Intervention for TAA***

The CNMI does not currently receive TAA funds. As such this requirement is inapplicable.

## **Adult, and Dislocated Worker Program Requirements**

***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.***

The CNMI Title I prides itself on the "UpSkill, BackFill strategy" incorporating various work-based training models as part of our comprehensive training strategy mentioned throughout this plan. These models, including on-the-job training, incumbent worker training, transitional jobs, and customized training, play a pivotal role in enhancing the skills and capabilities of our workforce.

***Registered Apprenticeship*** - Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Since being awarded the Apprenticeship State Expansion (ASE) grant, the CNMI DOL Workforce Investment Agency Division has seamlessly integrated Registered Apprenticeships into our service design and delivery. This integration has enriched our existing work-based training models for both participants and employers, demonstrating a commitment to innovate workforce development strategies. This strategic incorporation aims to expand opportunities for sponsors and potential apprentices, connecting them to the benefits of Registered Apprenticeships through targeted outreach efforts. By fostering collaboration with industry stakeholders and educational institutions, we ensure a diverse pool of potential apprentices. Through awareness-building initiatives and support infrastructure development, we strive to demystify the apprenticeship experience, showcasing its long-term benefits and creating a seamless pathway for participants. Overall, our approach underscores a commitment to a dynamic and inclusive workforce development ecosystem.

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

The CNMI's State Workforce Development Board (SWDB) has instituted policies and procedures to govern the determination of eligibility for training providers, including those offering Registered Apprenticeship programs. The process involves a comprehensive evaluation of training programs, ensuring alignment with industry needs and compliance with eligibility conditions. Below is an overview of the key components:

Procedure:

- Training providers submit applications for initial or continued eligibility to the SWDB for review.
- Applications undergo scrutiny by CNMI DOL for compliance before being presented to the SWDB Program Committee.
- The SWDB Program Committee assesses applications and recommends approval or disapproval to the entire SWDB.

- The SWDB's decision is communicated to the applicant and CNMI DOL for execution.

#### Eligibility Requirements:

Training providers must meet conditions 1-7 for eligibility, including being accredited institutions, having a minimum one-year presence in the CNMI, providing documentation of legal standing, assuring non-discrimination, cooperating with monitoring, offering relevant programs, and complying with WIOA performance targets.

#### Exemptions:

Certain programs like On-the-Job Training (OJT), Customized Training, Incumbent Worker Training, Transitional Jobs, and Internships may be exempt or subject to specific policy provisions. Registered Apprenticeship Sponsors, upon approval from the US DOL Office of Apprenticeship, are automatically eligible and exempt from specific eligibility requirements.

#### Determining Initial and Continuing Eligibility:

- Initial eligibility is assessed based on program-to-program criteria, including resource availability, relevance to in-demand sectors, industry-recognized credentials, and linkage to related employment.
- Continued eligibility requires providers to submit performance data reports, information on program modifications, alignment with in-demand sectors, and adherence to minimum performance measures.

#### Failure to Meet Performance Requirements:

- Providers failing to meet performance levels for two or more indicators may be removed from the Eligible Training Provider List (ETPL) for one year.
- Probationary status is considered for those failing in one or more indicators but meeting specific criteria.

#### Out of State/Online Providers:

Providers outside the CNMI with in-state facilities must comply with eligibility requirements. Online providers are evaluated case-by-case.

#### Price Change and Refunds:

Any change in the program's price requires SWDB approval. Refund policies must be in place, and providers failing to refund may face removal from the ETPL.

#### Denial and Removal:

The SWDB may deny initial eligibility for various reasons, including incomplete applications or intentional misinformation. Removal from the ETPL may occur due to non-compliance, loss of accreditation, or failure to meet performance standards.

Appeals:

Applicants have the right to appeal denials or removals. The appeal process involves submitting a written appeal to the SWDB Executive Committee, presenting oral and written testimony, and receiving a final decision within 30 days of the hearing.

*Adult Priority of Service - Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).*

The CNMI is committed to implementing the Adult Priority of Service requirement in accordance with WIOA section 134(c)(3)(E). This prioritization emphasizes providing adult services to recipients of public assistance, low-income individuals, and those who are basic skills deficient. The priority is applicable to both individualized career services and training services, irrespective of funding levels.

In implementing this priority, the CNMI places emphasis on the following key groups:

Recipients of Public Assistance and Low-Income Individuals:

- Individuals falling under these categories are accorded top priority for receiving individualized career services and training services. This applies regardless of whether the program is fully funded or facing budget constraints.

Basic Skills Deficient Individuals:

- A heightened priority is given to individuals who are basic skills deficient, ensuring that their needs are addressed promptly and effectively. This prioritization is not contingent on funding levels and underscores the commitment to improving the skills of those facing literacy and basic skills challenges.

Veterans Priority:

- Veterans and eligible spouses are granted the highest priority for services, aligning with the Jobs for Veterans Act (38 U.S.C. 4215(2)). The priority is structured in a tiered fashion, considering factors such as public assistance receipt, low income, and basic skills deficiency.

#### Order of Priority for Veterans:

- The order of priority for veterans is clearly outlined, with an emphasis on addressing the unique needs of this group. Veterans and eligible spouses who are public assistance recipients, low-income individuals, or basic skills deficient are given precedence.

#### Priority Percentage Requirement:

- To ensure effective implementation, program staff must guarantee that a substantial proportion of participants—specifically 75% and no lower than 50.1%—receiving individualized career and training services in the Adult program belong to at least one of the priority groups mentioned above. This percentage requirement underscores the State's commitment to prioritizing services for those individuals facing economic challenges, basic skills deficiencies, and veterans who have served our nation.

Continuous monitoring and assessment will be in place to ensure that the priority of service remains aligned with the policy's objectives, and individuals in the priority groups receive the necessary support and services.

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

In accordance with the outlined policy, the CNMI has established criterias governing the transfer of funds between the adult and dislocated worker programs. These criteria include:

- **Sufficient Discretionary Funding:** State agency can propose fund transfers based on the availability of discretionary funding. If there is surplus discretionary funding in one program that aligns with state workforce needs, a transfer may be considered.
- **Exhaustion of Program Funds:** The state agency may request a transfer when all funds in one program have been used, leaving unmet needs. In such cases, if there are still adequate funds available in the other program, a transfer can be pursued to optimize resource utilization.
- **Other Criteria:** If the state cannot meet the above criteria, it can submit a transfer request based on unique circumstances. The requestor must provide a comprehensive explanation of the rationale, identifying the specific situation necessitating the need. The request should articulate the benefits resulting from the transfer and align with the approved State Plan. Additionally, it should include assurances that the target group from which funds will be taken will not suffer negative consequences.

## **WIOA and TAA**

WIOA and TAA (VI.(b)(6-8)

As of the present, the Commonwealth of the Northern Marianas Islands (CNMI) does not currently receive Trade Adjustment Assistance (TAA) funds. Furthermore, the CNMI has yet to establish specific policies, processes, or strategies related to TAA implementation.

**Youth Program Requirements** - *With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-*

**Grants or Contracts for Youth Workforce Investment Activities** - *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. Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.*

All service providers must adhere to the guidelines outlined in the Training Provider Eligibility Procedure above of this plan in accordance with the CNMI's ETPL policy.

**Equitable Access for In-School and Out-of-School Youths** - *Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.*

The CNMI's State Workforce Board is dedicated to fostering equitable outcomes for both in-school and out-of-school youth, employing a strategic approach to achieve this goal. They actively promote promising practices and partnership models with a focus on supporting and scaling these models.

In the pursuit of equitable results, the SWDB collaborates closely with the core programs to identify and implement effective strategies. They champion initiatives that address the unique needs of both in-school and out-of-school youth, recognizing the importance of tailored approaches for each group.

Promising practices implemented by the core programs serve as valuable lessons and models for success. The SWDB plays a pivotal role in identifying these successful practices and facilitating their expansion. By supporting and scaling these models, the boards aim to create a consistent and impactful approach to youth workforce development.

In summary, the CNMI State Workforce Boards take a leadership role in fostering equity for both in-school and out-of-school youth. They leverage local success stories, provide support, and actively contribute to the scaling of effective models to create a comprehensive and equitable youth workforce development framework across the entire state.

***Innovative Models*** - Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

The State Workforce Boards actively support and guide core programs in implementing innovative models for youth workforce investment activities. Emphasizing the importance of the 14 program elements outlined in WIOA section 129(c)(2), the State encourages collaboration between core programs, local entities, and stakeholders. Work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized within a comprehensive career pathways strategy, with the State providing guidance on integrating these elements effectively. This approach ensures that youth receive meaningful work-based learning experiences, enhancing their overall career readiness.

***State Policy on “Requiring Additional Assistance to Enter or Complete An Educational Program, or to Secure and Hold Employment”*** - 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.

The CNMI State Workforce Development Board (SWDB) policy regarding the criteria for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" for out-of-school youth (WIOA section 129(a)(1)(B)(iii)(VIII)) and for in-school youth (WIOA section 129(a)(1)(C)(iv)(VII)) encompasses individuals who:

- Have no educational or employment goal.
- Are at risk of dropping out of school.
- Possess a poor work history or lack any work history.
- Have been fired from a job within the last 6 calendar months.

Additionally, the CNMI SWDB considers the following recommendations:

- Poor school attendance rates.
- A disability warranting a school Individualized Education Program (IEP).

- Lack of job readiness skills to secure and hold employment.
- Basic skills deficiency in reading, math, or language skills (below 8.9 grade levels).
- Below-average grades.
- Expulsion from school within the past 12 calendar months.
- Suspension from school within the past 12 calendar months.
- Previous placement in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 14-21.
- Children of incarcerated parents.
- Dropout from a post-secondary educational program during the past 6 calendar months.
- A poor work history, including no work history.
- Record of not being able to hold employment due to being fired or quitting two or more jobs in the last six months.
- History of substance abuse.
- Veteran status.
- No employment within the last 6 months.

## Single-area State Requirements

### **Public Comments** - to be finalized after the public comment period

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

- (1) *Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)*
- (2) *The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)*
- (3) *A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)*
- (4) *A description of the roles and resource contributions of the one-stop partners.*
- (5) *The competitive process used to award the subgrants and contracts for title I activities.*
- (6) *How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.*
- (7) *How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.*
- (8) *Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set*



*of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.*

### ***Entities Responsible for the Disbursement of Funds***

The CNMI's DOL Workforce Investment Agency Division through the CNMI Secretary of Labor is the designated entity responsible for the disbursement of WIOA Title I funds.

### ***Roles and Resource Contributions of One-Stop Partners***

In accordance with the Memorandum of Understanding (MOU) among the core programs, clear delineations of responsibilities and resource contributions have been established. Each partner within the workforce development system has defined roles and commitments outlined in the MOU to ensure a collaborative and effective approach to workforce development services.

The MOU serves as a guiding document that outlines the specific contributions, expertise, and resources that each partner brings to the system. Responsibilities are clearly defined to avoid duplication of efforts and ensure a seamless delivery of services. The MOU outlines resource contributions, which may include financial support, staff expertise, training resources, and any other relevant assets that each partner commits to the success of the workforce system.

Regular reviews and updates of the MOU will be conducted to accommodate changes in partner capacities or shifts in the workforce landscape, ensuring ongoing alignment with the goals and objectives of the workforce development system.

### ***Competitive Process for Sub-Grants and Contracts for Title I Activities***

The CNMI State Workforce Development Board employs a competitive process to award subgrants and contracts for Title I activities, adhering to the policies outlined in the Eligible Training Provider List (ETPL) for both initial and continued eligibility. This ensures that the allocation of grants and contracts aligns with established criteria, promoting fairness and transparency in the selection process.

### ***ITA's or Contracts and the Provision of Informed Customer Choice Requirements***

In accordance with Section 134, training services will be delivered through a combination of individual training accounts and contracts. The CNMI will ensure a coordinated approach in providing training services, emphasizing flexibility and responsiveness to individual needs. Regardless of the training approach, the CNMI is committed to meeting informed customer choice requirements. This involves providing comprehensive information to individuals about available training options, facilitating an understanding of the benefits and outcomes associated with each choice, and supporting individuals in making informed decisions that

align with their career goals ensuring autonomy to choose the training path that best suits their needs and aspirations.

### ***Coordination with Title I and Title II***

The State Workforce Development Board will ensure effective collaboration between Title I (Workforce Development Activities) and Title II (Adult Education and Literacy Activities) programs. This coordination will be facilitated through regular communication channels, joint planning sessions, and data-sharing mechanisms.

To carry out the review process, the State Workforce Development Board will employ a systematic approach. This involves conducting periodic assessments to evaluate the alignment of Title I and II activities, identifying areas of synergy, and addressing any potential gaps or redundancies. The board will engage in continuous monitoring, seeking input from relevant stakeholders, including representatives from adult education and literacy providers, to ensure a holistic and integrated approach to workforce development.

Additionally, the review process will include an analysis of performance metrics and outcomes to assess the effectiveness of the coordinated efforts. The State Workforce Development Board will remain flexible in adapting strategies based on the findings, fostering a dynamic and responsive system that maximizes the impact of both Title I and II initiatives on the overall success of the workforce in the state.

### ***Copies of Executed Cooperative Agreements***

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

- (1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;
- (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:
  - (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 most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.*

## **TITLE I-B ASSURANCES**

<b>The State Plan must include assurances that:</b>	
<b>1.</b>	<b>The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;</b>
<b>2.</b>	<b>The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program’s Disabled Veterans’ Outreach Program (DVOP) specialist;</b>
<b>3.</b>	<b>The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;</b>
<b>4.</b>	<b>The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);</b>
<b>5.</b>	<b>Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;</b>

6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults
	with chief elected officials in local areas throughout the State in determining the distributions;
7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
8.	The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;
9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
11.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);

**Adult Education and Family Literacy Act Program-** *The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).*

**Aligning of Content Standards** - *Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).*

Adult education programs have already adopted the Common Core State Standards into their curriculum and have aligned them with the College and Career Readiness Standards (CCRS) for Adult Education. In addition, adult education faculties have been trained on the CCRS implementation for Language Arts and Math as part of their professional development.

Programs measure student level and progress by using standardized assessment tools and by following assessment policy recommendations shared with them on an annual basis. Level gains College and Career Readiness Standards (CCRS) into the Student Learning Outcomes (SLOs) that are required in every course syllabus.

**Local Activities** - *Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, 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.*

The Northern Mariana Islands' Adult Education and Literacy Programs assist adults to become literate and obtain the knowledge and skills necessary to obtain a job or improve in their present jobs, to assist parents to be more involved with the educational development of their children, and to provide the opportunity for educationally disadvantaged adults to complete a secondary education or credential.

Under Title II of the Workforce Innovation Opportunity Act (WIOA), eligible individuals are those who:

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

Adult Basic Education (ABE) provides instruction in basic skills for adults with low literacy and numeracy skills. Adult Secondary Education (ASE) provides instruction for adults whose literacy and numeracy skills equate to a high school level and their goals are to obtain a high school equivalency diploma.

English as a Second Language (ESL) provides adults who lack proficiency in English and who seek to improve their literacy and competence in English.

In serving its students, the CNMI ABE program believes that adult learners learn best when:

1. They are comfortable with the learning environment and they attempt tasks that allow them to succeed within the contexts of their limited time and demanding lives;
2. They provide input into the planning of their learning goals and processes;
3. They have opportunities to engage in social learning, enabling them to learn from their peers and their instructors;
4. They have a variety of options appropriate to their learning styles and have opportunities to analyze and expand their modes of learning;
5. They can associate new learning with previous experiences and use those experiences while learning;
6. They have an opportunity to apply theory/information to practical situations in their own life; and
7. When the instructors deal with learning difficulties and disabilities tactfully and patiently.

The NMI Adult Basic Education Program has been designed for:

- Non-native speakers of English to improve their conversational, reading, writing, and numeracy skills in English;
- Adult students (16 years old and older) who did not complete their high school education, but plan to complete the high school equivalency examinations;
- Returning adult speakers who did not complete their high school education to prepare to take the high school equivalency examination;
- Adult literacy students to improve their basic reading, writing, and/or mathematics skill(s);
- Adults to be prepared for successful job placement, career training, or career performance; and
- Adults who are parents preparing to become effective first teachers of their children.

The performance measures for ABE programs are outlined in the Workforce Innovation Opportunity Act, Title II, Adult Basic Education and Family Literacy.

The ABE curriculum will integrate skills, which include digital literacy, critical thinking, and college and career readiness skills. These skills will assist students in improving their educational levels and successfully continuing education or training and entering employment.

The CNMI Adult Education State Office will run competitions for its funds under WIOA Title II using the revised 12 considerations and the 5 new application requirements. These applications will include alignments with local workforce plans and participation in the virtual one-stop system. The funds will be awarded to eligible providers that will provide some or all of the approved activities within the NMI region.

Eligible program providers may include some or all of the following:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;

- Workforce preparation activities; or
- Integrated education and training that 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 is for educational and career advancement.

The Adult Education Office under Subtitle C- Local Provision, Sec. 231 will make funds available for eligible competing agencies and these agencies shall consider the 13 considerations listed in Sec. 231 (e).

The Adult Education Office shall award two-year grants or contracts, on a competitive basis, to eligible providers within the state to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the state. Each eligible provider receiving a grant or contract under subsection (a) uses the grant or contract to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. Approved activities are the 8 listed in Sec. 203 of WIOA.

***Corrections Education and other Education of Institutionalized Individuals - Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:***

- *Adult education and literacy activities;*
- *Special education, as determined by the eligible agency;*
- *Secondary school credit;*
- *Integrated education and training;*
- *Career pathways;*
- *Concurrent enrollment;*
- *Peer tutoring; and*
- *Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

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

The CNMI State Department of Corrections (DOC) houses individuals remanded into their custody from the main island of Saipan and its two sister islands, Rota and Tinian, and at times from its smaller minimally populated northern island chain. The Department of Correction has been a partner with adult education and family literacy programs for many years. The new DOC Commissioner is an advocate for education and is very supportive. Although the new commissioner is supportive, budget constraints prevent us from offering

services. Like the rest of the CNMI Government, DOC is under austerity measures and is critically short-staffed. There are plans to offer an academy to hire recruits into DOC. To mitigate this obstacle, the office works with the court system closely with their Drug Court Program which was created in December 2016 as a system to affect the rehabilitation and recovery of drug offenders. Through the HOPE Recovery Center's case workers, individuals meeting eligibility requirements are provided services. They are offered adult education and literacy instruction. The instruction offered may integrate life skills, employability skills, and digital literacy skills to help the inmates obtain the needed skills to become self-reliant and contributing members of the island community after leaving and completing the Drug Court Program.

The Adult Education State Office will run competitions, that adhere to Sec. 231, for eligible providers, and from funds made available under section 222(a)(1) for a fiscal year, each eligible agency shall carry out corrections education and 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 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; (5) career pathways; (6) concurrent enrollment; (7) peer tutoring; and (8) transition to re-entry initiatives and other post-release services to reduce recidivism. Each eligible agency that is using assistance provided under this section to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. In addition to any report required under section 116, each eligible agency that receives assistance provided under this section shall annually prepare and submit to the Secretary a report on the progress, as described in section 116, of the eligible agency concerning the programs and activities carried out under this section, including the relative rate of recidivism for the criminal offenders served.

### ***Integrated English Literacy and Civics Education Program***

Funding for Integrated English Literacy and Civics Education is not available for the CNMI.

### ***Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA***

CNMI's Adult Education Office provides activities such as professional development opportunities; alignment of curriculum with standards and competencies that incorporate 21st-century skills, workplace readiness activities with academic and life skill courses; providing technology assistance, which includes staff training, program management improvement, and support; working with other partner agencies to increase enrollment and completion rates in adult education programs; and partnering with postsecondary institutions. The Adult Education Office will use the funds for required State Leadership activities as follows:

- aligns with core partners and one-stop partners to support the strategies of its Unified State Plan, including the development of career pathways,
- improve instruction by developing high-quality professional development programs that will include elements of reading instruction, dissemination of model programs and promising practices,
- provides technical assistance to providers based on researched evidence-based



instructional practices, responsibilities of one-stop programs, effective use of technology, and

- monitor and evaluate the quality of adult education activities in the CNMI.

Adult Education will use State Leadership funds for technical assistance to support local programs with programs, activities, and curriculum. The technical assistance will focus on data systems, assessment, integrated education and training, and career readiness and pathways.

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

The CNMI's Adult Education Office will be responsible for carrying out permissible State Leadership activities, if funding permits, by:

- maintaining membership and partnership in the Literacy Information and Communication System (LINCS) to collaborate with other fellow agencies and minimize duplication of effort,
- furthering works on standards implementation, including the use of aligned and approved assessments to improve student preparedness for college and the workforce as a result of their participation in Adult Education and Literacy programs,
- improving assistance to adult learners to effectively meet personal and program goals,
- assist eligible providers in meeting adjusted levels of performance, via technical assistance, site visits, ongoing communications, and targeted professional development and program improvement activities,
- offering proven program models and content for integrated education and training and career pathways, and
- requiring evaluations of AEFLA programs every four years

***Assessing Quality*** - Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

The CNMI's Adult Education Office will visit programs to discuss program management, professional development needs, performance data, and program compliance. If needed, specific training will ensure that proven and evidence-based educational and student support models are being applied in the classroom. Monitoring site visits will be conducted with programs that are identified as needing strategies for improvement of programs. With guidance from the Adult Education office, technical assistance will be given and will assist programs in developing an improvement plan. The Office will monitor the program closely and will conduct follow-up site visits to certify improvement plans are executed. Site visits may include classroom observations, and student surveys or evaluations. Monitoring examples may include financial, program management, data integrity, and teacher quality. All monitoring activities will result in a detailed compliance letter itemizing findings, recommendations, and commendations based on the implementation of the improvement plan and policy.

For ongoing assessment purposes, the Adult Education Office will require all programs to submit ongoing data that denote student participation levels and weekly attendance. Data submitted must also track student outcomes in the areas of obtaining or retaining employment, as well as transitioning into postsecondary education or training. Under WIOA, the Office will partner with the State Department of Labor (DOL) to track and report employment follow-up required in the new legislation.

The Adult Education Office assesses the quality of its professional development programs by conducting assessments and surveys on needs, services, and data. Programs will then create an action plan for professional development to address deficiencies or necessary improvements by outlining their strategies and activities. The Adult Education Office participates in program review under the Northern Marianas College's Academic Programs and Services (APS) Division.

### Adult Education and Family Literacy Act Program Certifications

*States must provide written and signed certifications that:*

#### Current Narrative:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes

5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

***Adult Education and Family Literacy Act Program Assurances***

*The State Plan must include assurances that:*

***Current Narrative:***

<b><i>The State Plan must include</i></b>	<b><i>Include</i></b>
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
<i>5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).</i>	Yes

*Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

*Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients’ responses in the State office.*

[GEPA 427 - Form Instructions for AEFLA Application Package](#)

*State applicants must respond to four questions.*

*The first of four questions is:*

*Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

***Current Narrative:***

The Adult State Office will include GEPA language in the Information, Narrative, and Application Checklist Section of the RFP. A GEPA Attestation Statement Form will be included in the RFP package for eligible providers to describe in detail how they will comply with the GEPA requirements.

Adherence to each agency’s GEPA statement is monitored regularly through quarterly desk audits, on-site reviews, and technical assistance visits. Programs are reviewed to ensure equitable access to, and participation in all of its AFELA programs by eligible students, teachers, and program beneficiaries with special needs. Monitoring includes but is not limited to, disaggregated review of enrollment data, intake processes, hiring practices, etc.

Northern Marianas College, which houses the Adult Education State Office, is committed to the principle of equal opportunity in education. The College prohibits discrimination, including harassment, based on race, gender, age, religion, color, national origin, ancestry, sexual orientation, marital status, disability, veteran status, or any other unlawful basis. This policy covers academic considerations such as admission and access to, and participation and treatment in, the College’s programs, activities, and services.

**2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?**

***Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.***

**[GEPA 427 - Form Instructions for AEFLA Application Package](#)**

***State applicants must respond to four questions.***

***The second of four questions is:***

***Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?***

**Current Narrative:**

Equitable access and participation in educational settings can be hampered by a multitude of barriers, encompassing factors ranging from individual needs to systemic biases. Some key categories are:

Individual needs:

- Disability: Physical, sensory, or intellectual disabilities can limit access to learning materials and participation in activities. Lack of proper accommodations or assistive technology further exacerbates this.
- Language barriers: Difficulty understanding the language of instruction or limited English proficiency can impede comprehension and communication, hindering academic progress and engagement.
- Socioeconomic disadvantage: Poverty can create obstacles in accessing technology, transportation, and educational resources. This includes issues like unreliable internet access, lack of devices, and limited funds for extracurricular activities or materials.
- Mental health challenges: Anxiety, depression, or other mental health difficulties can affect concentration, motivation, and attendance, impacting learning and participation.

Outside potential barriers:

- Homelessness or housing insecurity: Instability and lack of a safe learning environment can significantly impact academic achievement and participation.
- Family circumstances: Single parenthood, caring for younger siblings, or other family responsibilities can limit a student's time and focus on education.

These barriers often intersect and interact, creating a web of challenges for students, educators, and other beneficiaries. Addressing these barriers requires a multi-pronged approach that considers individual needs, tackles systemic issues, and promotes inclusive practices in educational settings.

***3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?***

***Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.***

**[GEPA 427 - Form Instructions for AEFLA Application Package](#)**

***State applicants must respond to four questions.***

***The third of four questions is:***

***Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?***

**Current Narrative:**

Applicants of the WIOA Title II funding will:

1. Assess the special needs of individuals requiring accommodations and ensure that the campus facilities for individuals with physical impairments allow access to the building, classrooms, and restrooms. The program will also engage in provisions such as extended seat time, use of large-print materials and tests, and other accommodations when needed.

2. The Counselor or designee will serve as the counselor for students with special needs and will assist with the planning for the individuals with special learning needs and for coordinating the delivery of appropriate educational services at each campus.
3. Assess the academic level of each student to ensure proper placement and provide reasonable accommodations as a part of the enrollment process at each campus. Administer the CASAS as appropriate for each participant utilizing the state assessment policy as a reference if needed.
4. The State Office will establish a data collection and data entry process to ensure that any student who meets the NRS definition of Disabled is accurately reflected in the data.
5. Advisors or designees will direct students to the HiSET Administrator for special accommodations for the HiSET test. Once approved, the testing center examiners will ensure that these accommodations are made available to the examinee. (Refer to HiSET policy regarding accommodations for exams and the process for requesting accommodations.)
6. Make available a brochure regarding program offerings on campus and sites.
7. When appropriate, refer students to the Office of Vocational Rehabilitation if they are interested and meet the requirements of the program.
8. Provide loaner laptops for those in need and open access to labs outfitted with computers and tutors to assist with assignments/projects.
9. Offer a variety of instructional delivery to students who are not able to attend face-to-face or online instruction. Scheduled packets to be picked and dropped off, partnering with organizations around the community to offer a computer lab space closer to home and computer-based tutoring have been effective in removing delivery obstacles.

***4. What is your timeline, including targeted milestones, for addressing these identified barriers?***

***Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.***



*GEPA 427 - Form Instructions for AEFLA Application Package*

*State applicants must respond to four questions.*

*The final of four questions is:*

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

**Current Narrative:**

The barriers identified exist every new cycle of incoming students. The program continuously evaluates its intake process to ensure services identify and address obstacles. When the obstacles or barriers are identified, a plan is drafted with the student to make certain it is the best route to student goal success.

There is no certain timeline given as this process is built into the program intake process. The program works closely with partners within the college and with the community to provide the best possible outcome for the student.

## VOCATIONAL REHABILITATION

### Program-Specific Requirements for State Vocational Rehabilitation Services Program

*The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.*

**(a) State Rehabilitation Council.** *All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B):*

(A) is an independent State commission.

(B) has established a State Rehabilitation Council.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC)	2	06/30/2023
Parent Training and Information Center	2	04/16/2021
Client Assistance Program	2	04/19/2021
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2	04/16/2021
<b>Community Rehabilitation Program Service Provider</b>	1	6/7/2023
<b>Business, Industry, and Labor</b>	1	9/21/2021

<b>Business, Industry, and Labor</b>	<b>1</b>	<b>9/21/2023</b>
<b>Business, Industry, and Labor</b>	<b>Vacant</b>	<b>N/A</b>
<b>Business, Industry, and Labor</b>	<b>Vacant</b>	<b>N/A</b>
<b>Disability Advocacy Groups</b>		
<b>Current or Former Applicants for, or Recipients of, VR services</b>	<b>1</b>	<b>06/07/2021</b>
<b>Section 121 Project Directors in the State (as applicable)</b>	<b>N/A</b>	<b>N/A</b>
<b>State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)</b>	<b>2</b>	<b>4/19/2023</b>
<b>State Workforce Development Board</b>	<b>1</b>	<b>7/18/2023</b>
<b>VR Agency Director (Ex Officio)</b>	<b>1</b>	<b>2/22/2023</b>

*If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.*

At the time of this writing, CNMI's SRC has two vacancies as indicated in the above chart; however, it has a consistent record of holding its regular quarterly meetings with an established quorum. CNMI's SRC regularly includes the matter of membership and/or vacancies as an item on their agenda for Executive Committee and General Membership meetings thus being their first step toward meeting this requirement. Furthermore, members will suggest and/or nominate individuals for consideration and, absent any objections, extend an invitation to said individuals. At present, the Council has not been able to identify and/or

secure qualified individuals to fill two vacancies for persons representing “Business, Industry, and Labor”; however, members continue to solicit by word of mouth for interested members of our local business community. It is also our experience that the Governor supports the decision of the SRC in selecting its members and has consistently appointed members accordingly.

*In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council’s input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council’s annual reports, the review and analysis of consumer satisfaction and other Council reports.*

Some things, like direct input from others (in this case from members of our State Rehabilitation Council), are best shared exactly as originally presented. The following were brainstorming ideas provided and presented by the FY ’23 SRC Chairperson and current FY ’24 Vice-Chair at the 3<sup>rd</sup> Quarter general membership meeting:

- a. **Resource Mobilization:** seek partnerships and funding to strengthen our capacity so that we can support a broader range of initiatives: Acceptance Campaign.
- b. **Advocacy:** advocate for policies that promote the rights and welfare of individuals with disabilities, with a focus on inclusive education, accessible transportation, and employment opportunities.
- c. **Education & Training:** collaborate with educational institutions to expand opportunities for individuals with disabilities to acquire skills and gain employment. Our efforts led to increased enrollment and successful job placements.
- d. **Technology & Accessibility:** plan to expand our efforts in promoting digital accessibility and technological solutions that empower individuals with disabilities.
- e. **Community Outreach:** We organized various outreach programs and events to raise awareness about disability issues and promote a more inclusive society. These initiatives helped bridge gaps between individuals with disabilities and their communities.
- f. **Community Engagement:** We aim to further engage with our local communities to foster understanding, acceptance, and support for people with disabilities.
- g. **Inclusive Community:** Our joint efforts will focus on creating inclusive communities where individuals with disabilities can live, work, and thrive without discrimination or barriers.



In the second SRC general membership meeting of FY 2023, members and OVR staff revisited 2020 – 2023 CSNA goals and priorities to discuss and update on progress. The SRC and OVR, in collaboration with various community stakeholders, will continue to participate in the development and/or execution of every triennial Comprehensive Statewide Needs Assessment (CSNA). Members of the SRC were able to provide direct feedback on the areas of focus for the 2024-2027 CSNA topic areas and research goals through participation in the focus group interviews

*Provide the VR agency’s response to the Council’s input and recommendations, including an explanation for the rejection of any input and recommendations.*

*[text box: List each recommendation/input followed by the VR agency response]*

Generally, OVR will look to facilitate and manifest any input and/or suggestions received from the SRC - no recommendations from SRC membership will be rejected unless it runs contrary to any existing law, regulations and/or the intent of the VR program. As an example, shared input above is incorporated into goals, priorities and strategies of this CSNA as outlined below.

Some enduring recommendations articulated in prior CSNA that remain relevant which here are modified slightly and carried forward in the new goals, priorities and strategies follow:

SRC Comment/Recommendation on Business/Employer Engagement:

The SRC recommends that OVR maximize its outreach efforts to include public service announcements/disability awareness information on the radio, in the newspapers, and other mediums to increase awareness of OVR's services.

OVR Response:

OVR will make every effort to continue sharing OVR related information in a variety of public mediums including but not limited to radio and newspapers to increase public awareness and most especially access to, and participation in the VR program. The OVR will also continue its partnerships with the DNP as well as the SWDB to ensure that it meets employer training needs in the areas of disability awareness and VR services.

SRC Comment/Recommendation on Transition and PreETS:

The SRC recommends the leveraging resources to bring the Pre-Employment Transition Services to more students on all three islands. The SRC also recommends that OVR collaborates with the DNP and other partners to explore ways to have more potentially eligible students participate in Pre-ETS programs.

OVR Response:

OVR agrees to work on increasing the number of potentially eligible students served under Pre-ETS and will continue to work with service providers and in-house staff to make that happen.

SRC Comment/Recommendation on Competitive Integrated Employment:

The SRC recommends that OVR continue its work with the Statewide Development Board (SWDB) utilizing the appropriate measures provided for in existing and/or new MOU's.

OVR Response:

OVR will continue to work with the SWDB and its core partners in accordance with requirements of WIOA.

**(b) Comprehensive Statewide Needs Assessment (CSNA), Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:**

*(1) The VR services needs of individuals with disabilities residing within the State, including:*

*(A) Individuals with the most significant disabilities and their need for Supported Employment;*

The following themes emerged on a recurring basis from the individual interviews and focus groups conducted for this assessment regarding the needs of individuals with the most significant disabilities, including their need for supported employment:

1. The lack of public transportation remains a major barrier to employment for many individuals with disabilities in the CNMI. Although some public transportation is available through the Commonwealth Office for Transportation Administration (COTA), the service is limited and has significant variations in pick up and drop off times.
2. Individuals with the most significant disabilities need assistive technology in order to be competitive in the workplace. The lack of AT providers and trainers in the use of the technology was a frequently cited barrier to employment.
3. The traditional model of supported employment is not able to be utilized in the CNMI because the Medicaid agency does not have the HCBS waiver that funds extended services. Consequently, the only SE that is provided must utilize natural supports for extended service provision and this has been unsuccessful in the past. The lack of SE services means that individuals with the most significant disabilities do not receive the services they need to obtain and retain employment.
4. The need to develop self-advocacy skills was a recurring theme for individuals with disabilities in the CNMI. This need was often cited when identifying the need for higher expectations for individuals with disabilities.
5. The pursuit of postsecondary education and training should be encouraged for individuals with disabilities in the CNMI. The acquisition of degrees and certificates can increase the ability of individuals with disabilities to obtain career-level jobs, which will increase their ability to be self-sufficient.
6. Many individuals with disabilities, especially those with the most significant disabilities, need training in basic computer skills in order to be employable. In addition, broadband Internet access is needed in many areas.
7. SSA beneficiaries are fearful of working because they fear they will lose their benefits. There is a need for benefits planning to be available to SSI and SSDI recipients and their families.
8. There is a need for substance abuse treatment options for individuals in all of the islands. Interview participants indicated that methamphetamine and alcohol abuse is common, with limited options for treatment.

*(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;*

The following themes emerged in the area of the needs of individuals with disabilities from different ethnic groups, including individuals who have been potentially unserved or underserved by OVR:

1. Tinian and Rota were the most frequently cited areas that may be underserved by OVR. It remains unclear as to whether the need for VR services on these islands is greater than OVR's ability to meet the need. OVR does have counselors assigned to visit the islands, and the demand does not appear to be greater than the current visiting schedule, which varies from monthly to quarterly.
2. Deaf individuals were cited as being potentially underserved by OVR because of the lack of interpreters available at the agency and in the community.
3. Although there were no underserved groups identified by race on a recurring basis, OVR's ability to serve immigrants from Asian countries has been impacted by legal interpretations since the last CSNA. The agency is in the midst of a Federal review of these opinions which may increase the agency's ability to serve individuals with disabilities that are classified as Commonwealth-only workers and workers from Freely Associated States.

*(C) Individuals with disabilities served through other components of the workforce development system; and*

The following information was gathered from the individuals interviewed for this assessment in the area of the needs of individuals with disabilities served through other components of the Statewide Workforce Development System:

1. While OVR and the Title I program (called WIA program in the CNMI) have a good working relationship, it is primarily one of referral at the local level. When individuals with disabilities come to the WIA program for services, they are referred to OVR as a matter of course.
2. There are very few instances of braided funding of cases between OVR and the WIA program. This is an opportunity for both agencies to expand instances of shared cases in the future.
3. It has been difficult for co-enrollment between core partners to be tracked in the CNMI. While OVR refers consumers to the WIA program for assistance with employment preparation services and job placement, there is no formal tracking system to identify how many consumers follow-through and what happens when they do enroll in services.



4. Regular cross-training between OVR and WIA was noted as an ongoing need that will help both agencies and increase collaboration and shared cases.

*(D) Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA.*

The following information was gathered from the individuals interviewed for this assessment in the area of the needs of youth with disabilities in transition:

1. The rehabilitation needs of youth and students with disabilities were noted as similar to those of the general population of consumers served by OVR, but work experience and soft skills were stressed more frequently for youth.
2. The lack of public transportation significantly impacts youth and their work options as they have difficulty getting to work experience sites.
3. OVR purchases pre-employment transition services through contracts and has hired a Transition Coordinator who is responsible for pre-employment transition services coordination activities.
4. The delivery of pre-employment transition services has been uneven in the last few years, but OVR has worked with providers to ensure that all five of the required activities are now readily available to students with disabilities.
5. Participants indicated that there is a need to share information about OVR and available services more frequently in the schools. It was repeatedly recommended that information target the parents and families of youth and students with disabilities. The family focus is essential as many families tend to shelter their children with disabilities and this can limit their child's exposure to the world of work.
6. Staff and partners indicate that students with disabilities are not applying for services from OVR even after they have received pre-employment transition services as a potentially eligible individual. Consequently, when the students are done receiving pre-ETS, they will not be connected with OVR and this impacts their successful transition to postsecondary education or work when they exit the school system.
7. There are many youth that have Autism or other significant disabilities that are served by the Center for Living Independently and could benefit from supported employment services. The lack of SE extended service providers limits the employment and support options for these youth.

- (2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.

The following themes were recurring from the individuals interviewed for this assessment in the area of the need to establish, develop or improve community rehabilitation programs serving individuals with disabilities in the CNMI:

1. There is a need to establish CRPs throughout CNMI for all VR services other than pre-employment transition services. There are no employment preparation, job development and placement services available for OVR consumers. There are no supported employment providers. OVR staff must provide these services directly as needed.
2. There are very few mental health service providers as well as specialty medical exam providers in Sapan and none in Tinian and Rota.
3. There is an opportunity for OVR to partner with a broadband Internet service provider to increase broadband access if the agency can refurbish two existing buildings.

**(c) Goals, Priorities, and Strategies.** *Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—*

- (1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and*

CNMI OVR contracted the professional services of San Diego State University – Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM)

to conduct a comprehensive statewide needs assessment (CSNA) of the VR needs of people with disabilities residing in the Commonwealth. In part, the purpose of the needs assessment was to help inform the development of OVR's State Plan.

The CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) were able to jointly develop their State Plan goals, priorities and strategies for Program Years 2024 - 2027 largely through participation of individual Council Members and OVR Staff in said Comprehensive Statewide Needs Assessment (CSNA) conducted in 2023-2024.

OVR and SRC ensure that the VR Portion of the Unified State Plan goals and priorities were developed collaboratively primarily through the process of most recent CSNA; however, it will continue to be a fluid work in progress to be examined and modified as needed through regular Council meetings in every given year. Findings and recommendations as well as the requirements of the WIOA common performance measures provide the basis for developing goals as such. Other available information on the operations and effectiveness of the Agency, such as fiscal, audits, RSA monitoring, including any other reports provided will be considered as well.

*(2) Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—*

- (A) Support innovation and expansion activities;*
- (B) Overcome barriers to accessing VR and supported employment services;*
- (C) 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, post secondary education, employment, and pre-employment transition services); and*
- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.*

*[text box: List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority]*

**Goal I:** Increase community awareness of OVR and available rehabilitation services for individuals with disabilities in CNMI.

- A. Priority 1:** Increase awareness in public schools
- B. Priority 2:** Increase awareness on Tinian and Rota
- C. Priority 3:** Increase awareness among employers

1. **Strategy:** Regular presentations to students and families in the high schools in partnership with school staff in order to share information about OVR services and how they can benefit youth in transition.
2. **Strategy:** Develop informational brochures in multiple languages and make available in government offices, especially all core Workforce Development partners.
3. **Strategy:** Regular public forums on Tinian and Rota – focusing on how OVR can help individuals with disabilities on the neighbor islands – focus on sharing success stories, possible self-employment opportunities, or government employment opportunities.
4. **Strategy:** Utilize radio and television public service announcements to increase awareness of OVR.
5. **Strategy:** Implement SRC recommendations for an Acceptance Campaign as resources allow including:
  - a. Inclusive sports and recreation days (ex: Disability Sports Fest)
  - b. Accessible picnic/social gatherings
  - c. Storytelling and poetry night
  - d. Art exhibition and performances
  - e. Accessible dining experiences
  - f. Community service projects
  - g. Accessible nature walks and outdoor activities

**Goal II:** Increase professional development opportunities for OVR staff

- A. **Priority 1:** Provide training for VR counselors and technicians on the VR process, Federal laws and regulations, WIOA performance measures, and providing quality services.
- B. **Priority 2:** Provide grant management and leadership training for OVR management staff.
  1. **Strategy:** Explore access to on-demand online training for rehabilitation professionals through resources such as the VR development group (<https://www.vrdevelopmentgroup.com/>).
  2. **Strategy:** Work with the Vocational Rehabilitation Technical Assistance Centers for Quality Employment and Quality Management (VRTAC-QE and VRTAC-QM) as appropriate for targeted training.
  3. **Strategy:** Apply for leadership staff to participate in the National Rehabilitation Leadership Institute (NRLI) or other leadership development training targeting Executive level staff in the VR program (<https://interwork.sdsu.edu/main/nrli/>).

4. **Strategy:** Apply for the VR Grants Management Certificate training through the VRTAC-QM (<https://www.vrtac-qm.org/mctraining/>).

**Goal III:** Increase the quantity and quality of employment outcomes for OVR consumers.

- A. **Priority 1:** Increase the number of consumers successfully exiting in employment by 5% per year.
- B. **Priority 2:** Increase the median earnings of consumers exiting in employment by 5% per year.
- C. **Priority 3:** Increase the number of OVR consumers in postsecondary education training programs.
- D. **Priority:** Increase the use of self-employment as an employment outcome for OVR consumers, especially in the neighbor islands.
  1. **Strategy:** Increase employer outreach and business engagement activities.
  2. **Strategy:** Increase the use of OJTs, internships and work experience training to provide exposure to work and demonstrate ability of OVR consumers to perform the essential function of jobs.
  3. **Strategy:** Work with CNMI government to recruit and hire individuals with disabilities for government jobs.
  4. **Strategy:** Identify successful self-employment cases in VR programs in other Pacific Territories such as Guam and/or American Samoa for possible replication in Tinian and Rota.
  5. **Strategy:** Increase assistive technology evaluation, provision and training for OVR consumers so that they can maximize their ability to live independently and perform essential functions of jobs.
  6. **Strategy:** Recruit additional organizations or individuals to provide employment services for OVR consumers, especially job development and placement.

**Goal IV:** Increase the use of supported employment for individuals with the most significant disabilities in CNMI.

- A. **Priority 1:** Identify funding sources for extended services in SE.
- B. **Priority 2:** Develop essential partnerships with agencies or organizations that provide critical support services necessary for SE.
- C. **Priority:** Increase the number of individuals that achieve an SE outcome by 5% per year.
  1. **Strategy:** Work with the Medicaid agency to request the home and community-based waiver (HCBS) for use as an extended services funding source.

2. **Strategy:** Recruit service agencies or individuals to become SE service providers.
3. **Strategy:** Provide training for OVR staff and partners on the SE model and how to implement the service for OVR consumers. OVR can request training from the VRTAC-QE to assist with developing and implementing SE.
4. **Strategy:** Utilize natural supports as an option for extended services and provide training for OVR staff and providers on how to develop natural supports for replication as appropriate.
5. **Strategy:** Develop a Community Work Incentive Coordinator (CWIC) in CNMI through training provided by Virginia Commonwealth University or other online training provider in order to decrease the fear of working and subsequent benefit loss by SSA recipients in CNMI.

**Goal V:** Expand and enhance the provision of transition and pre-employment transition services to youth and students with disabilities.

- A. **Priority 1:** Increase the number of students with disabilities that receive pre-employment transition services that apply for services from OVR by 10% per year.
- B. **Priority 2:** Increase the number of students with disabilities that receive work-based learning experiences as part of pre-employment transition services by 5% per year.
- C. **Priority:** Increase the number of transition-age youth with disabilities that enroll in postsecondary education training programs after exiting secondary school by 5% per year.
  1. **Strategy:** Provide regular informational meetings for student and their families regarding the scope and potential impact of OVR services in the schools.
  2. **Strategy:** Conduct intakes at the schools in order to increase the ease and convenience of application.
  3. **Strategy:** Examine rate structure and explore the possibility of revising rates to include a differential pay for work-based learning experiences.
  4. **Strategy:** In partnership with the schools, conduct field trips for high school students to Northern Marianas College to encourage the pursuit of higher education upon exiting the school system. This can be done as part of pr-ETS or in coordination with the Title I youth program.

5. **Strategy:** Explore funding an Upward Bound-like program to encourage enrollment in postsecondary education (<https://www2.ed.gov/programs/trioupbound/index.html>).

**Goal VI:** Increase and enhance collaboration with the Title I (called WIA) program in the CNMI.

- A. **Priority 1:** Increase co-enrollment in OVR and Title I programs
- B. **Priority 2:** Increase the number of cases where there is shared funding between OVR and Title I programs.
- C. **Priority 3:** Increase joint business engagement activities between OVR and Title I programs.
  1. **Strategy:** Highlight examples of joint cases where shared funding exists for replication.
  2. **Strategy:** Utilize integrated resource teams for shared planning.
  3. **Strategy:** Develop customized training programs in partnership with Title I and local employers.
  4. **Strategy:** Develop joint tracking system for co-enrollment.

**Goal VII:** Increase broadband Internet access for individuals with disabilities in the CNMI.

- A. **Priority 1:** Provide access to high-speed broadband Internet access for OVR consumers.
- B. **Priority 2:** Obtain RSA approval to utilize the establishment authority to refurbish two buildings for use as broadband Internet hubs and as sites to enhance OVR's ability to service consumers.
  1. **Strategy:** Utilize the establishment authority as authorized in 34 CFR 361.49 to refurbish existing OVR buildings for use as broadband Internet hubs.

**Goal VIII:** Increase OVR's ability to effectively serve the needs of businesses in the CNMI related to recruiting, hiring, accommodating and retaining individuals with disabilities.

- A. **Priority:** Increase employer education opportunities
- B. **Priority:** Increase work experience opportunities and permanent job placements for OVR consumers.
- C. **Priority:** Increase employer awareness of OVR and available services to meet the needs of employers.
  1. **Strategy:** Hire an employment specialist or business services representative as resources allow.

2. **Strategy:** Conduct employer trainings to increase disability awareness and sensitivity and increase employer’s perception of OVR as a resource.
3. **Strategy:** Conduct job fairs in partnership with the Title I program and with schools.

**(d) Evaluation and Reports of Progress: VR and Supported Employment Goals.** *For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—*

*(1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;*

The SRC and OVR jointly developed the key priorities and goals which were further informed by the YR 2020 – YR 2023 CSNA to ensure the alignment with WIOA and include expanded pre-employment transition services for qualified youth and students with disabilities, strengthened business/employer engagement, increased competitive integrated employment and improved agency performance. To this, the following key priorities and goals identified were:

**Priority 1: Transition and Pre-Employment Transition Services (PreETS)**

**Goal:** Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

**Extent Achieved:** Goal [] MET    [] PARTIALLY MET    [] NOT MET

This past Fiscal Year 2023 for the first time since the inception of the program, CNMI’s Office of Vocational Rehabilitation (OVR) was able to provide services in all five of the required pre-ETS activities to students with disabilities through private vendors from within the local community. More specifically, we were able to secure and hire a different vendor for each of the respective activities. While some of the vendors worked collaboratively in terms of their scheduling and other coordinating needs, each was responsible for providing unique services in accordance with their respective task / required activity. Furthermore, we were able to meet the 15 % expenditure requirement.

Additionally, we’ve made a staffing change and brought on a new hire to serve as our Pre-Employment Transition Specialist who will assist in coordination activities as well as provide direct pre-ETS services to students with disabilities. Presently we are on track to meet our 15% reserve expenditure requirement and provide services in all



five required activities again with the added, positive difference of being able to expand the span of service delivery time – whereas last year we were limited to starting services during the summer / special education extended school year, we intend to begin services as early as February this year. We hope this will result in more participants, but more importantly we hope it results in higher quality, more individualized and directed services.

**Goal:** Expand and improve the CNMI’s service delivery infrastructure and the Program’s capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

**Extent Achieved:** Goal [] MET    [] PARTIALLY MET    [] NOT MET

The decision and implementation efforts to recruit at least five different vendors each assigned to a specific required activity with intent to provide services in all five required activities expanded and improved the “CNMI’s service delivery infrastructure and the Program’s capacity for making available PreETS to students with disabilities in need of such services.” Given both the Authorized and Coordination activities, CNMI’s OVR will build upon this year’s delivery method to further expand services and increase participation in pre-ETS.

**Priority 2: Business/Employer Engagement**

**Goal:** Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

**Extent Achieved:** Goal [] MET    [] PARTIALLY MET    [] NOT MET

Recruitment and simultaneous hiring of private business vendors as briefly described for provision of pre-ETS services is an example of how OVR was able to increase partnerships with local businesses. Coincidentally, one of the private service providers also partners with OVR (as an employer) in the work experience training (WET), on-the-job training (OJT) and eventual hiring of qualified persons with disabilities. In what should serve as a clear expression and direct example of desired partnerships between OVR and the local business community, said provider penned an article for the local newspapers relating some of his experiences working with OVR and persons with disabilities availing of VR services as follows:

[https://www.mvariety.com/news/community\\_bulletins/delta-management-corporation-celebrates-years-of-success-with-ovr-consumers/article\\_2340458c-6d54-11ee-92cd-070083bc7fba.html](https://www.mvariety.com/news/community_bulletins/delta-management-corporation-celebrates-years-of-success-with-ovr-consumers/article_2340458c-6d54-11ee-92cd-070083bc7fba.html)

Additionally, OVR was able to speak briefly at a local Chamber of Commerce and Rotary Club of Saipan meetings wherein we responded to questions regarding both the WET and OJT programs in hopes of expanding opportunities for qualified adults and youth with disabilities. Link to news article regarding one of those events follows:

[https://www.mvariety.com/news/local/rotary-guest-speakers-discuss-power-of-vocational-rehabilitation/article\\_d826e678-aecb-11ee-a837-4f818864a2df.html](https://www.mvariety.com/news/local/rotary-guest-speakers-discuss-power-of-vocational-rehabilitation/article_d826e678-aecb-11ee-a837-4f818864a2df.html)

**Goal:** Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

**Extent Achieved:** Goal [ ] MET [ X ] PARTIALLY MET [ ] NOT MET

Editorials in the local newspapers by OVR staff provides a clear view of efforts to at engaging and partnering with local employers / business community. Subsequently outreach efforts as such also serve to develop capacity, knowledge and skills to effectively meet the needs of business/employers. Editorial examples follow:

[https://www.mvariety.com/news/community\\_bulletins/feature-national-disability-employment-awareness-month-primary-measure-of-success/article\\_cae49dfe-741d-11ee-8024-c77e29be9c0a.html](https://www.mvariety.com/news/community_bulletins/feature-national-disability-employment-awareness-month-primary-measure-of-success/article_cae49dfe-741d-11ee-8024-c77e29be9c0a.html)

[https://www.saipantribune.com/opinion/columnists/ovr-and-employers-partners-in-changing-lives/article\\_82ac2150-68c0-11ee-9737-6770448a1244.html](https://www.saipantribune.com/opinion/columnists/ovr-and-employers-partners-in-changing-lives/article_82ac2150-68c0-11ee-9737-6770448a1244.html)

[https://www.mvariety.com/news/community\\_bulletins/feature-ndeam-advancing-access-and-equity-1/article\\_44045530-6393-11ee-948b-4f5c2976c140.html](https://www.mvariety.com/news/community_bulletins/feature-ndeam-advancing-access-and-equity-1/article_44045530-6393-11ee-948b-4f5c2976c140.html)

[https://www.mvariety.com/news/opportunity-to-contract-for-services-with-ovr/article\\_3c7c6150-b726-11ed-a0b3-636c2d33bad8.html](https://www.mvariety.com/news/opportunity-to-contract-for-services-with-ovr/article_3c7c6150-b726-11ed-a0b3-636c2d33bad8.html)

In what may well be a first for the CNMI, the Chairperson of the State Rehabilitation Council (SRC) also penned a speech relating to National Disability Employment Awareness Month (NDEAM) which was also printed in the local newspapers as follows:

[https://www.mvariety.com/news/community\\_bulletins/feature-on-the-importance-of-creating-inclusive-workplaces/article\\_f989dae2-6393-11ee-8cbb-eff7007187fb.html](https://www.mvariety.com/news/community_bulletins/feature-on-the-importance-of-creating-inclusive-workplaces/article_f989dae2-6393-11ee-8cbb-eff7007187fb.html)

The following press release speaks further on the matter of partnerships with the business community:

[https://www.mvariety.com/news/ovr-clients-to-be-included-in-employer-work-plans/article\\_1760d630-cd74-11ed-a445-b31f4c5bcad9.html](https://www.mvariety.com/news/ovr-clients-to-be-included-in-employer-work-plans/article_1760d630-cd74-11ed-a445-b31f4c5bcad9.html)

**Priority 3: Competitive Integrated Employment**

Goal: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

**Extent Achieved:** Goal  MET      PARTIALLY MET      NOT MET

**Priority 4: Agency Performance**

**Goal:** Improve overall Agency performance

**Extent Achieved:** Goal  MET      PARTIALLY MET      NOT MET-

(2) *Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and*

Not applicable.

(3) *The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).*

Innovation and Expansion (I&E) funding was used, in accordance with federal regulation, to provide for allowable activities for the State Rehabilitation Council (SRC). Consistent with OVR goals and priorities, I&E activities supplement direct efforts to promote competitive integrated employment outcomes for students and youth with disabilities, extend the community's capacity to serve persons who are blind or visually impaired, and integrate employment outcomes for persons with developmental disabilities. During PY 2023, the SRC spent \$16,271 from I&E funding to carry out their allowable activities including website maintenance and development, client information tracking and case management system, NDEAM activities, zoom license, and annual report.

**(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

(1) Acceptance of title VI funds:

(A)  VR agency requests to receive title VI funds.

(B)  VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

(2) *If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.*

[text box]

(3) *Supported employment services may be provided with title I or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.*

[text box]

(4) *Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR*

*361.5(c)(19)(v).*

[text box]

**(f) Annual Estimates.** *Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:*

(1) *Estimates for next Federal fiscal year—*

(A) *VR Program; and*

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving
-----------------------------------	--	---	---------------------------------------	---

				Services (if applicable)
N/A				

(B) Supported Employment Program.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)

**(g) Order of Selection.**

The VR agency is not implementing an order of selection and all eligible individuals will be served.

The VR agency is implementing an order of selection with one or more categories closed.

\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

*Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.*

(1) For VR agencies that have defined priority categories describe—

(A) *The justification for the order;*

[text box]

(B) *The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and*

[text box]

- (C) *The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.*

[text box]

- (2) *Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?*

[check box] Yes

[check box] No

**(h) Waiver of Statewideness.** *The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."*

**Not applicable.**

**(i) Comprehensive System of Personnel Development.** *In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:*

- (1) Analysis of current personnel and projected personnel needs including—

- (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

The Office of Vocational Rehabilitation currently employs thirteen (13) personnel that provide VR services to an estimated two hundred (200) individuals/consumers per year.

VR administrative support and services are provided by:

- One (1) Director;
- One (1) Fiscal Officer (with over 40 years dedicated to CNMI OVR);

- One (1) Data Analyst
- One (1) Administrative Clerk,

Direct VR Counseling and ILOB services are provided by:

- One (1) Case Services Manager
- Three (3) VR Counselors (General),
- One (1) Pre-Employment Transition Specialist / ILOB Caseworker
- Three (3) VR Counselor Aides, and
- One (1) Office Clerk

- (B) *The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and*
- (C) *Projections of the number of personnel, broken down by personnel category, who will be needed by the VR 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.*

<b>Personnel Category</b>	<b>No. of Personnel Employed</b>	<b>No. of Personnel Currently Needed</b>	<b>Projected No. of Personnel Needed in 5 Years</b>

- (D) *Ratio of qualified VR counselors to clients: Approximately 50:1 (clients to counselors)*
- (E) *Projected number of individuals to be served in 5 years: Approximating an average of 200 individuals per year, projected number of individuals to be served in 5 years will be 1,000.*

(2) *Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:*

(A) *A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.*

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates

(B) *The VR agency’s plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR 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.*

[text box]

(C) *Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:*

- i. *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*

- ii. *Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.*

[text box]

- (3) *Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency 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, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

[text box]

- (4) *Method(s) the VR agency uses to ensure that personnel 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.*

[text box]

- (5) *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.*

[text box]

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

**(j) Coordination with Education Officials.** *In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—*

- (1) *Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.*

Section 20 of OVR’s Policy and Procedures Manual states: “The Rehabilitation Act of 1973, as amended, requires the development of cooperative agreements, formal interagency agreements and memorandums of understanding, as appropriate, with other public agencies (CFR 361.22, CFR 361.23, 361.24). The cooperative agreement is designed for use whenever public agencies enter into agreements and does not involve an exchange of funds. This may be accomplished by executing a COOPERATIVE AGREEMENT BETWEEN PUBLIC AGENCIES, and obtaining required signatory approvals. The Rehabilitation Act of 1973, as amended, also allows for third-party cooperative arrangements (CFR 361.28). Inter local contracts with public agencies may be entered into by executing an INTERLOCAL CONTRACT BETWEEN PUBLIC AGENCIES and obtaining required signatory approvals. The interlocal contract is designed for use whenever public agencies contract with one another for the performance of any government service” (p. 78).

Where specifically School-to-Work Transition is concerned, the CNMI Office of Vocational Rehabilitation (OVR) and the Public School System-Special Education Program (PSS-SPED), have an existing Interagency Cooperative Agreement (ICA) executed in 2018 during which necessary revisions per the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014 were taken into consideration. Section 8 of the ICA talks about Pre-Employment Transition Services: “The Rehabilitation Act of 2014, as amended (under Title IV of the Workforce Innovation and Opportunity Act signed into law by President Obama on July 22, 2014) requires OVR to provide eligible students with disabilities under IDEA or Section 504, ages 16-21 years, with pre-employment transition services (PREETS), such as: Job exploration counseling, Work-based learning opportunities, Counseling on post-secondary educational opportunities, Workplace readiness training, and Instructions in self-advocacy. PSS-SpEd will provide assistance to OVR in the coordination with employers on transition services including PreETS for students with disabilities” (p. 3).

Procedures regarding the timely development and approval of individualized plans for employment for all CNMI OVR consumers, including students with disabilities, may be found in the Policy and Procedures Manual, under Section 16: INDIVIDUALIZED PLAN FOR EMPLOYMENT (IPE): “After determination of eligibility, Counselor shall develop an individualized plan for employment (IPE) within 60 work days, and the identification of

rehabilitation needs, there will be an IPE initiated” (p. 35). In addition to the ICA, the School-to-Work Transition Guidelines provides more practical information including best practices for delivering transition services. According to the Guidelines, the CNMI OVR must ensure that the “Individualized Plan for Employment (IPE) should be completed as soon as eligibility has been determined but no later than 60 days, and the necessary information has been gathered. An IPE should be in place prior to graduation or exit from school. The IPE is to be coordinated with the student’s Individual Education Program (IEP) that is developed by the school system’s transition team” (p. 2).

*(2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:*

- (A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;*

*Section 3 of the Interagency Cooperative Agreement states that the “OVR and PSS-SpEd will engage in providing the other with consultation and technical assistance to plan for and ensure the smooth transition of students with disabilities” (p. 2).*

VR staff are essentially a resource for schools and families to help educate students about supports needed for a smooth transition from school to work, further training, education and/or independent living. To achieve this objective, the following general activities are completed:

- Consulting with and educating schools, parents, students, and other agencies about VR services.
- Conducting outreach that includes VR orientation presentations, dissemination of VR brochures, and technical assistance with transition IEP planning.
- Participation in transition fairs, job fairs, and other activities targeting parents and students to increase appropriate referrals.
- Conducting early identification and assessment of student needs for transition services.
- Bringing the VR program to the school campuses through continued co-location efforts.
- Communicate relevant VR policy which may impact a student’s application or eligibility for VR services.
- This assistance may be requested by phone, email, or in person and provided using alternative means (e.g., video conferences and conference calls).

- (B) *Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;*

Section 3 of the Interagency Cooperative Agreement states that the “OVR’s involvement during the transition planning phase of the IEP helps to ensure that the vocational or employment-related provisions of the IEP provide a bridge to the vocational rehabilitation services needed under an IPE for those students determined eligible for the vocational rehabilitation program” (p. 1).

As an extension of the 2018 Interagency Agreement between the Office of Vocational Rehabilitation and the Public School System-Special Education Program, the School to Work Transition Guide (SWTG) was developed to ensure a smooth transition process. This guide suggests best practices that can be used as a tool to assist in the improvement of communication, coordination, and services for students with disabilities transitioning from school to work. It was designed to be useful for all persons and agencies (stakeholders) involved in the transition process. This document varies depending upon the stakeholder’s needs at the time of use. The Agencies and Programs involved in the development of this guide agreed to the following core values:

- Transition is Essential: Transition is important for all students, regardless of disability. Transition provides the focus and early planning for all youth with disabilities to move towards achieving their goals.
- Individualization: Transition services are not the same for all students. Services are person-specific and developed with the young adult, their family, and those who know them well based on their interests, abilities, and needs.
- Outcome Focused: Transition services are specific outcomes driven activities designed to help students achieve their goals of training/education, employment, and independent living.
- Achieve More Together: Working together, as equal partners, creates a seamless transition from school to work. All can assist the student and their families identify their needs and develop plans to meet these needs. Everyone has something to contribute and leveraging of funds and staff leads to exceptional outcomes.
- Student and Family Involvement: Students and their families are actively involved in the entire transition process including service decisions. They are full and meaningful partners in the process.
- Identification of Roles and Process: Identifying the roles of every partner and the processes needed, sets clear expectations between partners about areas of focus and expertise, responsibilities, and where to go for assistance beyond the

individual programs scope of practice. Knowing where to go for the right answers allows for smooth discussions about possibilities.

- Increase Understanding: Share information so all partners are aware of available resources to help in transitioning.

(C) *The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;*

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED) April 02, 2018.

#### *Section 10 - Mutual Responsibilities*

- Training and Technical Assistance: OVR will provide consultation and technical assistance to PSS-SpEd that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. Develop and provide common training and professional development opportunities to improve transition and employment results to youth.
- Planning and Coordination: Joint collaboration in the development/continuation of a work group (Transition and Coordination Team-TACT) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. The TACT will also explore and identify pre-employment transition services and transition-related services (work-based learning; internships; apprenticeships; dual enrollment programs; industry recognized credential programs and college programs). (Supporting document: School to Work Transition Guidelines) Ensure mutual support for and participation in the respective programs required State Plan and Needs Assessment process. Further, parties agree to work collaboratively to coordinate with and engage employers on pre-employment transition services and transition services for youth and students with disabilities.
- Data Sharing: Sharing of data, within the bounds of confidentiality, of eligible students regarding transition services and outcomes.
- Transition Services/Accommodations: Identify and disseminate information about pre-employment transition services and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- Assistive Technology: Upon completion of the free appropriate public education (FAPE) of many eligible students, PSS-SpEd is left with items of assistive technology which have been required by student's IEPs and which have been customized for particular students or are otherwise unlikely to be used by different

students. Such items of assistive technology often are stored until they become obsolete.

Co-Location Initiative: Parties agree to continue to lend their support for OVR staff, i.e, vocational rehabilitation counselor, to be based at the public high schools for a rehabilitation program, conduct Q&A with stakeholders, i.e. students, parents, and school personnel, entertain applications for vocational rehabilitation services, conduct initial interviews, and increase referrals to OVR.

*Section 11* of this document describes further the roles and responsibilities for each agency as applicable to their regulatory authority.

*Section 12* - Financial Responsibility of the Interagency Cooperative Agreement States: When a student with a disability is both in school and has an IPE with OVR, the cost of services necessary for both the student's education and for the student to become employed, will be delineated between PSS-SpEd in terms of what will work with PSS-SpEd representative in determining which is needed to complete high school coursework and which services pertain to fulfilling the IPE.

When another adult service provider agency has been identified by the IEP team (that can pay part or all of the cost of a specific service or device), a representative of that agency shall be invited and included in the IEP meeting where the responsibility for payment is negotiated. Arrangements to share the cost of a given service or device will be fully reflected and explained in the IEP or the IPE, or both. (Note: OVR is a secondary source of financial assistance.

*Section 4* - Transition Planning Related to the Individualized Education Program (IEP): Schools usually designate a staff person as a Transition IEP Coordinator. This person is responsible for communicating the student's transition services needs to agencies representatives who were unable to attend. For CNMIPSS-SpEd, responsibility for the coordination of transition services is transferred to the school level and falls within the purview of SPED teachers.

The school must obtain agency commitments to provide or pay for needed transition services or reconvene the IEP to determine alternate methods for meeting the student's needs. It is important to the VR Counselor to respond to school staff on the progress of mutual students, with appropriate parental, legal guardian, or student (at age 18) consent.

- (D) *Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;*

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED)

*Section 5 - Procedures for Outreach - OVR and PSS-SpEd will continue to support outreach activities that will increase referrals to OVR in an effort to provide eligible students with disabilities a smooth school to work transition. (Refer to the School to Work Transition Guidelines for detailed description on procedures for outreach.)*

Outreach activities of the VR Counselor are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in pre-employment transition services and transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the following:

- Vocational Rehabilitation program purpose
- Eligibility requirements
- Procedures
- Scope of services that may be provided to eligible students
- Pre-employment transition services that may be provided to potentially eligible students

The VR Counselor can provide information regarding OVR services that can be passed on to students and their families by contacting the SPED Teacher, Transition Coordinator, SPED Coordinator, or School Counselor. Ways the VR Counselor may conduct outreach include:

- Providing VR brochures and business cards to the school
- Presenting at the first Open House or Orientation held at the school
- Conducting regularly scheduled school visits (co—location)
- Participating in Transition and job fairs at the school
- Attending school IEP meetings when invited
- Speaking about pre-employment transition services and VR services at school staff meetings, teacher in—service training, student/parent group meetings, or interagency meetings

The VR Counselor should work with school staff to ensure referrals of students with disabilities to the OVR program at the beginning of the school year as follows:

- Referral for pre-employment transition services beginning at age 16 for all students with disabilities who may need them
- Referral and application for OVR services is recommended at age 16 for students who are involved in or plan to be involved in Community-Based Work Experiences (CBWE)
- Although OVR does not impose an age limit on when a student can apply for VR Transition services, they encourage students to do so two years prior to school exit

- Students at high risk of dropping out should be referred if they are old enough to begin training or searching for employment
- The VR Counselor may act in an advisory capacity for at-risk youth who are too young to apply and/or do not have a disability

This should allow sufficient time for determining eligibility, identifying OVR service needs, referring students to community services, and developing the approved IPE prior to the student's exit from school.

*Section 8 - Services Prior to Referral* Transition services, including pre-employment transition services, may be provided by OVR to students with disabilities beginning at age 16 (or younger, if the IEP team determines it is appropriate), who have not yet applied for VR services. Consultation to students and families, technical assistance to schools, and participation in IEP meetings when invited.

OVR will collaborate with PSS-SpEd to provide any or all of the five pre-employment transition services required activities described in the next section to students with disabilities (ages 16-21, or younger, if the IEP team determines it is appropriate).

- (E) *Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and*
- (F) *Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.*

**(k) Coordination with Employers.** *In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.*

CNMI OVR will continue to strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services for consumers with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management (SHRM), Rotary Club,



Hotel Association of the Northern Mariana Islands (HANMI) and other similar venues,

- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,
- Participate in job/career fairs sponsored by various partners within our community, including but not limited to Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment,
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,
- Provide professional development and support to the Employment Specialist, whose duties and responsibilities revolve around business relations and employer engagement,
- The Saipan Chamber of Commerce had graciously offered for OVR to utilize the Chamber's website as a repository of disability employment resources for employers, and
- The SRC general membership meetings will provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This practice started in PY 2017 during the Council's 12/21/17 general membership meeting and will continue for all subsequent regular meetings.

*2. transition services, including pre-employment transition services, for students and youth with disabilities.*

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate Transition services, including Pre-Employment Transition Services (Pre-ETS) for students with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs, and what opportunities could be available to PreETS, especially with regards to Work-Based Learning Experiences (WBLE) and transitioning students,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Hotel Associations of the Northern Mariana Islands

(HANMI), Human Resource Management Rotary Club, and/or other similar venues,

- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge measure effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment as well as WBLE opportunities,
- Participate in job/career fairs (for consumer or student support) sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment as well as for Pre-Employment Transition Services (i.e. WBLE/OJT/Apprenticeship Programs)
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,
- Ensuring proper supports and training for the Employment Specialist whose duties and responsibilities revolve around business relations and employer engagement,
- The SRC general membership meetings provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This forum also affords OVR the opportunity to promote and market the PreETS and transitioning students.

**(I) Interagency Cooperation with Other Agencies.** *In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:*

- (1) *State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998;*

The CNMI Assistive Technology Program is a federally-funded program under the CNMI Council on Developmental Disabilities and authorized under the Assistive Technology Act of 1998. In 1994, the CNMI Council on Developmental Disabilities was funded to develop, implement, and administer a Commonwealth-wide program to meet the assistive technology needs of persons with disabilities, which was known as STRAID. However, as

a result of the new requirements of the Assistive Technology Act of 1998, as amended, the program is now called the CNMI Assistive Technology Program (CNMI ATP), which is under the CNMI Council on Developmental Disabilities. The CNMI ATP provides assistive technology-related services CNMI-wide to help children and adults with disabilities live productive, independent, and good quality lives. As an AT Act program, CNMI ATP carries out state level and leadership activities. State level activities consist of Device Reutilization Program, Device Loan Program and Device Demonstration Program. Furthermore, CNMI ATP conducts state leadership activities CNMI-wide such as training, technical assistance, public awareness and outreach, information dissemination and referrals, and coordination and collaboration with various public, private and non-government entities.

*(2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*

The CNMI OVR does not currently have cooperative agreements with any programs funded under the USDA.

But, as previously stated, the OVR will, when appropriate, continue to develop agreements with other state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

*(3) Non-educational agencies serving out-of-school youth;*

- Workforce Investment Agency (WIOA Title I Program) for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.
- Continue to maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodation and effective communication with individuals with varying disabilities.
- Latte Training Academy for workforce development providing skilled and certified (Allied Health, Hotel & Hospitality, Business, and Information Technology) vocational training and career enhancement.
- Island Training Solutions for practicable ready to use training for public and private sector staff and management in Customer Service Team Building, Problem Solving, etc.

(4) *State use contracting programs;*

Not Applicable.

(5) *State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);*

Office of the Governor:

- CNMI Medicaid Office for cost-sharing arrangements for services provided and referrals. Though a Memorandum of Understanding (MOU) with Medicaid exists, a current review may be required.

(6) *State agency responsible for providing services for individuals with developmental disabilities;*

CNMI OVR partners with the Council on Developmental Disabilities by engaging in activities that promote and improve our public VR program; identify and address the employment and other needs of people with disabilities; strengthen partnerships among the local Disability Network Partners (OVR, CDD, Northern Marianas Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, CNMI Assistive Technology Program, Transition Coalition, Employers, community rehabilitation programs, etc.); advocate that people with disabilities receive timely and quality services from community providers; educate the public on the mandates of federal and local statutes as they pertain to people with disabilities; leveraging of resources and expertise on similar State Plan goals/objectives for the benefit of VR consumers and potential applicants; among other things.

Collaboration with the CDD takes on the following form:

- Regular communications throughout the year.
- Involvement in mutual councils and boards, such as the Council on Developmental Disabilities, the State Rehabilitation Council, the Special Education State Advisory Panel, the Consumer Advisory Committee of the University Center for Excellence in Developmental Disabilities, the Statewide Independent Living Council, etc.
- Involvement in mutual coalitions, for instance, the Transition Coalition and the Disability Network Partners.
- Attendance and participation at each respective programs' public hearing or forum to help inform the State Plan development.
- Leveraging of resources and expertise in areas of employment, advocacy, and systems change resulting in competitive, integrated, and timely services.
- Information and referral related to employment.

CNMI CDD is committed to promoting systems change, providing advocacy, and supporting the independence, productivity, integration, and inclusion of individuals with developmental and other disabilities in our island community.

(7) *State agency responsible for providing mental health services;*

Commonwealth Healthcare Corporation:

- Transitional Living Center for Work Experience Training for OVR and CGC's mutual consumers and Day Treatment Program to help increase function and independence.
- Non-Communicable Disease Bureau (NCDB) for information/referral, public education and awareness, advocacy, and training assistance.
- Students and Youth with Special Health Care Needs Program for care coordination of services to target group between birth and 21 years old.
- Community Guidance Center (CGC) for referral of rehabilitation services and increased collaboration/coordination of mutual clients to ensure meeting their employment and rehabilitation needs.
- Maternal and Child Health's Prevention Program for the promotion of health and wellness of women, infants, children (including children with special healthcare needs), adolescents and their families; cost-sharing of DNP-sponsored activities; information/referral; and outreach to increase education and awareness.

(8) Other Federal, State, and local agencies and programs outside the workforce development system; and

[text box]

(9) Other private nonprofit organizations.

[text box]