2024-27
PUERTO RICO UNIFIED STATE PLAN
WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
MODIFICATION DRAFT

CONEXIÓN LABORAL

DEPARTAMENTO DE DESARROLLO ECONÓMICO Y COMERCIO
GOBIERNO DE PUERTO RICO

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LIST OF ABBREVIATIONS

AAC	Assessment and Adjustment Centers
AAO	Assessment and Adjustment Office
AAU	Assessment and Adjustment Units
ACAA	Administration of Compensation for Automobile Accidents
ACLC	Air Cargo Logistics Community
ACS	American Community Survey of the US Census Bureau
ADA	Americans with Disabilities Act
AEFLA	Adult Education and Family Literacy Act
AEFLA P	Adult Education and Family Literacy Act Program
AEMEAD	AEMEAD is a Spanish Acronym to Puerto Rico State Agency for Emergency and Disaster Management
AEP	Alternative Education-Adult Education Program
AI	Artificial Intelligence
AJC	American Job Centers
APH	American Printing House for the Blind
APS	APS is a Spanish Acronym to Primary Health Care. Means is Spanish: "Atención Primaria de Salud".
APSE	Association for Persons in Supported Employment
ARS	Agricultural Recruitment System
ASLS VRI APP	App is used by individuals to access professional interpretation services via video or voice
ASPM	Assistant Secretary of Permit Management
ASSMCA	ASSMCA is a Spanish Acronym to Substance Abuse and Mental Health Services Administration
AT	Assistive Technology
ATAA	Alternative Trade Adjustment Assistance
BD	Big Data
BDE	Economic Development Bank for Puerto Rico
BDO	Business Development Office
BIS	Budget Information Summaries
CAME	Support and Employment Modalities Centers
CCAT	College of Cinematography, Arts and Television
CCR	College and Career Readiness
CCR Standards	College and Career Readiness Standards
CEPR	CEPR it's a Spanish Acronym to State Rehabilitation Council of Puerto Rico

CFR	Code of Federal Regulations
CIL	Centers for Independent Living
CJ YDP	Club JOVEM (Youth Development Program)
COMPU	COMPU it's a Spanish Acronym to Special Education Scheduling and Placement Committee
CPR	Community Rehabilitation Programs
CPTOPR	CPTOPR is a Spanish Acronym to College of Occupational Therapy Professionals of Puerto Rico
CPTSPR	CPTSPR is a Spanish Acronym College of Social Work Professionals of Puerto Rico
CRCR	CRPR is a Spanish Acronym to College of Rehabilitation Counseling Professionals of Puerto Rico
CSEM	Center of Support and Employment Modes
CTE	Career and Technical Education
CUS	Unique Service Center
DDEC	Department of Economic Development and Commerce of Puerto Rico
DE	Department of Education
DEP-AEP	Department of Education-Adult Education Program
DHS	Department of Homeland Security
DOL	Department of Labor
DSPID	Department of Health - Division of Services for People with Intellectual Disability
DVA	Department of Veterans Administration
DW	Dislocated Workers
EAI	Economic Activity Index
EEL/CE	Integrated English Literacy and Civics Education
EEOC	Equal Employment Opportunity Commission
EIF-ICA 60-2019	Economic Incentives Fund of the Incentives Code Act 60- 2019
ELLs	English Language Learners
EPPLPR	Energy Public Policy Law of Puerto Rico
ERP	Eligibility Review Program
ES	Employment Services
ETPL	Eligible Training Provider List
FEMA	Federal Emergency Management Agency
GDP	Gross Domestic Product
GED	General Educational Development Test
GEPA	General Educations Provisions Act
GUS	Geographic Unemployment System

HUD	US Department of Housing and Urban Development
ICT	Information Technology and Telecommunications
IDD	Institute of Developmental Disabilities
IDEA	Individuals with Disabilities Education Act
IELCE	Integrated English Literacy and Civics Education
IEP	Individual Employment Plan
IET	Integrated Education and Training
ILC	Independent Living Centers
ION	Innovation and Opportunity Network
IPE	Individualized Plan for Employment
IRAP	Industry Recognized Apprenticeship Programs
ISS	Individual Service Strategy
ISY	In school Youth
ITA	Individual Training Accounts
ITE	Integrated education and training
IWT	Incumbent Worker Training
JC	Job Corps Program
JVSG	State Jobs for Veterans Grants
L135-2014/L60-ICIFL-YE	Law 135-2014 (Now Law 60 Incentives Code Incentives and Financing Law for Young Entrepreneurs)
LWDA	Local Workforce Development Areas
LWDA	Local Worforce Development Area
LWDB	Local Workforce Development Boards
MIP	MIP is an Acronym of the Financial Management System
MOU	Memorandum of Understanding
MSFW	Migrant and Seasonal Farm Workers
MSG	Measurable Skill Gains
NCIL	National Council on Independent Living
NCRE	National Council on Rehabilitation Education
NDWG	National Dislocated Worker Grants
NECA	National Employment Counselor Association
NGWD	National Dioslocated Workers Grant
NRS	National Reporting System
OA	Office of Apprenticeship
OCTAE	Office of Career, Technical and Adult Education
OLRHR	Office of Labor Relations and Human Resources
OMB	Office of Management and Budget

OPEVE	OPAVE is a Spanish Acronym to Planning, Validation and Statistics Office in DDEC
OSEM	Office of Support and Employment Modes
OSY	Out-of-School Youth
OSY	Out of School-Youth
PDJ	Youth Development Program
PEI	PEI is a Spanish Acronym to Individualized Educational Program
PETSO	Pre-employment Transition Service Office
PIPE	PIPE it's a Spanish Acronym to Individualized Plan for Employment
PIR	Development of Individual Reemployment Plan
PPC	Placement and Programming Committee
PRAI	Puerto Rico Association of Industrials
PRATP	PRATP it's a Spanish Acronym to Assistive Technology Advisory Council of Puerto Rico
PRDE	Puerto Rico Department of Education
PRDOL	Puerto Rico Department of Labor
PRE-ETS	Pre-Employment Transition Services
PRG	The Policy & Research Group
PRIC	Puerto Rico Incentives Code
PRIS	Participant Record Information System
PRRID	Puerto Rico Registry of Interpreters for the Deaf
PRT&EC	Puerto Rico Trade and Export Company
PRVRA	Puerto Rico Vocational Rehabilitation Administration
PY	Program Years
QCPMO	Quality Control and Programmatic Management Office
QRA	Quarterly Report Analysis
RA	Registered Apprenticeship
RCSO	Rehabilitation Counseling Service Office
RESEA	Reemployment Services, and Eligibility Assessment Program
RFP	Request for Proposal
RI	Related Instruction
RR	Rapid Responses
RRR	Roosevelt Roads Redevelopment
RRRA	Roosevelt Roads Redevelopment Authority
RTAA	Reemployment Trade Adjustment Assistance
SCDD	State Council on Developmental Disabilities
SEMC	Support and Employment Modalities Centers
SEMO	Support and Employment Modalities Offices

SIFC	State Insurance Fund Corporation
SILC	State Independent Living Council
SME	Subject Matter Experts
SME's	Small and Medium-Sized Business
SMEs	Small and Medium Enterprises
SOEPP	State Office of Energy Public Policy
SRC	State Rehabilitation Council
SSA	Social Security Act
STEM	Science, Technology, Engineering and Mathematics
SWDB	State Workforce Development Board
TANF	Temporary Assistance for Needy Families
TC	Transition Counselor
TEGL	Training and Employment Guidance Letter
TEN	Training and Employment Notices
TRA	Trade Readjustment Allowances
U.S.	United States
UC	Unemployment Compensation
UCX	Unemployment Compensation for Ex-servicemembers
UI	Unemployment Insurance
UPR	University of Puerto Rico
USCIS	United States Citizenship and Immigration Services
USDA	United States Department of Agriculture
VIF	Variance Inflation Factor
VRC	Vocational Rehabilitation Counselors
VRCSC	Vocational Rehabilitation Counseling Service Centers Services
VRP	Vocational Rehabilitation Program
WBD	Workforce Development Board
WBLE	Work-Based Learning Experiences
WBO	Worker Benefit Orientation
WDP	Workforce Development Progrm
WDP	Workforce Development Program
WIA	Workforce Investment Act of 1998
WIOA	Workforce Innovation and Opportunity Act
WP	Wagner-Peyser Program

OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor (DOL) outlines a four-year strategy for the State's workforce development system. The publicly funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and support to help all jobseekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of federal investments in job training, integrate service delivery across programs, improve efficiency in service delivery, and ensure that the workforce system is job-driven and matches employers with skilled individuals. One of the WIOA's principal areas of reform is to require states to plan across core programs and include this planning process in Unified or Combined State Plans. This reform promotes a shared understanding of workforce needs within each state and fosters the development of more comprehensive and integrated approaches, such as career pathways and sector strategies, to address the needs of businesses and workers. The successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

(a) Unified or Combined State Plan.

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

Puerto Rico submits its Unified State Plan, which includes the following core programs:

1) Adult Program
2) DWP
3) Youth Program
4) Wagner-Peyser Act
5) Adult Education and Family Literacy Act
6) VRP, including Blind Services

This Unified Plan submitted under WIOA includes the integration of the Department of Economic and Commerce Development, DOL and Human Resources, Department of Education, VRP, and Blind Services.

(b) Plan Introduction or Executive Summary.

I. WIOA STATE PLAN TYPE & EXECUTIVE SUMMARY

The González-Colón administration is submitting its two-year modification of the WIOA Unified State Plan which provides a strategic roadmap designed to align Puerto Rico's human capital with its ambitious Reshoring goals.

This plan coordinates the following six core programs across three primary government agencies.

1. Adult Program (Title I)

- Administered by: Department of Economic Development and Commerce (DEDC).

2. Dislocated Worker Program (Title I)

- Administered by: Department of Economic Development and Commerce (DEDC).

3. Youth Program (Title I)

- Administered by: Department of Economic Development and Commerce (DEDC).

4. Adult Education and Family Literacy Act Program (Title II)

- Administered by: Department of Education (PRDE).

5. Wagner-Peyser Act Employment Service Program (Title III)

- Administered by: Department of Labor and Human Resources (DTRH).

6. Vocational Rehabilitation Program (Title IV)

- Administered by: Vocational Rehabilitation Administration (VRA/Department of Labor).

Executive Summary

The administration of Governor Jenniffer González-Colón, who took office in January 2025, has aligned Puerto Rico's economic and educational policies with "America's Talent Strategy: Building the Workforce for the Golden Age" framework. This federal strategy emphasizes high-growth industries and accountability and is built upon five strategic pillars designed to align the American workforce with the "America First" economic agenda.

The González-Colón administration, through the Puerto Rico Department of Economic Development and Commerce (DDEC) and the Puerto Rico Department of Labor and Human Resources (DOL HR) has localized these priorities to transform Puerto Rico into a competitive innovation hub.

These priorities align and compliment the five strategic pillars in the following ways:

1. Industry-Driven Strategies (Pillar I)

The federal strategy focuses on sector-specific training for industries like semiconductors, biopharma, and energy. The González-Colón administration has mirrored this by:

- Targeted Sector Growth: Directing Workforce Innovation and Opportunity Act (WIOA) funds toward advanced manufacturing, life sciences, aerospace, and digital industries.
- Registered Apprenticeship: Puerto Rico's Registered Apprenticeship Program (RAP) has undergone a profound structural transformation between 2024 and 2026. Historically a small, traditional initiative, it has been elevated by the González-Colón administration into the primary talent engine for the island's reshoring and reconstruction strategy.
- Energy Workforce Transition: Partnering with the U.S. Department of Energy to train workers for the island's transition to a resilient, decentralized power grid, aligning with federal goals for green energy infrastructure.
- Medical Technology: Leveraging Puerto Rico's existing biopharma base to create specialized training programs that support federal reshoring efforts.

2. Worker Mobility (Pillar II)

A core component of the "Golden Age" strategy is removing barriers for workers and ensuring work pays.

- Middle-Class Tax Reform: In early 2026, Governor González-Colón introduced a major tax reform aimed at reducing the burden on working families. By lowering income tax rates and doubling dependent deductions, the administration aims to incentivize workforce participation—a key goal of the national strategy.
- Infrastructure Investment: The administration secured over $100 million for port and pier modernization (e.g., Port of San Juan). These projects create high-paying maritime and logistics jobs, promoting upward mobility for the local workforce.

3. Integrated Systems (Pillar III)

The federal plan calls for streamlining duplicative programs. Governor González-Colón has made direct Federal engagement a hallmark of her term:

- PRFAA Leadership: Through the Puerto Rico Federal Affairs Administration (PRFAA), the administration has harmonized local labor initiatives with federal agencies (HHS, Energy, and Commerce) to ensure that federal grants for workforce development are deployed without the historic administrative delays.
- Healthcare Retention: The administration is aggressively lobbying for Medicare Advantage rate parity. This is a workforce issue: by securing fair reimbursement, the administration aims to stop the "brain drain" of healthcare professionals to the mainland, maintaining a robust local medical talent pool.

4. Accountability (Pillar IV)

The "Golden Age" strategy emphasizes credentials of value. The González-Colón administration has adopted this by:

- Vocational Alignment: Reforming local vocational and technical colleges to ensure curricula are co-developed with private-sector employers.
- Performance Measures: Implementing stricter reporting for programs funded by federal reconstruction dollars to ensure that training leads directly to long-term employment in the construction and engineering sectors.

5. Flexibility and Innovation (Pillar V)

The administration has integrated Artificial Intelligence (AI) as a foundational pillar of its "innovation hub" vision for Puerto Rico.

The administration’s strategy centers on the belief that a "Golden Age" workforce must be AI-literate to remain competitive and has implemented the following initiatives:

- AWS Technology Skills Partnership: In late 2025, Governor González-Colón signed a landmark agreement with Amazon Web Services (AWS) to provide free AI and cloud computing training to 50,000 residents. The program targets public school students, University of Puerto Rico (UPR) participants, and displaced workers to ensure a baseline of "AI literacy."
- AI Literacy Framework: Following the federal Department of Labor's 2026 AI Literacy Framework, the administration is integrating AI competencies into vocational training programs (WIOA-funded), shifting the focus from manual labor to AI-augmented technical roles in manufacturing and logistics.
- Reshoring Task Force: Through Executive Order 2025-012, the administration created a task force that uses AI data modeling to identify specific U.S. supply chain gaps. This allows the DDEC to proactively recruit biopharma and semiconductor firms by demonstrating exactly how Puerto Rico’s infrastructure can support their AI-driven production lines.

The Workforce Pell Grant is a critical pillar of Puerto Rico's reshoring initiative. It will help transform how the Commonwealth develops the specialized talent needed to attract and retain high-tech manufacturing—particularly in the pharmaceutical, medical device, and aerospace sectors.

By funding the "missing middle" of education—the short-term technical certifications—Workforce Pell provides the human capital infrastructure necessary for Puerto Rico to compete as a global manufacturing hub.

II. STRATEGIC ELEMENTS

(a) Puerto Rico Economic, Workforce, and Workforce Development Activities Analysis.

a) Economic and Workforce Analysis

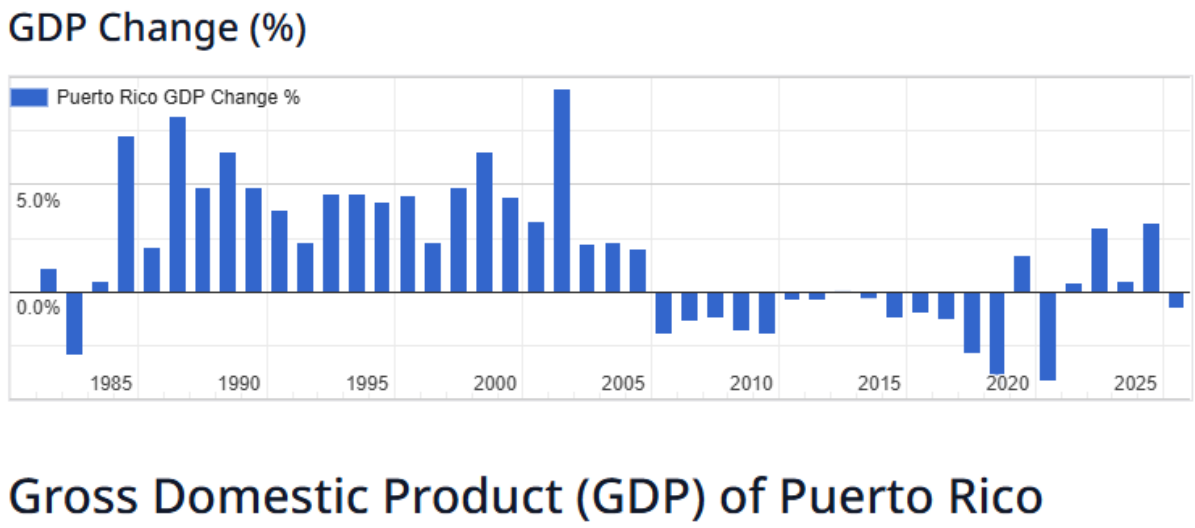
(A) *Economic Analysis*. The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State.

Economic Analysis

The current landscape of Puerto Rico's labor market reveals an economy in a state of sophisticated recalibration. Moving beyond the "recovery" phase of the early 2020s, the island is now engineering a transition toward a knowledge-based, export-oriented ecosystem.

GROSS DOMESTIC PRODUCT (GDP)

Puerto Rico's economy entered 2026 having achieved a fragile yet historic equilibrium. After years of post-disaster volatility, the Real Gross National Product (GNP) grew by 2.1 percent in Fiscal Year 2024, but slowed to an estimated 0.4 percent in Fiscal Yar 2025.



Puerto Rico's economic data indicates a period of stabilization and moderate growth, following the volatile recovery cycles of the early 2020s. As of early 2026, the economy is transitioning into a "softer" growth phase as federal pandemic-era liquidity tapers off.

Key GDP and GNP Figures

Economists in Puerto Rico often distinguish between Gross Domestic Product (GDP)—the total value of goods and services produced on the island—and Gross National Product (GNP), which better reflects the income that actually stays in the local economy.

- Gross Domestic Product (GDP): In Fiscal Year 2025, GDP reached approximately $129.37 billion, reflecting a nominal increase of 2.6% over the previous year.
- Gross National Product (GNP): Real GNP (adjusted for inflation) grew by 2.1percent in FY 2024, but slowed to an estimated 0.4% in FY 2025.

In Puerto Rico, exports are the primary engine of the Gross Domestic Product (GDP), fundamentally because the island operates as a high-intensity manufacturing hub within the U.S. customs system.

While most economies rely heavily on local consumption, Puerto Rico's GDP is uniquely "export-heavy," with total exports often representing over 50% of the island's total economic output.

The "Manufacturing Multiplier"

Manufacturing accounts for nearly 46–50 percent of Puerto Rico's GDP, and the vast majority of that production (approximately 74 percent) is destined for export.

- The Pharmaceutical Anchor: Pharmaceuticals alone contribute roughly 30% of the total GDP. In 2024 and 2025, pharmaceutical exports reached record levels, totaling over $48 billion.
- Value Addition: Because the island specializes in high-value-added goods (biotechnology, medical devices, and precision electronics), each dollar of export generates a significant ripple effect in specialized services, logistics, and high-wage technical employment.

The GDP vs. GNP Discrepancy

The impact of exports reveals a unique structural characteristic of the Puerto Rican economy: the gap between GDP and Gross National Product (GNP).

- Profit Outflows: Many of the largest exporters are multinational corporations. While the *production* (GDP) happens on the island, a significant portion of the *profits* is repatriated to parent companies off-island.

- The Result: This creates a situation where Puerto Rico's GDP ($129 billion) is nearly double its GNP ($70–85 billion). This gap is almost entirely driven by the net exports of the manufacturing sector.

Puerto Rico consistently maintains a positive trade surplus, which is a rare feat for an island economy. In 2025, exports climbed to $62.4 billion, creating a trade surplus of $7.4 billion (a 30 percent increase over 2024). When local consumption or government spending slows down, "Net Exports" (Exports minus Imports) often act as the primary stabilizer that prevents the economy from entering a recession. In 2024, for example, a robust improvement in foreign trade was a key factor in achieving the 2.1% real growth rate.

Strategic "Reshoring" Impact

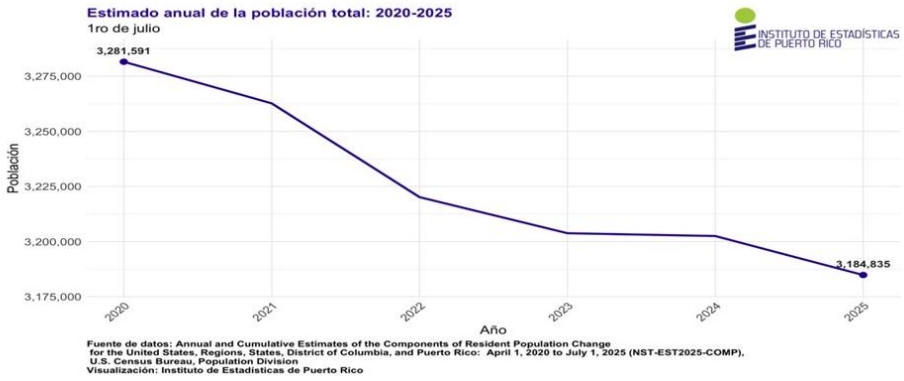
Under the current economic vision of Governor Jenniffer González-Colón, exports are being used as a tool for economic diplomacy. By positioning the island as a "safe haven" for U.S. supply chains (Reshoring), the government aims to increase the volume of exports to the U.S. mainland. This strategy is intended to replace expiring federal aid with permanent, private-sector production, ensuring that GDP growth is fueled by global demand for "*Made in Puerto Rico*" goods rather than temporary stimulus.

POPULATION

(include chart)

The relationship between Puerto Rico's population and its economic growth in 2026 is defined by a "Demographic Squeeze"—a simultaneous decline in total residents and an acceleration in the aging of the remaining population.

As of the latest 2026 data, the island's population has slipped below 3.2 million, a threshold not seen since the 1980s. This shift creates structural challenges for the GDP that go beyond simple "headcount" and strike at the core of labor productivity and fiscal sustainability.



The population decrease is no longer just a result of migration; it is now driven by a "Natural Decrease" where deaths significantly outpace births. In 2025–2026, Puerto Rico recorded approximately 18,000 births against 33,000 deaths. This "natural change" creates a structural deficit of 15,000 people annually, regardless of migration.

After a brief period of "net positive" migration in 2024, the island returned to negative territory in 2025. Younger, working-age adults (ages 20–44) remain the most likely to leave, primarily seeking higher wages and more stable infrastructure in the mainland U.S.

The exodus of the youth leaves behind an older population, which shifts the economic focus from "production" to "consumption and care." The civilian labor force is currently estimated at 1.24 million. With a median age of 46, Puerto Rico has one of the oldest workforces in the Western Hemisphere. This leads to a "Skills Mismatch" where emerging high-tech sectors (like Aerospace and IT) struggle to find enough local, entry-level talent.

The ratio of non-workers (elderly and children) to active workers is rising. For every 100 working-age people, there are now approximately 50 dependents, increasing the tax and social burden on the active workforce. A shrinking population naturally reduces the demand for local services, housing, and retail. This is one reason why, despite high export growth, Real GNP growth is projected to be nearly flat (0.4 percent) in 2026.

To counteract a shrinking population, the current economic vision (including Governor González-Colón's plan) focuses on increasing output per worker by investing in Artificial Intelligence (AI) and automated manufacturing to maintain high export volumes (Biopharma) with fewer total employees. The administration also plans on aggressively targeting the 55 percent of the population currently outside the formal labor market to boost the Labor Force Participation Rate (approximately 44 percent). Finally, the administration hopes to pivot toward "Export Services" where a single high-skilled remote worker can generate significantly more GDP than a traditional service-sector employee.

Governor Jenniffer González-Colón’s strategy to attract the Puerto Rican diaspora back to the island is built on the philosophy that "economic stability is the best repatriation policy." Rather than relying on a single "return home" program, her administration is implementing a multi-layered fiscal and industrial reform designed to make Puerto Rico a more viable long-term home for professionals and families currently living in the U.S. mainland.

The efforts can be categorized into three primary strategic pillars:

1. The "Middle-Class" Tax Reform (2025–2026)

The Governor’s most direct effort to address population challenges and attract Puerto Ricans back to Puerto Rico her $550 million Tax Reform plan, introduced in early 2026. The goal is to lower the cost of living and increase the "net take-home pay" for working families, addressing the primary reason people leave. The reform plans includes the following:

- Income Tax Reductions: The plan specifically targets individuals earning between $25,000 and $90,000, significantly lowering their tax burden to compete with mainland U.S. states.
- Doubling Dependent Deductions: The deduction for minors and dependents was increased from $2,500 to $5,000, a move explicitly designed to support young families who might otherwise migrate for better financial support.
- Simplified Compliance: Under the reform, the administration is consolidating employment tax reporting, making it easier for small business owners and self-employed professionals to operate legally on the island.

2. The "Reshoring" Job Engine

The Governor is betting that high-quality, high-paying jobs are the only sustainable way to bring people back. Her "Industrial Reshoring" initiative aims to turn Puerto Rico into a global hub for sectors that diaspora Puerto Ricans often work in while abroad. This will be accomplished through:

- WIOA Alignment: She is strategically directing federal workforce funds toward Aerospace, Digital Industries, and Life Sciences. The vision is to create a "tech corridor" where a Puerto Rican engineer in Florida or Texas can find an equivalent, high-paying role in Aguadilla or San Juan.
- Act 60 Modernization: By extending the Resident Investor and Export Services incentives (Act 60) through 2055, the administration is providing long-term certainty for service-based businesses (Consulting, Software, Legal), encouraging diaspora entrepreneurs to relocate their businesses to the island.

3. Improving "Quality of Life" Infrastructure

The Governor has emphasized that "it is not enough to have a job if the lights don't stay on." Her administration is focusing on the structural push factors that drive migration. Through the "IDEA" initiative, she is working to fast-track energy grid repairs and deregulate the permitting process. The goal is to reduce the operational costs and frustrations that often deter returning residents from starting businesses.

Under Law 43-2026, the administration is promoting Puerto Rico as an inclusive and accessible destination. This is part of a broader "Welcome Home" narrative aimed at families with diverse needs, ensuring they feel the island can provide for their health and social wellbeing.

EXISTING DEMAND INDUSTRY SECTORS & OCCUPATIONS

In Puerto Rico, existing demand is defined by sectors that are currently experiencing high job vacancy rates, significant payroll growth, or are critical to the island's ongoing structural recovery.

As of early 2026, the labor market has reached a 16-year high in nonfarm employment, primarily driven by four "anchor" industries.

Mean Total Employment, Seasonally Adjusted and Percentage Change;

Fiscal Year 2019-2026

Year	Total Employment	Change%
2019	995	2.7
2020	994	-0.1
2021	1039	4.5
2022	1115	7.3
2023	1116	0.1
2024	1233.6	9.5
2025	1232.9	-0.06
2026	1233.8	0.07

(include chart)

The following details the sectors and specific occupations where demand is currently most acute.

1. Healthcare and Social Assistance

This is the most consistent driver of labor demand due to Puerto Rico's rapidly aging demographic and the expansion of federal healthcare funding. The increased need for geriatric care and a brain drain of medical professionals to the U.S. mainland serves a primary driver for existing demand,

High-Demand Occupations in Healthcare include:

- Clinical: Registered Nurses (RNs), Licensed Practical Nurses (LPNs), Medical Technologists, and Physical Therapists.
- Support: Home Health Aides, Nursing Assistants, and Medical Assistants.
- Specialized: Pharmacy Technicians and Phlebotomists.

2. Construction and Infrastructure

Fueled by billions in federal recovery funds (CDBG-DR and FEMA), the construction sector is facing a critical labor shortage that is expected to last through the next decade. Grid modernization (LUMA/Genera PR), bridge and road repair, and a surge in private-sector solar installations serve as a primary driver for this industry.

High-Demand Occupations in Construction and Infrastructure include:

- Skilled Trades: Master Electricians (*Peritos Electricistas*), Plumbers, Carpenters, and Masonry Workers.
- Operational: Heavy Equipment Operators, Civil Engineers, and Project Managers.
- Specialized: Solar Photovoltaic Installers and Safety Inspectors (OSHA-certified).

3. Professional, Scientific, and Technical Services

This sector has seen a post-pandemic boom, particularly in services tailored for export under Act 60 incentives. Digital transformation of local businesses and the growth of remote-service hubs for global firms serve as the primary drivers for this industry.

High-Demand Occupations in Professional, Scientific, and Technical Services include:

- Information Technology: Cybersecurity Analysts, Software Developers (Java, Python), and Systems Architects.
- Business Operations: Accountants, Auditors, and Compliance Officers.
- Scientific: Quality Control Technicians and Lab Researchers (specifically for the Biopharma corridor).

4. Leisure, Hospitality, and Retail

Despite being lower-wage sectors, they account for the largest volume of job openings and have shown the most resilient growth in 2025. Record-breaking visitor arrivals and the "Bad Bunny effect" (large-scale event tourism) seen in late 2025 is the primary driver for this growth.

High-Demand Occupations in Leisure, Hospitality, and Retail include:

- Hospitality: Hotel Managers, Chefs/Head Cooks, and Multilingual Front Desk Agents.
- Retail: Retail Supervisors, Logistics Coordinators, and Customer Service Representatives.

While the island shares a macro-economic goal of "reshoring" and high-tech manufacturing, the specific industry and occupational demands vary significantly by the 15 local workforce development areas.

The following analysis breaks down the 15 local areas into four strategic clusters based on their dominant economic drivers.

1. The Metropolitan & North-Central Cluster

- Areas: San Juan, Bayamón-Comerío, Guaynabo-Toa Baja, Carolina, and North-Central (Arecibo). This cluster is the services and logistics engine of the island, concentrating nearly 60 percent of all non-farm employment.
- Existing Demand Industry Sectors: Professional & Technical Services, Finance, and Retail Trade.
- Existing Occupational Demand: Accountants, Auditors, Customer Service Supervisors, and Retail Managers.

2. The Western "Aerospace & STEM" Corridor

- Areas: Mayagüez-Las Marías and Aguadilla (Northwest). Known as the technical heart of Puerto Rico, this region leverages the University of Puerto Rico at Mayagüez (UPRM) to fuel high-tech industries.
- Existing Demand Industry Sectors: Aerospace Manufacturing, Maintenance, Repair and Overhaul (MRO), and Medical Device Manufacturing.
- Existing Occupational Demand: Aircraft Mechanics (A&P), Quality Control Technicians, and Industrial Engineers.

3. The Southern & South-Central "Reconstruction" Hub

- Areas: Ponce and Caguas-Guayama. This region is heavily involved in the energy transition and physical infrastructure rebuilding, often serving as the logistics gateway for the south.
- Existing Demand Industry Sectors: Construction, Healthcare, and Heavy Logistics.
- Existing Occupational Demand: Registered Nurses, Project Managers, and Truck Drivers (CDL).

4. The Eastern & Island Municipalities

- Areas: Northeast (Fajardo), East-Central, and the Island Municipalities (Vieques/Culebra). This region is primarily focused on the Blue Economy and tourism-adjacent development.
- Existing Demand Industry Sectors: Hospitality, Marine Services, and Tourism.
- Existing Occupational Demand: Chefs, Hotel Front-of-House, and Boat Technicians.

EMERGING DEMAND INDUSTRY SECTORS & OCCUPATIONS

As Puerto Rico moves through 2026, emerging demand is being shaped by a transition from traditional labor to a knowledge-driven, tech-enabled economy. While sectors like retail and

government remain large, the *growth* is concentrated in industries that require specialized technical expertise, digital fluency, and high-value exports.

The following is an analysis of the industries and occupations currently ascending in the Puerto Rican labor market.

1. Technology and Digital Infrastructure

This is the most aggressive growth sector, fueled by the "21st Century Techforce" initiative and the island's role as a digital service hub for the U.S. mainland (Act 60). The "AI Revolution," cloud migration for local businesses, and a surge in cybersecurity requirements for the pharmaceutical supply chain serve as the primary drivers.

Emerging Occupations in Technology and Digital Infrastructure include:

- Cybersecurity Analysts: Critical for protecting intellectual property in the Biopharma and Finance sectors.
- Cloud Architects & Developers: Specifically, those skilled in AWS, Azure, and Python/Java.
- Data Scientists & Machine Learning Engineers: Needed to optimize automated manufacturing processes.

2. Renewable Energy and "Green" Construction

The total transformation of the electrical grid (Act 17) has created a localized industrial boom that did not exist at this scale five years ago. Hurricane resilience mandates and the "LUMA/Genera PR" transition toward decentralized solar power serve as the primary drivers.

Emerging Occupations in Renewable Energy and "Green" Construction include:

- Solar Photovoltaic (PV) Installers: Massive demand for residential and utility-scale solar.
- Energy Efficiency Auditors: Specialists who consult businesses on lowering high electricity overhead.
- Battery Storage Technicians: Experts in industrial-grade lithium and flow-battery systems.

3. Aerospace and Advanced Aviation

Centered largely in the West LWDA (Aguadilla-Mayagüez), this sector is moving beyond maintenance into high-level design and satellite technology. Federal defense contracts and Puerto Rico’s strategic position as a low-cost, U.S.-regulated aerospace hub drive this demand.

Emerging Occupations in Aerospace and Advanced Aviation include:

- Aerospace Engineers: Designing systems for global aerospace firms.
- Unmanned Aerial System (UAS) Operators: Drone pilots for infrastructure inspection and agricultural monitoring.
- Avionics Technicians: Specialists in the electronic systems used on aircraft and satellites.

4. Creative Industries and "Blue" Tourism

Moving beyond traditional "sun and sand," Puerto Rico is emerging as a hub for the "Orange Economy" (creative services) and sustainable maritime activities. Global demand for Puerto Rican cultural content (music/film) and a policy shift toward high-spending "Eco-tourism" has impacted the emergence of this industry.

Emerging Occupations in Creative Industries and "Blue" Tourism include:

- Content Creators & Digital Strategists: Managing the global brands of local artists and firms.
- Eco-Tourism Guides: Specialists in biodiversity and sustainable maritime recreation.
- Film Production Technicians: Driven by the island's competitive tax credits for cinema and streaming productions.

Puerto Rico views emerging demand as a strategic shift toward a knowledge-based, multisectoral economy that is deeply integrated into global supply chains. Across the 15 Local Workforce Development Areas (LWDAs), this demand is no longer just about filling vacancies—it is about evolving the island's workforce to meet the technological and environmental requirements of 2026.

The 15 LWDAs translate these state goals into regional realities based on their local infrastructure and talent pipelines.

Regional Cluster	Emerging Industry Focus	Key Emerging Occupations
Northwestern Cluster (Aguadilla/Mayaguez)	Aerospace & BioTech Hub	Aerospace Engineers, Drone Pilots (FAA 107), Clinical Lab Researchers
Metro Hub (San Juan/Baymon,Carolina)	Knowledge Economy & Finance	Cybersecurity Analysts, Compliance Officers, AI Integration Specialists
Southern Hub (Ponce/Guayama)	Energy & Logistics Gateway	Solar PV Installers, Battery Storage Technicians, Smart-Grid Operators

Central/Rural (Caguas/Humacao)	Agro-Tech & Specialized Manufacturing	Hydroponic Technicians, CNC Operators, Food Safety Scientists

EMPLOYERS' EMPLOYMENT NEEDS

As Puerto Rico advances through 2026, the employment needs of local employers are characterized by a move toward technical specialization and soft skill resilience. As articulated in our 2024–2027 WIOA Unified State Plan, there is a significant skills mismatch where employers find that while candidates may have degrees, they often lack the specific industry-recognized credentials or behavioral competencies required for the modern workplace.

The following is an assessment of the core requirements across the island's economic landscape.

1. Universal "Foundation" Skills (Cross-Sector)

Regardless of the industry, Puerto Rican employers consistently rank the following three areas as their top "baseline" needs:

- Bilingual Proficiency: Mastery of both Spanish and English is no longer a "plus"—it is a mechanical requirement for any role involving global supply chains (Pharma/Aerospace), tech exports (Act 60), or high-end tourism.
- Digital Fluency: This includes the ability to navigate cloud-based project management tools (Teams, Slack), advanced data handling (Excel/Tableau), and an increasing expectation of AI Literacy (using generative AI to optimize routine tasks).
- The "Human Layer" (Soft Skills): Employers emphasize a critical shortage in Punctuality/Accountability, Critical Thinking, and the ability to work under high pressure without direct supervision.

2. Assessment by Sector: Knowledge, Skills, and Abilities (KSA)s & Credentials

Sector	KSAs	Credentials/Licenses
Biopharma & Medical Devices	Deep understanding of GMP (Good Manufacturing Practices), FDA regulations, and Lean Six Sigma methodologies	Six Sigma Green/Black Belt certifications. CEIV Pharma (for logistics roles).

	High-precision laboratory techniques, statistical process control, and cleanroom protocols.	Professional Engineer (PE) license for advanced manufacturing roles.
Aerospace & Aviation	Structural mechanics, avionics systems, and federal aviation regulations. Troubleshooting complex electronic systems and precision machining (CNC)	FAA Airframe & Powerplant (A&P) license (critical for MRO roles). FAA Part 107 (Drone Pilot License) for infrastructure and agricultural monitoring. AS9100 Quality Management standards.
Renewable Energy & Construction	National Electric Code (NEC), specifically Article 690 for solar, and smart-grid integration Installation of Photovoltaic (PV) systems, battery storage management, and high-angle safety rescue	NABCEP Certification (North American Board of Certified Energy Practitioners) Master Electrician (*Perito*) license (State Board of Puerto Rico) OSHA 30 (Construction Safety and Health) (AWS Solutions Architect, Google Professional Cloud Architect).
Information Technology & Cybersecurity	Network security protocols, cloud architecture (AWS/Azure), and data privacy laws Programming in Python, R, or SQL; threat detection; and machine learning application	CompTIA Security+ or CISSP (Certified Information Systems Security Professional). Cloud Provider Certifications (AWS Solutions Architect, Google Professional Cloud Architect)

Sector	KSAs	Credentials/Licenses
Biopharma & Medical Devices	Deep understanding of GMP (Good Manufacturing Practices), FDA regulations, and Lean Six Sigma methodologies High-precision laboratory techniques, statistical process control, and cleanroom protocols.	Six Sigma Green/Black Belt certifications. CEIV Pharma (for logistics roles). Professional Engineer (PE) license for advanced manufacturing roles.
Aerospace & Aviation	Structural mechanics, avionics systems, and federal aviation regulations. Troubleshooting complex electronic systems and precision machining (CNC)	FAA Airframe & Powerplant (A&P) license (critical for MRO roles). FAA Part 107 (Drone Pilot License) for infrastructure and agricultural monitoring. AS9100 Quality Management standards.
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Information Technology & Cybersecurity	Network security protocols, cloud	CompTIA Security+ or CISSP (Certified Information

	architecture (AWS/Azure), and data privacy laws	Systems Security Professional).
	Programming in Python, R, or SQL; threat detection; and machine learning application	Cloud Provider Certifications (AWS Solutions Architect, Google Professional Cloud Architect)

3. The Impact of Universal License Recognition (Law 102-2025)

A major shift in 2026 is the implementation of the Universal Recognition of Occupational and Professional Licenses Act.

- Mobility: Professionals from the U.S. mainland (diaspora) can now obtain equivalent licenses in Puerto Rico within 30 days, provided they have practiced for at least three consecutive years.
- Provisional Access: If a board fails to act within the 30-day window, a provisional license is automatically granted, allowing the worker to enter the labor force immediately while final review concludes.

(B) *Workforce Analysis*. A 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 and disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)–(iii) below. The populations analyzed must include individuals with barriers to employment, as described in the first paragraph of Section II. Analysis must include—

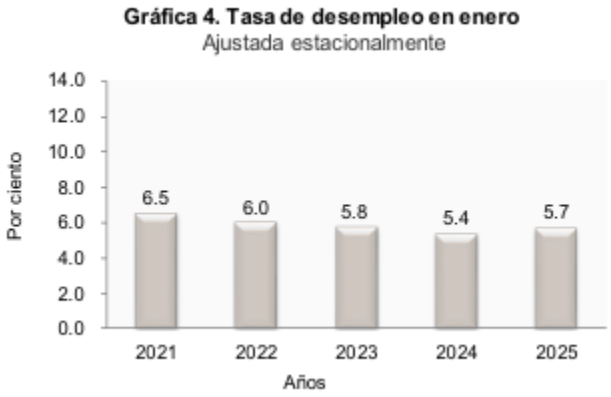
(i) Employment and Unemployment. It provides an analysis of current employment and unemployment data, including labor force participation rates and trends in the State.

Workforce Analysis

Puerto Rico's current labor market is characterized by a "High-Employment, Low-Participation" paradox. While the island has reached its highest level of nonfarm employment in over 15 years, it continues to grapple with one of the lowest labor force participation rates in the world, largely driven by a rapidly aging population and a significant informal economy.

The following is an analysis of the current data and key trends:

Unemployment Trends: Historic Lows (include chart)



The unemployment rate in Puerto Rico has remained remarkably stable and low compared to historical averages (which were often in the double digits). As of early 2026, the unemployment rate is approximately 5.7 percent (seasonally adjusted). This is slightly higher than the record low of 5.5 percent seen in mid-2025 but remains significantly lower than the 13.5 percent long-term average for the island. This low rate suggests that nearly everyone actively seeking work is finding it. However, because the rate only counts those *actively looking*, it masks the large segment of the population that is not in the labor force at all.

Employment and Nonfarm Payrolls

Total nonfarm employment reached a 16-year high in 2025 and has maintained that momentum into 2026 at approximately 969,000 (preliminary data for Q1 2026). The growth drivers are Leisure & Hospitality, which is the fastest-growing sector, adding roughly 3,900 jobs year-over-year, fueled by record-breaking tourism. Education & Health Services added 2.1 percent more jobs in early 2026, driven by the aging demographic's need for care. While growth slowed to 0.3 percent in early 2026 after a massive 2024-2025 surge, Construction remains a pillar of employment due to ongoing grid reconstruction. Manufacturing (the island's largest GDP contributor) and Professional Services have seen slight contractions (approx. -0.7

percent and -2.4 percent respectively), as firms consolidate after a period of rapid post-pandemic expansion.

(ii) Labor Market Trends. It provides an analysis of key labor market trends, including those across existing industries and occupations.

Labor Force Participation: The Structural Challenge

The most critical metric for Puerto Rico is the Labor Force Participation Rate (LFPR), which tracks the percentage of the adult population that is either working or looking for work. The current rate is estimated at 45.4 percent. This rate has been climbing very slowly from its 2021 low of 39.5 percent, but it remains well below the U.S. mainland average of 62 percent.

The low LFPR is attributed to aging demographics, where the median age in Puerto Rico is now 46, significantly higher than the U.S. average. As more people enter retirement age, the participation rate naturally drops. In addition, a significant portion of economic activity on the island occurs "off the books," particularly in construction and service trades. The brain Drain of younger, working-age professionals to the U.S. mainland also leaves behind a population with a higher dependency ratio.

The labor market is expected to remain tight throughout 2026. The Governor's current policies—including Tax Reform to increase take-home pay and Childcare Subsidies—are specifically designed to pull people from the "inactive" category into the formal labor force. Success in the future will be measured not by lowering unemployment further, but by whether the participation rate can break past the 46 percent ceiling.

The 15 LWDAs in Puerto Rico reflect a labor market that is tight yet geographically divided. While the island-wide unemployment rate sits at a historic low of 5.7 percent, the economic reality shifts significantly as you move from the industrial corridors of the north to the reconstruction zones of the south.

The following trends across the primary LWDA clusters reflects the following:

The Metropolitan Cluster: San Juan, Bayamón, Carolina

This region is the island's primary economic engine, but it is currently experiencing a "job churn" as white-collar industries consolidate. The unemployment trend is historically the lowest on the island, hovering between 4.3 percent and 4.8 percent. San Juan alone accounts for over 26 percent of total island employment. However, recent data from late 2025 showed a slight decline in total positions (-1.9 percent) as financial and professional services shifted toward automation and leaner staffing models.

A high concentration of Act 60 export service firms is driving a demand for high-skill, remote-capable workers, even as traditional retail employment in the metro area remains flat.

The Northwestern Cluster: Aguadilla and Mayagüez

This area, often referred to as the "STEM Corridor," is seeing the most aggressive private-sector hiring growth due to the aerospace and biopharma industries. The unemployment trend is slightly higher than the metro average at 6.8 percent, but this is down from double digits a decade ago. This region leads the island in hiring expectations, with nearly 18 percent of employers planning to expand their workforce in 2026. The presence of the Lufthansa Technik MRO and medical device clusters makes this the top region for technical "work-based learning" and apprenticeship demand.

The Southern & South-Central Cluster: Ponce and Guayama

This region is the current focal point for Puerto Rico’s infrastructure and energy "reconstruction" narrative. Unemployment remains stubbornly higher, ranging from 8.1 percent in Ponce to 8.6 percent in Guayama. Despite the higher unemployment, this region has the strongest hiring outlook for 2026 (approximately 33 percent), specifically in the energy and construction sectors.

As the headquarters for many grid modernization projects (LUMA/Genera PR), this area is seeing a surge in demand for skilled trades (electricians, installers) that currently outpaces the available local talent pool.

The North-Central & Eastern Cluster: Arecibo, Humacao, Fajardo

These areas are transitioning from traditional manufacturing and agriculture toward a "Blue Economy" and specialized bio-manufacturing. Unemployment is relatively stable at approximately

5.6 percent to 6.0 percent. Employment is bolstered by the "Bioscience Corridor" in Arecibo and the "Blue Tourism" initiatives in the East (Fajardo/Vieques).

There is a significant trend of "Seasonal Volatility" in the East, where employment spikes during the winter tourism peak but contracts significantly in the late summer month

The landscape of Puerto Rico's workforce is defined by a striking educational paradox. On one hand, the island stands as a global titan in producing high-tier STEM talent; on the other, it faces a structural "hollow middle" where the technical and vocational skills required for day-to-day industrial operations are in critically short supply.

Puerto Rico is currently one of the most educated jurisdictions in the region, particularly in the fields of science and engineering. This is driven by a university system that produces nearly 21,000 STEM graduates annually, accounting for roughly 50 percent of all degrees awarded on the island. This concentration of talent has allowed Puerto Rico to rank 39th globally in the 2025 IMD World Talent Ranking, outperforming major economies like Japan in terms of workforce readiness and the availability of specialized scientists. The University of Puerto Rico at Mayagüez remains the primary engine for this prestige, continuing its streak as the top producer of Hispanic engineers for the U.S. space and defense sectors.

Despite this elite output, a significant disconnect exists between classroom credentials and market needs. While 30 percent of the workforce holds a bachelor's degree or higher, the fastest-growing sectors—Construction, Renewable Energy, and specialized Biopharma—require middle-skills. These are roles that demand more than a high school diploma but less than a four-year degree, such as specialized certifications or associate degrees.

Currently, 56 percent of the jobs on the island fall into this middle-skill category, yet only 52 percent of the workforce possesses the necessary technical training to fill them. This 4 percent gap represents thousands of high-paying vacancies in solar installation, aircraft maintenance, and medical technology that remain unfilled because the labor force is over-educated in general theory but under-certified in specific technical applications.

The definition of a skilled worker in Puerto Rico has evolved. Employers across the 15 LWDAs are no longer just looking for degrees; they are seeking "Human-Tech Hybrids." This profile requires three distinct layers of ability:

- Bilingual Mastery: English and Spanish proficiency is now treated as a technical requirement for the island's export-led economy.
- Digital Fluency: Workers are expected to integrate AI-assisted tools and cloud-based data analytics into traditional roles, whether in a pharmacy lab or on a construction site.
- Resilient Soft Skills: Paradoxically, the rarest skills in the 2026 market are the most fundamental: critical thinking, punctuality, and the ability to work without constant supervision.

To solve this mismatch, the administration has pivoted toward Universal License Recognition (Law 102-2025). By allowing professionals from the diaspora to transfer their credentials in as little as 30 days, the government is attempting to import the missing middle-skills while local vocational programs catch up. The goal is to transform the workforce from a lopsided pyramid—heavy at the top with engineers and at the bottom with retail workers—into a balanced diamond, where a robust technical class powers the island's industrial resurgence.

To meet the hiring, education, and skill needs of Puerto Rico' economy, policymakers and industry leaders are focusing on the "Execution Gap"—the space between the island's elite academic assets and the practical, technical needs of its industrial recovery.

While Puerto Rico possesses world-class assets in STEM and a stabilizing labor market, significant areas of opportunity exist to better align these assets with the demands of the current $129 billion economy.

The most significant area of opportunity lies in the missing middle. Currently, 56 percent of jobs require more than a high school diploma but less than a bachelor's degree, yet the workforce is polarized between those with four-year degrees and those without specialized training. A key asset is the vast network of 80+ accredited universities and a high volume of general education graduates. By expanding Registered Apprenticeship Programs (RAPs) and stackable micro-

credentials and by shifting the focus from general theory to industry-recognized certifications (e.g., NABCEP for solar, FAA Part 107 for drones), the island can rapidly fill the four percent gap in middle-skill labor without requiring four-year commitments.

There is a massive opportunity to decentralize workforce development to match regional asset clusters. Examples include the Northwestern Bio-Manufacturing Cluster (Aguadilla/Mayagüez) and the Metropolitan Finance Hub (San Juan). By implementing a Sector Strategies approach, the Western part of the island can focus exclusively on Advanced Aviation Avionics, while the South prioritizes Smart-Grid Management. This prevents training for unemployment by ensuring that education is geographically linked to local hiring demand.

A critical asset is the thousands of skilled workers (electricians, builders, mechanics) currently operating in the informal economy who are not captured in official Labor Force Participation data. Currently, there exists a highly capable, hands-on workforce that is already performing essential services. By creating streamlined pathways for informal workers to "test out" of training requirements and earn formal licenses and by formalizing this talent pool, the island can increase its Labor Participation Rate and provide these workers with the legal protections and higher wages associated with the formal sector.

The Governor's vision and Act 60 incentives have turned Puerto Rico into a competitive destination for knowledge exports. A key asset is a bilingual, U.S.-educated workforce with a cost-of-living advantage compared to major U.S. tech hubs. Training the local workforce in Export Services (Software Development, Digital Compliance, and Creative Content) will allow Puerto Ricans to earn global wages while staying on the island, effectively reversing the Brain Drain by making the island a primary hub for the U.S. service supply chain.

(iii) Workforce education and skill levels provide an analysis of a workforce's educational and skill levels.

A. EDUCATION AND SKILLS OF WORKERS

In the labor field, employers have demands for the talent, knowledge, skills, abilities, and abilities that employees must possess. These demands or requirements are harmonized with technical knowledge or some level of education. The following are some requirements that employers demand when evaluating potential candidates.

1) Commitment to the Company.
2) Communication skills.
3) Math skills.
4) Thinking skills.
5) Language skills (e.g., Spanish and English).
6) Computer skills.
7) Meet itineraries.
8) Working under time pressure.
9) Work without direct supervision.
10) Handle employment-related emergencies.
11) Working outside regular hours.

The basic skills sought by employers are as follows (DOL 2021):

1) Punctuality and accountability.
2) Ability to follow instructions.
3) Communication skills (oral and written).
4) Ability to work on a team.
5) Ability to provide customer service.
6) Ability to learn.
7) Ability to identify and solve problems.
8) Ability to anticipate and avoid problems.
9) Self-Motivation and Self-Initiative.
10) Ability to work under pressure.

Employers establish the academic or technical qualifications that employees must have or be willing to acquire. Some jobs with these characteristics are as follows (DOL, 2021):

I. Occupations with an associate degree or Post-secondary Degree without a degree are as follows:
   1) Heavy Truck and Cargo Drivers
   2) Licensed Practical and Vocational Nurses
   3) Preschool Teachers, Except Special Education
   4) Hairdressers, Hair Stylists and Cosmetologists

II. Occupations with Baccalaureate Degree
   1) Accountants and auditors
   2) Elementary School Teachers, Except Special Education
   3) Market Research Analyst and Marketing Specialists
   4) Management and Operations Managers
   5) Medical and Clinical Laboratory Technologists

III. Occupations with Professional Degree, Doctorate, or Master's Degree
   1) Pharmacists
   2) Lawyers
   3) Medical Nurses
   4) Postsecondary Health Specialty Teachers
   5) Health Care Social Workers

These occupations change according to labor market trends and the opportunities and needs of employers as well as the manner and types of jobs available.

For 2021, the educational level in Puerto Rico by age was distributed as follows:

Item	Total	Percent %
Population	3,263,584	
Population 18 to 24 years	314,885	9.6%
High School graduate or higher	258,028	81.9%
Bachelor's degree or higher	30,938	9.8%

Population 25 to 34 years	419,212	12.8%
High School graduate or higher	386,366	92.2%
Bachelor's degree or higher	142,487	34.0%
Population 35 to 44 years	403,558	12.4%
High School graduate or higher	355,278	88.0%
Bachelor's degree or higher	133,685	33.1%
Population 45 to 64 years	872,417	26.7%
High School graduate or higher	722,040	82.8%
Bachelor's degree or higher	254,072	29.1%
Population 65 years and over	703,925	21.6%
High School graduate or higher	416,268	59.1%
Bachelor's degree or higher	127,866	18.2%

Source: Educational Attainment: Census Bureau 2021: American Community Survey of the US Census Bureau (ACS) DTE 5 – Year Estimates Subject Tables

The percentages of the age groups in the table are related to the total population, whereas the percentages of the two components are related to the corresponding age group. The group with the highest educational level in relation to the population is the group aged 45 to 64 years with a participation of 26.7% of the total population, followed by the group aged 65 years or more with 21.6% in relation to the population. This shows that the

population with the highest level of education was people aged 45 years and over. In addition, the components of "high school graduates" (which includes participants with university credits or associate degrees), and those of "bachelor's degrees or more" continue to be the most relevant for the groups of 45 years or more in consolidated terms. For the "Baccalaureate Degree or more" component, the 25–34 and 35–44 age groups were older than those in the 65 and older age groups.

The job market in Puerto Rico is highly competitive due to a significant portion of the workforce holding university credits, bachelor's degrees, or higher qualifications. The distribution of university studies across different age groups is provided below:"

Item	Total	Percent %
Population 25 to 39 years	208,630	
Science and Engineering	61,216	29.3%
Science and engineering related fields	33,440	16.0%
Business	53,793	25.8%
Education	24,972	12.0%
Arts, Humanities and Others	35,209	16.9%
Population 40 to 64 years	321,614	
Science and Engineering	81,440	25.3%
Science and engineering related fields	36,193	11.3%
Business	107,455	33.4%
Education	55,526	17.3%
Arts, Humanities and Others	41,000	12.7%

Population 65 years and over	127,866	
Science and Engineering	31,570	24.7%
Science and engineering related fields	10,557	8.3%
Business	30,969	24.2%
Education	39,081	30.6%
Arts, Humanities and Others	15,689	12.3%

Source: Field of bachelor's degree for First Major: Census Bureau 2021: DTE 5 – Year Estimates Subject Tables

According to the data presented, the group with the best academic preparation is the group aged 40 to 64 years, which is the concentration in business. This concentration is related to an increase in business creation and establishments.

B. LACK OF SKILLS

In the face of technological advances, the effects of globalization, the way of doing business, climate change, the way of interacting with others, and the way of working in groups are all situations and challenges employers face today. In the future, it is expected that they will have them in the same manner. Many of them have experienced that many candidates and employees do not meet or have the basic or necessary skills to adjust to changes and handle situations. Some of the lack of skills or abilities that the employer faces and is difficult to recruit are as follows (DOL, 2021):

1) **Critical Thinking**: This is a rational process that involves reflection and favors problem-solving. This requires the analysis, comparison, interpretation, and evaluation of information. It encompasses three phases: A) Definition of the problem, (B) Planning and research, and C) Evaluation of results or findings.

2) Creative Thinking: This is the starting point for innovation. This involves the ability to use knowledge gained to create original solutions.
3) Information Management: Information management includes the ability to do the following:
    a. Finding and accessing data in a digital environment.
    b. Analyze and select information, applying reliability and validity criteria.
    c. Classify information and organize it.
    d. Integrating information to generate innovative ideas.
4) Communication: In a digital environment, it is essential to develop skills that enable exchange and collaboration. To be effective, they must target a specific audience with a predetermined goal.
5) Collaboration: The ability to work collaboratively is closely related to the ability to work as a team. The digital environment favors: a) collaborative work, (b) co-responsibility, (c) interdependence, and (d) group decision-making.
6) Use of Technology – This includes the use of hardware equipment, computer programs, web browsing, and peripherals to perform tasks. The skill includes:
    a. The use of devices and operating systems
    b. Application of basic computer security standards
    c. Troubleshooting hardware, software, and networking issues
    d. Mastery of basic programs
    e. Knowledge and use of internet communication tools

These variable work skills will be benchmarks for employers to include the necessary training to keep their employees competitive, productive, and motivated.

(iv) Comparison of economic and workforce analytical conclusions. 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.

There is a massive opportunity to decentralize workforce development to match regional asset clusters. Examples include the Northwestern Bio-Manufacturing Cluster (Aguadilla/Mayagüez)

and the Metropolitan Finance Hub (San Juan). By implementing a Sector Strategies approach, the Western part of the island can focus exclusively on Advanced Aviation Avionics, while the South prioritizes Smart-Grid Management. This prevents training for unemployment by ensuring that education is geographically linked to local hiring demand.

A critical asset is the thousands of skilled workers (electricians, builders, mechanics) currently operating in the informal economy who are not captured in official Labor Force Participation data. Currently, there exists a highly capable, hands-on workforce that is already performing essential services. By creating streamlined pathways for informal workers to "test out" of training requirements and earn formal licenses and by formalizing this talent pool, the island can increase its Labor Participation Rate and provide these workers with the legal protections and higher wages associated with the formal sector.

The Governor's vision and Act 60 incentives have turned Puerto Rico into a competitive destination for knowledge exports. A key asset is a bilingual, U.S.-educated workforce with a cost-of-living advantage compared to major U.S. tech hubs. Training the local workforce in Export Services (Software Development, Digital Compliance, and Creative Content) will allow Puerto Ricans to earn global wages while staying on the island, effectively reversing the Brain Drain by making the island a primary hub for the U.S. service supply chain.

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

This must include an analysis of—

(A) *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[1] and optional one-stop delivery system partners.[2]

While the González-Colón administration continues to develop its mission, initiatives, and strategy, they are committed to transforming Puerto Rico's workforce development system from a collection of independent programs into a highly integrated "One-Stop" ecosystem. The analysis of the following proposed initiatives and activities reveals a strategic focus on interoperability, sector-based training, and rapid credentialing to meet the island's economic demand:

1. Core Program Education & Training Activities

The administration prioritizes training that leads directly to industry-recognized credentials, moving away from generalized education toward high-demand technical mastery.

- Title I: Adult, Dislocated Worker, and Youth (DEDC):
    - Activities: Heavy shift toward Registered Apprenticeships (RA) and Work-Based Learning (WBL). For 2026, the DEDC has launched "Pre-Apprenticeship" tracks in six new sectors, including Renewable Energy and Cybersecurity.
    - Focus: Utilizing "Individual Training Accounts" (ITAs) to fund short-term, stackable credentials (e.g., CNC Machining, Solar PV Installation) rather than traditional multi-year degrees.
- Title II: Adult Education and Family Literacy (PRDE):
    - Activities: Implementation of Integrated Education and Training (IET) models. This allows participants to learn foundational literacy and English *concurrently* with technical skills for a specific job (e.g., learning "Medical English" while training as a Pharmacy Tech).

[1] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and
Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.
[2] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

- Focus: Accelerating the transition to post-secondary education through "Career Pathways" aligned with the 15 Local Areas.

- Title III: Wagner-Peyser Employment Services (DTRH):
  - Activities: Transition to a "Virtual One-Stop" model using the Puerto Rico Integrated System (PRIS). This uses AI-driven matching to connect job seekers' existing skills with open positions in the Biopharma and Aerospace corridors.

- Title IV: Vocational Rehabilitation (VRA):
  - Activities: Aggressive expansion of Pre-Employment Transition Services (Pre-ETS) for students with disabilities.
  - Focus: Leveraging "On-the-Job Training" (OJT) contracts where the government subsidizes initial wages to encourage private-sector hiring of diverse talent.

(B) *Strengths and Weaknesses of Workforce Development Activities*. Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A).

Strategic Strengths & System Capacity

The State Workforce Development Board is currently focused on the following

- Data Interoperability: A major achievement this the integration of management systems across Titles I, II, and IV. This allows for Co-Enrollment, where a single participant can receive literacy support (Title II), technical training (Title I), and disability accommodations (Title IV) simultaneously without redundant paperwork.
- Sector Partnerships: The State Board has established formal "Industry Sector Partnerships" where employers (not just educators) design the curriculum for the island's training providers.
- Performance Monitoring: Moving from "descriptive" data to predictive analytics, allowing LWDAs to anticipate labor shortages in specific municipalities up to six months in advance.

Puerto Rico reflects a workforce system in a state of high-velocity transition. The following analysis evaluates the structural strengths that power this new "Reshoring" economy and the persistent weaknesses that the administration is working to mitigate.

Strategic Strengths

A primary strength is the unprecedented alignment between economic policy (Act 60, Reshoring) and human capital development.

- Integrated Data Ecosystem (PRIS): A major technological victory is the full interoperability of the *Puerto Rico Integrated System*. By linking Titles I, II, III, and IV, the island has eliminated siloed data, allowing for Co-Enrollment. This means a single participant can be tracked across multiple programs—receiving English literacy, vocational training, and disability support simultaneously without redundant intake processes.
- STEM Pipeline Assets: Puerto Rico remains a global leader in STEM readiness, ranking 39th in the IMD World Talent Ranking. The ability to produce 21,000 STEM graduates annually is a top-tier asset that provides the "anchor" for high-value exports in Biopharma and Aerospace.
- Sector-Based Agile Training: The shift toward Registered Apprenticeships (RA) and Work-Based Training allows the system to respond to market shifts faster than traditional universities. By involving employers directly in curriculum design, the LWDAs ensure that training leads to specific, high-demand licenses (FAA, NABCEP, OSHA) rather than general degrees.
- Universal License Recognition: Law 102-2025 has turned a former bureaucratic weakness into a strength by making it easier for the diaspora to return. This reciprocity provides an immediate influx of ready-to-work professionals in critical trades.

Structural Weaknesses

Despite the technological and policy gains, several friction points continue to challenge the system’s overall effectiveness.

- The "Hollow Middle" Skill Gap: While the island excels at producing engineers (high-skill) and retail workers (foundational-skill), it still faces a 4 percent deficit in middle-skill technicians. The existing labor force is often over-educated in theory but under-certified in the specific technical applications required for modern smart-grids and advanced manufacturing.
- Chronic Low Participation: While the unemployment rate is at a historic low, the Labor Force Participation Rate remains one of the lowest globally. This reflects a persistent disconnect where a large segment of the population remains outside the formal economy due to the informal sector allure or high dependency ratios in an aging population.
- The Skills Mismatch in Soft Skills: Employers consistently report that while technical KSAs (Knowledge, Skills, and Abilities) are improving, there is a systemic weakness in workplace readiness. Issues with punctuality, critical thinking, and bilingual professional communication are frequently cited as the primary reasons for early-career turnover.
- Regional Inequality: There is a notable "metropolitan gravity" where resources and high-paying knowledge export jobs (Act 60) are concentrated in the San Juan area. Rural LWDAs struggle with Brain Drain, as their best-trained workers migrate to the Metro area or the U.S. mainland for higher wages and more stable infrastructure.
- The Federal Cliff: A primary concern is the gradual reduction of federal stimulus and disaster recovery funds, which have artificially buoyed the economy since 2018.
- Energy Costs: High electricity costs and grid instability remain the most significant tax on local businesses, leading to a decline in electricity generation as more industrial and residential users shift to off-grid solar.
- Inventory Shifts: While exports remain strong, a decrease in private inventory investment suggests businesses are becoming more cautious with their stockpiles as interest rates remain elevated.

(b) 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 employers' needs to support economic growth and economic self-sufficiency. This must include –

(1) Vision. Describe the State's strategic vision of its workforce development system.

State Strategic Vision & Goals

The economic and workforce vision of Governor Jenniffer González-Colón is a strategic pivot toward industrial self-sufficiency, fiscal modernization, and the aggressive "reshoring" of American manufacturing. Stepping into 2025 and moving through 2026, this administration has moved away from the reactive posture of the post-Maria era, replacing it with a proactive "Puerto Rico First" agenda that frames the island as a critical asset for U.S. national and economic security.

The Pillar of Industrial Reshoring

At the heart of the Governor's vision is the conviction that Puerto Rico should serve as the primary alternative to foreign manufacturing hubs. By leveraging the "*Made in Puerto Rico is Made in the USA*" initiative, this administration is actively courting pharmaceutical and medical device giants to repatriate operations from China and India. This is supported by a sweeping deregulation agenda—the "IDEA" initiative—designed to dismantle the bureaucratic bottlenecks in the permitting process that have historically stifled capital investment. The goal is to transform the island into a frictionless environment for high-tech production.

A Market-Driven Workforce Evolution

To fuel this industrial engine, the Governor's workforce policy has shifted from general education toward specialized, demand-driven training. Under her guidance, WIOA funds and state resources are being funneled into Reshoring Workforce Training Funds. This strategy prioritizes short-term, high-impact certifications in advanced manufacturing, aerospace, and cybersecurity over traditional four-year degrees.

Central to this human capital strategy is the elevation of bilingualism as a strategic competitive advantage. The administration views a dual-language workforce not just as a cultural trait, but as a professional prerequisite for Puerto Rico to dominate the global export services market

(Act 60). Furthermore, her vision for "Educational Decentralization" aims to break the centralized Department of Education, giving local regions the autonomy to tailor their curricula to the specific industrial needs of their municipalities, such as AgTech in the south or Aerospace in the west.

Fiscal Relief and Labor Participation

Recognizing that a low Labor Force Participation Rate is the island's silent crisis, Governor González-Colón's vision includes a significant Fiscal Reform aimed at the middle class. By doubling dependent deductions and lowering individual income tax rates, the policy seeks to make formal employment more financially attractive than the informal economy. This is paired with "The Able Account" initiatives and enhanced childcare support, designed to remove the structural barriers that keep nearly 55 percent of the working-age population on the sidelines.

The Energy and Infrastructure Foundation

Finally, the Governor acknowledges that no workforce or industrial plan can succeed without a stable foundation. Her vision treats the energy grid as a national security priority. By maintaining an emergency declaration for the electrical system and fast-tracking baseload generation projects, she aims to lower the "cost of doing business" to competitive levels.

In summary, the González-Colón administration is attempting to engineer a virtuous cycle: lowering the cost of living through tax cuts and stable energy to retain talent, while simultaneously streamlining the business environment to attract the very industries that will employ that talent. It is a vision of Puerto Rico as a high-tech, bilingual, and fiscally lean jurisdiction that serves as the "Silicon Island" of the Caribbean.

Appendix 1: Performance Goals for the Core Programs

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

Include the state's expected levels of performance related to the performance accountability indicators based on the primary indicators of performance described in Section 116(b)(2)(A) of the WIOA.

Under section 116(b)(2)(A) of the WIOA, there are six primary performance indicators for its core programs. Performance measures were calculated using the following methodology:

- Rate of Employment in the 2nd Quarter Post-Exit: This metric assesses the proportion of individuals who secured non-subsidized jobs in the second quarter following their departure from the program. For young participants, this measure also included those engaged in educational or vocational training within the same time limit.
- Rate of Employment in the 4th Quarter Post-Exit: This indicator assesses the proportion of individuals who have found non-subsidized employment in the fourth quarter after leaving the program. The youth demographics include those involved in educational or vocational activities during that quarter.
- Median Income in the 2nd Quarter Post-Exit: This refers to the median income earned by individuals who have found non-subsidized employment in the second quarter after leaving the program.
- Credential Achievement: This metric indicates the proportion of participants who have either earned recognized tertiary education credentials or completed their high school education (or an equivalent) either while enrolled in the program or within a year of exiting it.
- Documented Skill Advancements: This measures the proportion of participants who, within a program year, are enrolled in educational or vocational training aimed at achieving recognized post-secondary credentials or employment, and have made verifiable gains in academic, technical, or occupational skills.
- Employer Engagement Effectiveness: This evaluates the efficacy of Puerto Rico's workforce system in meeting employer needs. It does so by examining metrics such as employee retention rates, the extent of employer engagement, and the rate of repeat business by employers.

The tables below provide the anticipated levels of performance for Title I, II, III, and IV programs.

Adult Program Performance Indicators

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	56.00%		56.50%	
Employment (Fourth Quarter After Exit)	51.60%		52.10%	
Median Earnings (Second Quarter After Exit)	$3,500.00		$3,800.00	
Credential Attainment Rate	54.00%		54.50%	
Measurable Skill Gains	55.50%		56.00%	
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

1 The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

Dislocated Program Performance Indicators

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	60.00%		60.50%	
Employment (Fourth Quarter After Exit)	60.00%		60.50%	
Median Earnings (Second Quarter After Exit)	$3,600.00		$3,900.00	
Credential Attainment Rate	64.00%		66.00%	
Measurable Skill Gains	46.00%		47.00%	
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

1 The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

Youth Program Performance Indicators

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	52.00%		52.50%	
Employment (Fourth Quarter After Exit)	52.20%		52.70%	
Median Earnings (Second Quarter After Exit)	$2,500.00		$2,600.00	
Credential Attainment Rate	35.50%		39.50%	
Measurable Skill Gains	42.00%		44.00%	
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

1 The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

	Effectiveness in Serving Employers			
	Program Year: 2024		Program Year: 2023	
	Actual Level	National Level	Actual Level	National Level
Retention Same Employer Rate	67.4		38.4	56.5
Employer Penetration Rate	4.8		8.3	8.0

Additional Indicators of Performance
1.
2.
3.
4.

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

Puerto Rico's assessment of its workforce development system effectiveness will evolve from purely a compliance-based model to a data-driven, predictive framework. Assessment will be

centered on how well the workforce system bridges the middle-skill gap while driving the Governor's Reshoring Strategy.

The Commonwealth will continue to track six federal primary indicators of performance to track the return on investment for federal funding and measure success.

Beyond federal performance metrics, Puerto Rico will consider reviewing the following supplemental data to track:

- Wage Growth Velocity: Measuring the rate of pay increases over the first 24 months, rather than just the median earnings at Quarter 2.
- Benefits Attainment Rate: Tracking the percentage of placements that include health insurance, retirement plans, and paid leave—critical for long-term economic independence.
- Stackable Credential Completion: Tracking how many individuals return to the system to "stack" a second or third certification (e.g., an electrician getting a solar PV certification), indicating a move toward higher-tier specialization.
- Informal-to-Formal Transition: Data tracking the number of workers who previously reported zero income but are now appearing in the PRIS (Puerto Rico Integrated System) with reported wages.
- Time-to-Fill for Priority Sectors**:** Measuring how many days it takes to fill a vacancy in Aerospace or Biopharma compared to the island-wide average.
- Co-Enrollment Intensity**:** The percentage of participants receiving services from more than one WIOA Title (e.g., Title I training + Title II English literacy). High co-enrollment suggests a truly "integrated" system.
- The "Participation Gap" by Region: Comparing the Labor Force Participation Rate of a specific LWDA against its neighbors to identify "hidden" pockets of disconnected workers.
- Return on Investment (ROI) by Provider: Analyzing the per-participant cost versus the long-term tax revenue generated by their subsequent employment.

Puerto Rico will also consider assessing effectiveness by measuring how its activities impact the specific strengths and weaknesses identified in workforce system and summarized in the chart below.

Strategic Goal	Effectiveness Metric	Target Outcome
Close Middle-Skill Gap	Credential Attainment in Technical Trades	Move 4% of the labor force into certified technical roles.
Increase Labor Participation	Co-Enrollment Rate (Titles I-IV)	Increase participation from ~45% toward 48% by reducing barriers.
Reverse Brain Drain	Retention Rate of STEM Graduates	Measure the percentage of UPRM graduates placed in local Reshoring jobs.

(c) State Strategy. The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must consider the State's economy, workforce, workforce development, education and training activities, and the analysis provided in Section (a) above.

Include discussion of specific strategies to address the needs of the populations provided in Section (a).

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

State Strategy Implementation/Board Functions

Since the inauguration of Governor González-Colón in January 2025, Puerto Rico has entered a pivotal era of workforce revitalization. While the State Workforce Development Board (SWDB) completes its final confirmation phase, it has already moved aggressively to modernize the Island's labor pipeline. The Board's goal is positioning Puerto Rico as a premier destination for global investment and local talent cultivation.

Pillar I: Strategic Planning & System Integration

The Board is currently architecting the 4-Year State Unified Plan Modification, moving beyond administrative requirements to create a roadmap for total system integration.

- Operational Synergy: Through the implementation of WIOA and Wagner-Peyser (W-P) co-enrollment policies, the Board is eliminating silos.
- Institutional Governance: By refining the roles of One-Stop Operators and instituting rigorous Local Board re-certification, the Board is ensuring that every level of the workforce system is held to a standard of excellence that honors the needs of Puerto Rican job seekers and business.

Pillar II: Inclusion & Path-to-Credential Excellence

Recognizing that economic growth is only sustainable if it is inclusive, the Board is dismantling barriers to entry through high-impact partnerships.

- Strategic Alliances: Collaborations with the Polytechnic University and the Boys & Girls Club bridge the gap between academics and youth career readiness.
- Credential Integrity: The Board is mandating a shift toward "Career Pathways" that culminate in industry-recognized credentials, ensuring that training yields a high Return on Investment (ROI) for participants.
- Accessibility: A comprehensive review of the 16 American Job Centers (One-Stops) is underway to ensure they serve as modern, accessible hubs of opportunity for all citizens.

Pillar III: Sector-Driven Economic Growth

The Board has transitioned to a "Business-First" intelligence model, aligning federal WIOA investments with the industrial sectors most critical to Puerto Rico’s future.

- Targeted Investment: Strategic funding is now prioritized for Advanced Manufacturing, Life Sciences (Med-Tech), Aerospace, and Energy, specifically designed to support the reshoring of vital industries.

- Apprenticeship Expansion: By scaling Registered Apprenticeships in high-growth areas like Clean Energy and IT, the Board is providing businesses with a "work-and-learn" model that accelerates the closing of the skills gap.

Pillar IV: Data Modernization & Digital Accountability

The hallmark of the new Board is a commitment to a "frictionless" user experience through technological innovation.

- The Common Intake Initiative: The Board is spearheading the development of a unified data environment. By creating a Common Intake form and aligning disparate computer systems, the Board is reducing administrative burden for participants, allowing them to spend less time on paperwork and more time on professional development.

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

The State has identified areas in which the workforce needs to be trained strategically to meet current market trends. For this, four unified strategies are in place to describe how the State plans to strategically align goals with specific tactics to be implemented by the stakeholders. These areas are (1) Technology, (2) Modernization, (3) Integration, and (4) Competencies/competitive.

In terms of Technology, the Department of Economic Development and Commerce is looking to finalize the implementation of co-enrollment and co-registration in all programs required using the Participant Record Information System known as PRIS. This system is already in use, but the state is working to expand its capability to ultimately help stakeholders in providing better services to the existing participants. Also, was identified the need to develop a Mobile App that could provide participants and businesses with a system in which services can be requested. To achieve this, the State is currently evaluating policies and professional development strategies focused on

technology to provide adequate training that will result in having a well-trained workforce capable of effectively using the technology available in the market. Lastly, it is important to measure the benefits from these efforts; Therefore, a statistical method needs to be identified and implemented.

ARV is working towards improving the use of technology by having a case management platform in place. However, another aspect that is under review is having a platform for referrals that can facilitate the process of providing services to participants as well as having other stakeholder services available. Currently, efforts are being made to have PRIS help in this process.

The Puerto Rico Department of Education through WIOA Title II is working towards making sure that all Adult Learners are exposed to technology. Participants will be exposed to virtual learning experiences and professional development targeting emerging technologies. To achieve this, the PRDE must continue to improve the technological infrastructure available in the classrooms, improve the Internet service, and identify classrooms to turned into interactive classrooms across state.

The Puerto Rico Department of Labor and Human Resources has entered a MOU with DDEC/PDL in which 1.7M have been identified to improve PRIS. Components such as Wagner-Peyser, RESEA/WPRS, and other modules within PRIS needs to be developed and implemented to provide employment services as well as gathered statistical information to measure performance. On the other hand, PRDOLHR is working to finalize a service contract to automate WOTC program operations. This project should result in having in place an agile process in which certification process of businesses can be done online; currently, it's being done manually which causes a backlog of applications.

In terms of modernization, the DDEC is working to improve PRIS system as previously mentioned. The focus of this is to make this system capable of having all related files accessible within the system and determine eligibility. Also, PRIS must include a module in which providers can be evaluated, approved, and generate performance reports. Another aspect that is under consideration is to establish a connection between local system and national systems such as talent pools, job search engines, and connect accountability systems to manage funds. Lastly, we must

move towards going paperless and for this we must continue to digitize all efforts within stakeholders.

In this line of modernization, the Puerto Rico Department of Education has implemented a system to provide Online Professional Development to teachers in which technology is a focal point. However, it's being identified that a Distance Education Program needs to be developed. By having a Distance Education Program other technological skills will be part of the experience. This could potentially result in having participants acquiring skills used in the current job market and not being used in traditional educational settings. In this sense, tablets and computers are being purchased and distributed. However, more equipment needs to be bought.

PRDOLHR contracted a service provider to evaluate through focal meetings with Employment Services Personnel the specific needs of Professional Development. The main focus of this was to identify those specific areas in which the personnel needs to acquire or improve their skills that will better the experience along with better structures to place participants in a job that match their skills.

Moving to the third area of integration, the Department of Economic Development and Commerce is working to improve PRIS by having all stakeholders connected to the same system and enables co-registration, cost allocation, and quality control of services provided. Also, the Register Apprenticeship Program has been identified as the principal strategy as is a priority identified by the USDOL.

ARV has established an alliance with The Puerto Rico Manufacturers Association to increase the number of participants with disabilities being placed in the workforce. Other alliances are being considered to integrate and being competitive in today's job market which can be challenging for people with disabilities. Also, ARV has implemented pre-employment services known as Work Based Learning Experience (Aprendizaje Basado en Trabajo) to coordinate placement not only within Public Agencies but the Private Sector as well.

The Puerto Rico Department of Education is also working to improve alliances with the public and private sector to have better learning opportunities as well as potential placement opportunities. For example, collaboration with core partners is currently in place to include services and support

participants through the American Job Centers. This is focused on providing career pathways services, adult learning experiences, referrals, among other mechanisms that can be integrated to serve this population.

PRDOLHR has in place Talento Infinito which is focused on people with disabilities and their specific needs. InPrende, provide businesses and other providers with professional development services to promote sustainable employment opportunities to participants.

The last area to be highlighted is the competitive market. For example, the Puerto Rico Department of Economic Development and Commerce is looking to expand Career Pathway Services, PRIS, and professional development opportunities to the personnel to improve their skills and competencies in their specific areas. For example, has been identified that the use of technology is one of the main areas to be improved. The job market is moving faster than the Institution of Higher Education can adapt their offerings to what is needed. Therefore, efforts are being made to integrate experiences within Technology, Information Systems, Finance, Project Management among other specific areas into their services. Therefore, these are becoming areas in which more human capital is needed.

ARV is aware of how competitive the current Job Market is and for this is increasing their presence through Service Fairs. Some of the mandatory services provided are the following: Career Exploration Counseling, Counseling on Post Secondary Education Transition, Work Based Working Experience, Social Skills and Independent Life Skills Experiences. This should result in better preparing potential candidates to be integrated into the Job Market.

PRDE for example, is working towards having pilot projects for Occupational Credentials to expand activities in which students can complete their school diploma and increase their proficiency in the English Language. Also, PRDE-OEA is looking to update and expand their Career Pathways opportunities and technical assistance to improve academic performance.

PRDOLHR continues to provide free counseling and consulting to businesses within the agriculture sector to access foreign human capital. This sector is being impacted by not having local human capital available to participate in this industry. Therefore, becomes challenging to meet the local product demand. For this, the use and integration of technology is needed to be competitive in

this market. On the other hand, PRDOLHR continues to have presence in Conexión Laboral Centers to provide employment services and job placement to those participants looking for a job.

In the pursuit of a transformative shift in Puerto Rico's economic trajectory, the strategic partnership between DEDC/PDL and the Aboul Latif Jameel Poverty Action Lab North America (J-PAL) has surfaced critical insights into the challenges faced by American Job Centers (AJCs). These challenges encompass underutilization of the services provided, low employee salaries hampering recruitment and retention, and a need for enhanced leadership skills. J-PAL's rigorous findings advocate for a comprehensive strategy, emphasizing the pillars of competition, leadership, and improved compensation, designed to rejuvenate Puerto Rico's labor force.

The economic landscape presents formidable challenges, with the island's labor force participation rate ranking as the second lowest globally. A profound 24% decline in the labor force signals an urgency for targeted interventions. Alarmingly, 6 out of 10 working-age adults are neither employed nor actively seeking employment. To address this, J-PAL proposes a strategic reliance on external expertise, injecting fresh perspectives into management practices, recruitment strategies, and competitive compensation models.

Simultaneously, the Department of Economic Development and Commerce (DEDC) spearheads the 21st Workforce Project, a visionary initiative concentrating on 21st-century skills imperative for success in a swiftly evolving digital workforce. The World Economic Forum Future of Jobs Report 2020 identifies heightened demand for STEM skills, including roles such as Data Analysts, AI and Machine Learning Specialists, and Software Developers. With a demand exceeding 20,000 new workers in Technology and Engineering, Puerto Rico must align its education system with the dynamic needs of the industry.

Educational challenges loom large, with the K-12 system leaving students ill-equipped for technical roles, faculty shortages hindering post-secondary education, and barriers impeding student completion. The stark decline of 44% in K-12 enrollment between 2006 and 2019, coupled with widespread school closures, underscores the imperative for a robust education strategy. The younger workforce, with distinct priorities and preferences for non-traditional working models, necessitates a recalibration of educational paradigms.

To confront these challenges head-on, Puerto Rico must invest in high-quality education programs aligned with industry needs, fortify faculty recruitment and retention, and cultivate robust partnerships between academia and employers. Addressing the pressing skills gap, especially in computer science roles, is pivotal for sustained economic growth.

In conclusion, Puerto Rico's commitment to revitalizing its economy hinges on a comprehensive strategy that encompasses improved workforce services, competitive compensation structures, and an education system attuned to global workforce trends. The collaborative efforts signify a proactive stance in shaping a future where Puerto Rico's labor force is skilled, competitive, and poised for success in the rapidly evolving global job market. As a pivotal recommendation, J-PAL advocates for the integration of external providers for job-market and career navigators at AJCs, aiming to inject best practices and elevate the quality of services, aligning Puerto Rico's workforce with global job market trends. This strategic approach positions Puerto Rico for sustained economic growth and resilience in an increasingly dynamic global landscape.

As mentioned in section II (a) (2), Puerto Rico has faced many challenges during the last decades. This has resulted in population decline, a decrease in economic activity, an increase in financial debt, communication challenges between the government and the private sector, and outdated energy infrastructure, resulting in higher energy costs and increased costs of living, among others. Considering these challenges, the four main goals detailed in the previous pages were outlined to achieve a fully integrated experience for the participant. This consists of providing the human capital available at career centers with the professional development needed to provide a better experience to the participant and the appropriate transfer of knowledge. As identified in the economic outlook, Puerto Rico’s businesses require human capital knowledgeable in technology and communication skills. These two elements are fundamental to creating new economic opportunities that align with the contemporary working ecosystems. Therefore, in the next section, we discuss operational planning elements that will strengthen workforce development activities.

III. OPERATIONAL PLANNING ELEMENTS

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

State Strategy Implementation. The Unified or Combined State Plan must include–

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

The State Board was locally enabled under Act 171-2014 and OE-2014-064 to promote the comprehensive planning and coordination of employment and training programs in the State.

The PRDEDC has been directed to provide support to the board through its WDP, which also administers Title I of the WIOA and TAA. The Board has planning, and coordination responsibilities related to federal support received through the WIOA and other programs with workforce development efforts.

The development of the plan is a task that the State Board accomplishes through the collaboration of the inter-agency committee integrated by the WIOA core programs in a year-round working agenda. The role and responsibilities of the State Board are defined by the WIOA, the local statute, and its internal regulations. The latter establish subcommittees and working groups in connection with technical issues. Among these are: Strategic Planning and Budget Committee, Private Sector Liaising Committee, Evaluation, Monitoring and Auditing Committee, Entrepreneurship Committee, Continued Improvement Committee, and Executive Committee.

Functions

The State Board is also responsible for assisting the Governor with additional functions designated by WIOA. These include:

- Developing and implementing a State Unified Plan and performance measures
- Developing/expanding strategies for partnerships in the in-demand sector and occupations
- Developing and aligning policies
- Developing and continuously improving the one stop delivery system; and
- Developing policies and guidance on one stop the partner's role and resource contributions.

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

(A) *Core Program Activities to Implement the State strategy*. Describe the activities that the entities conducting the respective core programs will fund the implementation of the State's strategies. In addition, we 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.

Implementation of State Strategy

To serve the most vulnerable populations and to provide a career pathway for youth, DEDC has entered into a memorandum of understanding (MOU) with the Department of Family, specifically with the Socioeconomic Family Development Administration (ADSEF), to serve recipients of the Nutrition Assistance Program (PAN) at the career centers for training and employment opportunities. Through this program, PAN recipients are referred to a career center through the Participant Record Information System (PRIS) case management system. What began as a pilot

program at the Carolina Local Workforce Development Area, has expanded to all 15 local areas on the island.

DEDC has recently entered into a MOU with the Department of Education and the Restaurant Association in Puerto Rico (ASORE), to establish a pre-apprenticeship model for youth. This program will be piloted in Caguas.

DEDC has also engaged in a partnership with the Pharmaceutical Industry Association of Puerto Rico (PIA). The pharmaceutical and biopharmaceutical sectors are "Priority Sectors" for Puerto Rico. The State Workforce Development Board plans to collaborate with PIA to align training programs with the specific technical skills needed for med-tech and life sciences.

DEDC has partnered with Puerto Rico Industries for the Blind (Brightforce Industries) to establish an apprenticeship program to provide On-the-Job Learning (OJL) to 38 new workers and 12 incumbent workers in the occupation of sewing machine operator. The registered occupation is 1-year duration requiring a minimum of 144 hours of related instruction.

Partner Engagement with Educational Institutions (Workforce Pell)

The Governor's Office is facilitating a convening between DEDC and the Department of Education to capitalize on the new Workforce Pell landscape. By integrating these federal funding streams with existing WIOA strategies, the administration is securing a sustainable, credential-driven pathway for Puerto Rico's high-growth industries.

From DEDC's perspective, the authorization of Workforce Pell Grants under Public Law 119-21 is a pivotal development for Puerto Rico's economic strategy. By expanding federal financial aid to short-term, high-intensity programs (8–15 weeks), this legislation provides a new, scalable funding stream to accelerate the Commonwealth's Reshoring Initiative.

Historically, WIOA funds in Puerto Rico have carried the heavy lifting for short-term technical training. By opening up federal tuition support through the Department of Education, Workforce Pell unlocks a sustainable funding stream that makes high-quality technical training more accessible than ever before.

Utilizing Workforce Pell for tuition, DEDC can redirect WIOA Governor's Reserve and Formula funds toward "wraparound" services—such as childcare, transportation, and specialized equipment—that are often the biggest barriers to completion. With an estimated average grant of $2,200 per student, Puerto Rico can significantly increase the number of trainees in the pipeline for the Pharma and Aerospace sectors without increasing its local budget. Furthermore, Workforce Pell supports the Registered Apprenticeship model which now allows for a sophisticated braiding of federal funds where the Department of Education covers the classroom learning for the related technical instruction component of the Registered Apprenticeship program.

Public Law 119-21 requires that all Workforce Pell programs be approved by the Governor and State Board as high-skill, high-wage, or in-demand. This creates a quality assurance model for the Reshoring Initiative. Programs for Biologics Manufacturing and Medical Device Quality Control (which typically fit the 150–600 hour window) can now be scaled rapidly.

The law's focus on industry-recognized credentials ensures that trainees are earning certifications that global firms like Amgen, Lilly, and Honeywell require for their reshored operations.

Because Workforce Pell is available to individuals who already hold a Bachelor's degree, this creates an opportunity. This is vital for Puerto Rico's reshoring initiatives because it allows college graduates in declining industries to rapidly pivot into high-paying Artificial Intelligence or Advanced Manufacturing roles. Likewise, a job seeker can get a Workforce Pell for a CNC Machining certificate today and later apply those credits toward a full Engineering degree at the University of Puerto Rico.

Workforce Pell provides the critical capital needed to scale the DECC's workforce infrastructure, transforming targeted training initiatives into a massive, sustainable pipeline for the Island's priority sectors. In the wake of the Governor's executive convening, the State Board will establish a rigorous certification framework to validate university and community college programs, ensuring total alignment with the specialized requirements of Workforce Pell and the Commonwealth's Reshoring Initiative.

Improving Access to Post-Secondary Credentials (Registered Apprenticeship)

A cornerstone of Puerto Rico's workforce and business engagement strategy is the transformation of Registered Apprenticeship (RA) from a traditional training model into an engine for industrial growth. By leveraging WIOA funds, the DEDC is creating a labor pool tailored for the global "Reshoring" movement.

Strategic Investment & Scale

Under the leadership of Governor González-Colón, apprenticeships are being institutionalized as a standard workforce solution for the Puerto Rican business community.

- Capital Infusion: More than $11 million in WIOA 2025 Governor Reserve funds have been strategically deployed to scale RA frameworks across the Island.
- Rapid Expansion: As of early 2026, the DEDC oversees 140 Registered Apprenticeship Programs, with a record-breaking 51 programs established in 2025 alone.
- Current Talent Pipeline: Puerto Rico currently supports a robust ecosystem of over 2,200 active apprentices, with 324 graduates recently attaining industry-recognized credentials that serve as a gold standard for technical proficiency.

Sector Alignment: From Legacy to Innovation

The administration is aggressively diversifying the apprenticeship portfolio to move beyond traditional trades into high-complexity, high-wage technical sectors.

Existing Sectors	Emerging Reshoring Sectors
Aerospace & Aviation	Biopharmaceuticals & Life Sciences
Mechanical Engineering	Artificial Intelligence (AI) & Machine Learning
Business Intelligence	Advanced Semiconductor Manufacturing
Specialized Construction (Carpentry)	Clean Energy & Grid Modernization

Career Pathway Pipeline

A key pillar of the new administration is the total alignment of education and industry. By embedding apprenticeship pathways into K-12 systems, community colleges, and universities, Puerto Rico is creating a seamless transition from the classroom to the production floor.

- Standardization: Apprenticeship is no longer an alternative path but a primary workforce strategy integrated into major economic development projects.
- Coordination: Enhanced partnerships with academic institutions ensure that curriculum development evolves at the speed of business, particularly in the Pharma and IT sectors central to the Reshoring Initiative.

By treating Registered Apprenticeship as an infrastructure investment rather than just a training program, Puerto Rico is ensuring that its workforce is not just "job-ready," but "future-ready"—providing the specialized talent necessary to anchor the world's most advanced industries in the Commonwealth.

(B) *Alignment with Activities outside the plan* Describe how the activities identified in (A) will be aligned with programs and activities provided by the 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.

American Job Centers in Puerto Rico have been strategically located in their respective local areas to ensure accessibility to programs and services. According to the *"Guía del Programa para Adultos, Trabajadores Desplazados y Jóvenes*", the staff will be trained to provide information to customers about the programs, services, and activities available through the partner programs. The activities listed in Section A were planned for the entire workforce development component of Puerto Rico. The strategic plan provides a framework for all workforce systems, including, but not limited to, WIOA core programs.

Job Corps

As with all required partners, the local boards are coordinating with the Job Corps Program for the delivery of its service through the development of MOUs entered between the Local Workforce Development Boards, the Chief Elected Officials, and Jobs Corps.

YouthBuild

Pathstone is the local operator of YouthBuild, and we are currently working on the process of completing MOUs with each local board.

Migrant and Seasonal Farmworkers Program

The MOU between the PRDOLHR and PathStone will facilitate the provision of educational services to MSFWs. PathStone provides education and information to agricultural workers on farms, camps, and other locations. Through the Outreach Program, PRDOLHR will leverage resources with PathStone to increase the number of MSFWs enrolled in educational services.

Activities authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)

The Senior Community Service Employment Program (SCSEP) is funded under Title V of the *Older Americans Act* Amendments of 2006, Public Law 109-365. The purposes of the SCSEP are to foster individual economic self-sufficiency and promote useful opportunities in community service activities, including community service employment for unemployed low-income persons aged 55 years or older, particularly those who have poor employment prospects, and to increase the number of persons who may enjoy the benefits of unsubsidized employment in both the public and private sectors. We are currently working to ensure that all Local Boards have their agreements with their corresponding SCSEP operator. In Puerto Rico, PRDOLHR, AARP, and Pathstone Inc. are SCSEP grantees.

Career and technical education programs at the post-secondary level authorized under the Act of 2006 (20 U.S.C. 2301 et seq.)

The Puerto Rico State Board of Career and Technical Education is responsible for implementing the Carl D. Perkins Career and Technical Education Act. The Puerto Rico Department of Education

(PRDE) is the state agency responsible for administering the program and oversees CTE in the public school system at both the secondary and post-secondary levels.

Consistent with the conditions set forth in an MOU, information regarding post-secondary course offerings and activities is available to individuals at all One-Stop career centers, and the Department collaborates with local boards throughout Puerto Rico to ensure a comprehensive workforce preparation system. A PRDE representative at the regional level sits on every local board and acts as the PRDE one-stop coordinator.

Under WIOA, the program seeks to support the system through partnerships with industry, updating of curriculum, development of career pathways to address workforce needs, articulation agreements with post-secondary education programs (Puerto Rico Technological Institute (ITPR) and the University of Puerto Rico (UPR), recruitment and training of qualified CTE teachers, teacher externships, and ongoing professional development opportunities. WIOA emphasizes greater coordination between workforce development and CTE through aligned definitions, the requirement that post-secondary CTE be a local infrastructure partner, the option to do a combined state plan that meets the planning requirements for WIOA's core programs and at least one other federal program, and other provisions.

The PRDE will continue to cooperate with the Technological Institute and other public and private post-secondary institutions, with the purpose of offering students the opportunity to complete college degrees by means of a sequential curriculum and avert any duplicity of courses. In addition, the PRDE will continue offering the dual credit program at the secondary level through which the participating students complete an associate degree in the ITPR and the UPR through a sequential curriculum, in addition to completing the high school diploma requirements.

Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)

The main goal of the Trade Adjustment Assistance (TAA) program is to assist workers who have lost or may lose their jobs because of foreign trade. The TAA program offers a variety of benefits and services to eligible workers, including job training, income support, job search and relocation allowances, and wage subsidies to workers aged 50 years and older. This program seeks to provide skills, credentials, resources, and support to displaced workers to encourage them to an early

return to the labor force. The State Dislocated Worker Unit and TAA services will be effectively integrated into the AJCs and use the network as the main point of participant intake and delivery of TAA program benefits and services. PRDEDC has developed *State Policy Number 2020-001* to ensure that the correct process is implemented with the assistance of TAA clients.

Activities authorized under Chapter 41 of title 38, U.S Code

PRDOLHR, through the Jobs for Veterans State Grant (JVSG), is committed to serving eligible transitioning service members in need of individualized career services, as well as veterans and eligible spouses, by providing resources to assist veterans with significant barriers to employment, and other eligibility in accordance with VPL 03-14 change 1 and 2 and VPL 03-19, to obtain meaningful careers and maximize their employment opportunities. JVSG commitment is an important part of fulfilling national obligations for people who have served our country.

While continuing to serve existing veterans and other non-veteran job seekers, we recognized that changes in workforce programs' service delivery strategies to veterans were needed to respond to the forecasted increase in veterans, including people transitioning from wars in Iraq and Afghanistan to the civilian labor force. Additionally, we are collaborating with workforce partners to ensure that changes are affected, so that workforce programs are aligned with the roles and functions established in their authorizing legislation.

Disabled Veterans' Outreach Program Specialist (DVOP)

The JVSG staff were refocused on their statutory duties to ensure that eligible veterans and spouses received the best combination of services according to their needs. To accomplish this refocusing, Disabled Veterans' Outreach Program (DVOP) specialists serve only those veterans and eligible spouses most in need of individualized career services. Consequently, DVOP specialists will serve a narrower group of veterans and eligible spouses, enabling specialists to provide individualized career services to most of the people they serve. This, in turn, will impact the core programs, including WP and Title I. under 38 U.S.C. 4103A(a), a DVOP specialist provides individualized career services and facilitates placements to meet the employment needs of veterans, prioritizing services to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the USDOL. Policies and procedures are in place to

specifically prohibit DVOP specialists from performing non-veteran-related duties that detract from their ability to perform statutorily defined duties related to meeting the employment needs of eligible veterans. Additionally, regular audits are performed by DVET to ensure compliance with the limitations of the duties of the DVOP specialists.

DVOP specialists also place maximum emphasis on assisting economically or educationally disadvantaged veterans. To ensure that DVOP specialists can fulfill their statutory responsibilities to provide individualized career services to these categories of veterans, they are required to follow guidance developed by the USDOL and the Employment Service to identify the veterans prioritized and emphasized by the DVOP statute. An eligible veteran or eligible spouse who is identified as having a significant barrier to employment is immediately referred to a DVOP specialist after being triaged or, in instances where a DVOP specialist is not available, another provider of individualized career services within the AJC system. DVOP staff and other AJC staff provide veterans with SBEs and other eligible individuals with access to occupations in demand, training, and other services expected to be generated through the application of the priority of service through the provision of individualized career services with the goal of finding long-term sustainable employment.

Local Veterans' Employment Representative (LVER)

LVERs perform only the duties outlined in 38 U.S.C. 4104(b), which are related to outreach to the employer community and facilitation within the State's employment service delivery system. LVERs have assigned duties to promote employers, employer associations, and business groups the advantage of hiring veterans. LVERs, where implemented, are part of the One-Stop Career Centers “business services team” or as an entity, and as such, serve as an active member of that team. In addition, LVERs advocate for all veterans served by the network with business, industry, and other community-based organizations by participating in appropriate activities, such as:

- Planning and engaging in job and career fairs
- Conducting employer outreach
- In conjunction with employers, conducting job searches and workshops and establishing job search groups

- Coordinating with labor unions, apprenticeship programs, and businesses or business organizations to promote and secure employment and training programs for veterans
- Informing Federal contractors of the process of recruiting qualified veterans.
- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating in business outreach efforts.

Gold Card Initiative

The Gold Card provides unemployed post-9/11 era veterans with individualized career services and follow-up services needed to succeed in today's job market in accordance with TEN 15–11. The Gold Card initiative is a joint effort of the USDOL/ETA and the Veterans' Employment and Training Service (VETS). ETA and VETS have developed a series of enhanced individualized career services, including follow-up services, to identify the barriers to employment faced by veterans in the 9/11 era.

Veterans are to identify themselves as veterans at the reception desk and complete a short questionnaire, where one of the questions is whether he or she is a 9/11 veteran. Once identified as a 9/11 veteran, the individual is triaged and referred to the DVOP to receive six months of individualized career services to assist the veteran in seeking and securing a job.

The services, when provided under the Priority of Services to Veterans, are designed to overcome those barriers and to reinsert the 9/11 era veterans into the labor workforce.

The enhanced in-person services available for Gold Card holders at the local American Job Center may include:

- Job readiness assessment, including interviews and testing,
- Development of an Individual Development Plan (IDP),
- Career guidance through group or individual counseling that helps veterans make training and career decisions,
- Provision of labor market, occupational, and skills transferability information that informs educational, training, and occupational decisions,
- Referral to job banks, job portals, and job openings,

- Referral to employers and registered apprenticeship sponsors,
- Referral to training by WIOA-funded or third-party service providers, and
- Monthly follow-up by an assigned case manager for up to six months.

Programs authorized under State unemployment compensation laws (in accordance with applicable Federal law)

PRDOLHR's UI programs include regular UI, UCX, UCFE, TRA, and PAB.

The main purpose of Unemployment Insurance is to pay benefits to claimants and help them return to the labor market before they exhaust their UI benefits. The Bureau of Employment Security, UI Division, will support WIOA through the RESEA personnel and by assigning one UI merit staff member to address any unemployment claimant's issue. PRDOLHR is committed to improving re-employment service delivery strategies. These strategies are included in the new RESEA program and the core program activities to be implemented in the State Unified Plan. RESEA staff will be ascribed to the program as a team for the provision of re-employment services to UI claimants selected to participate in the RESEA program. A UI merit staff member is available to work on program management. This UI staff member serves as a point of contact for technical assistance regarding UI issues, policies, and procedures.

This approach will ensure that claimants served through the RESEA program at the One-Stop Centers to meet the eligibility provisions of State laws and receive an appropriate level of service suited to each individual claimant and be exposed to re-employment services (RES), including guidance, evaluation, individual employment plans, labor market information focused on claimant needs, referrals to self-directed job search, additional services (job search workshops, assistance in finding employment, occupational counseling, and referrals to other services), and eligibility reviews to continue receiving unemployment benefits (UI). RESEA staff will provide traditional RESEA activities, such as UI eligibility review and referrals to adjudication. Responsibilities include registering UI claimants in Wagner-Peyser as required by State law, referral of UI claimants to career counselors as deemed necessary, case management, one-on-one personal interviews with the UI claimant, job search workshops, orientation of services available through the One-Stop Centers, referral to job offers, UI eligibility review, and providing of UI claimants with labor market

information. These services will be managed by the Re-employment Service staff and, as appropriate, by a licensed career counselor where available (not all offices have a career counselor on-site).

As part of this commitment, the PRDOLHR will closely monitor these strategies to ensure their successful implementation to help UI claimants in the RESEA return to the labor market before exhausting their UI benefits. Through the RESEA initiative, ES will make efforts to implement strategies to improve UI connectivity with the public workforce system and improve re-employment service delivery strategies. PRDOLHR is committed to continuing to make progress, connecting UI claimants to job opportunities and/or services that will speed their return to employment.

Programs authorized under Part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), subject to Subparagraph (C).

Coordination with TANF will be strengthened to identify and pursue braided funding opportunities to support common services and transition to procedures that facilitate serving customers under both TANF and core programs. In the short term, cross-program knowledge and understanding of TANF and core programs will be delivered to staff members, and a formalized referral process will be implemented to deliver career counseling and training coordination services and to provide access to job development and placement services for TANF customers. We are currently working to ensure that all Local Boards have their agreements.

Employment and training programs were administered by the Social Security Administration, including the Ticket to Work and Self-Sufficiency Program established under Section 1148 of the Social Security Act (42 U.S.C. 1320b–19).

Through the issuance of local planning and certification guidance, the State Board will encourage local boards and operators to become engaged in the Ticket-to-Work program as qualified Employment Networks. Currently, two LWDBs are qualified as an Employment Network (Caguas-Guayama and Manatí-Dorado), and the Sureste LWDB is going through the qualification process.

PRVRA continues to receive referrals from the Ticket to Work Program to provide vocational rehabilitation services. In addition, the PRVRA established an agreement with the Caribbean Center of Work Incentives Planning Assistance (CWIPA) to provide benefit-planning services to consumers of the PRVRA, who are beneficiaries of the Social Security Disability Insurance. This service is expected to help beneficiaries in decision-making regarding the benefits of reintegrating into the labor market.

As required under the WIOA, PRVRA will coordinate its services with the Employment Networks for common customers, including individuals receiving assistance from an Employment Network under the Ticket to Work program, detailing how the responsibility for service delivery will be divided between the network and the agency.

Employment and training programs conducted by the Small Business Administration (SBA)

Coordination with the local district office of the SBA will be enhanced to fully tap into the opportunities available under the program for entrepreneurial capacity-building and development. As previously discussed, although self-employment in Puerto Rico accounts for twice the national average, entrepreneurship development still lags significantly compared to other jurisdictions, thus representing a key opportunity for private employment creation.

Through planning guidance, local boards will be encouraged to engage the SBA and its network of Small Business Technology and Development Centers (SBTDCs) with locations in six local areas, and its specialized centers for international trade, technology, and innovation; and the program initiatives servicing students, women, veterans, national guard reserve personnel, young and emerging entrepreneurs, older persons, and homemakers. Local boards should also be encouraged to leverage the small business regional clustering organization initiative that serves the entire Island led by the SBA.

Under the lead of the PRDEDC, the Federal Contracting Center will approach the SBA program to devise ways to effectively market the HUBZone’s opportunity to "Under the Flag" industries, helping to expand the employer's availability in 76 of the 78 municipalities identified and Labor Surplus Areas.

Programs authorized under Sections 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)) and work programs authorized under Section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o)).

The USDA's FNS oversees a U.S. block grant to Puerto Rico that funds the Nutrition Assistance Program (NAP), a separate food assistance program implemented since 1982 in lieu of SNAP. Section 4142 of the Food, Conservation, and Energy Act of 2008 mandated the completion of a study to provide information to aid Congress in understanding the potential impact of re-establishing the Supplemental Nutrition Assistance Program (SNAP) in Puerto Rico in lieu of block grant funding. The block grant remains. Adults are exempt from the work requirement.

Programs conducted under Section 112 of the Rehabilitation Act of 1973 (29 U.S.C.) 732)

The Client Assistance program remains under the Office of the Advocate of Persons with Disabilities. The system's components that provide services to persons with disabilities will be made aware of the obligations arising under Section 20 of the Rehabilitation Act. Providing information on means of seeking assistance under the Client Assistance program. PRVRA, as a state-designated agency for administering the core program under the Rehabilitation Act, will also continue enforcing compliance section 102, providing individuals with a description of services available from the client assistance program and information on how to contact the program as part of the eligibility determination process.

Registered Apprenticeship

Since July 1, 2018, the Apprenticeship Program has been under PRDEDC. The WDP oversees the implementation of the program in the workforce system. As part of the strategy for effective implementation, the WDP received technical assistance from the National Apprenticeship Office and Region I of Boston. Work-based learning opportunities offered by the AJC are marketed by both the Case Manager and Business Services Representative staff. This staff member pursues opportunities for employers and makes appropriate referrals to work-ready participants. The PRWDB coordinates work-based learning opportunities across partner agencies to ensure the maximization of employer contact and to avoid business-contact fatigue. PRWDB research opportunities and develops relationships with local businesses and partners, including those with

registered apprenticeship programs and training providers, to make these training models available to participants. In accordance with the standards described under Career Services, feedback mechanisms between Training Services and placement functions are in place to ensure that the training provided meets the needs of the business.

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

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Even though PR revised the narrative to include information about the MOUs, the response does not include how services to individuals are coordinated or aligned with support from all partners. Puerto Rico must describe how they meet this requirement for Titles II and IV.

The DEDC, through its WDP, has the mission to implement a coordinated and integrated system for workforce development that provides access to employment and training services through its fifteen (15) Local Workforce Development Areas (LWDA's) and in joint efforts with core partners, educational institutions, and the private sector, to promote the economic development of Puerto Rico.

DEDC is the leading agency for the administration of the WIOA Core Programs. DEDC is also responsible for the TAA grants. The PRDE is responsible for Adult Education and Family Literacy under Title II. PRDOLHR is responsible for Wagner-Peyser, Veteran Services through the Jobs for Veterans State Grant, and the UI. Under PRDOLHR, the Vocational Rehabilitation Administration is present in the AJCs. Additionally, SCSEP is also within PRDOLHR, but partially because AARP and

Pathstone, Inc. are also operators of the program. To improve the integration between programs, Puerto Rico implemented the following framework:

Inter-agency Efforts

The WDP ensures that the strategies and goals at the service delivery level are consistent with the State Board's vision and goals. The State Workforce Development Board (SWDB), consistent with the WIOA requirements, comprises business leaders from throughout the State, representatives of the education sector, representatives of organized labor, and state agency leaders. The mission of the board is to promote lifelong learning by collaborating with businesses, agencies, and organizations to bring the State's education, employment, and training programs together into a workforce development system that provides the means for residents of Puerto Rico to gain sufficient skills, education, employment, and financial independence.

Data Communication

The focus on service integration enacted by the WIOA has motivated the DDEC to consider ways to link and allow tracing of participant data between partners, especially core programs, to improve communication and reduce duplication of services. The WIOA emphasizes the importance of a comprehensive system that provides integrated, uninterrupted services to all participants and effective strategies that meet employers' workforce needs. The State intends to have a comprehensive system of on-demand reports, utilizing data from its statewide shared database, which allows state and local staff to view outcome data at the State, regional, local, and case manager levels for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. In addition, the State seeks to have the necessary integration with Title II and Title IV programs.

Regional and local plans, MOUs, and cost-sharing agreements will facilitate integration across the various data systems of all the required partners that participate in the workforce system over the next four years. The DDEC supports data-sharing and alignment at the state level by convening a data-sharing group across state agency partners and at the local level. The DDEC supports education and training on specific systems and will advocate for policy changes, as needed, to establish data-sharing agreements.

Coordination of Services through One-Stop Centers

The American Job Centers in Puerto Rico are engines that lead the efforts and coordination of the workforce's service delivery on the Island. The AJCs ensure that job seekers receive comprehensive, coordinated, and high-quality services from all partners. The AJCs in Puerto Rico have the same services; however, each geographic area on the Island has individual characteristics, so each AJC adjusts to these needs to promote optimal and adapted services. It should be noted that these centers operate under applicable federal and state regulations. The functions of each partner are described in the Memoranda of Understanding, as required by the WIOA. Each AJC has an Executive Director responsible for coordinating Services through One-Stop Centers. The director must also ensure the availability of services offered by partners within the AJCs, including Title II and Title IV. The One-Stop centers host these programs' representatives, including representatives from the PRDE (for Title II) and the VRA (for Title IV). Providing direct access to representatives from these agencies and programs improves the delivery of services, strengthens networks, and supports the effective implementation of protocols existing between the PRDE and VRA, including the coordination of Individualized Educational Programs. To ensure that they provide a high quality of service to individuals, AJC staff receives ongoing training, has the necessary tools to perform their duties, and has the resources to provide optimal service to meet everyone's needs. System partners collaborate through referrals, individualized attention, and other services. The State Plan provides cross-training as a part of statewide initiatives. The main objective of this initiative is for AJC staff to have up-to-date knowledge of the services offered by the WIOA members in Puerto Rico. This training will allow for more streamlined service delivery within AJCs.

Coordination among Programs

The core and required partner delivery of services revolves around a customer-centered integration and continuous improvement approach, supported by appropriate guidance to align programs, local boards, operators, and providers; staff cross-training on program requirements and referral procedures; and a process focusing on the provision of services along with functional areas. Service integration in One-Stop Centers will be led by a One-Stop Operator with core programs,

required programs, and additional programs authorized to join the system that will remain accessible as required by the rule.

AJC operators coordinate the individual services between partners to deliver services according to their needs. The service flow follows the general service flow to serve job seekers at One-Stop Centers:

- The greeting and identification of new customers or participants are completed at a common intake, where the operator's staff records control data and validates it through the case management system (if the customer is new or is receiving services under a program).
- Claimants of Unemployment Compensation Insurance scheduled to receive re-employment services are referred directly to UI services.
- The One-Stop Operator provides orientation to customers and helps them obtain a general understanding of the services offered through the One-Stop network.
- If the customer opts to assist him/herself during job search, resume writing, telephone, and resource use, he/she will be guided to the One-Stop resource center, delivery of labor exchange services through self-service, self-service technology tools, and staff-assisted services.
- If deemed ready for employment, the customer will be led to receive labor exchange services, including job referrals and job placement follow-up.
- Job seekers seeking employment first receive services from Wagner Peyser's Employment Service. If the job seeker is a new customer, their demographic and registration data will be gathered and sent to assisted services to be counted as a reportable individual.
- If an individual needs additional services to enter employment or continue an educational career, or requires improvement of their employment skills, it is determined that they need assisted services and is hereinafter considered a participant under WIOA.
- The Case manager or Career Planner completes an assessment to determine participants' needs, goals, job skills, and readiness. A common assessment tool is being developed to account for the information requirements of all cores and partners, thus facilitating the joint service of the customer.

- Participants can enter the system through any of the core partner programs according to their specific service needs. The AJC Operator coordinates the assistance of AJC partners in accordance with the requirements determined by the objective assessment. Currently, services are coordinated through a referral process. With the development of the RFP DDEC-PDL-2020-06, to expand the scope of the PRIS database, the State seeks to improve the technological integration of core partner databases through the PRIS.
- The referral structure is critical to the system's effectiveness and is enabled by the MOUs among the programs. The One-Stop Center staff must have a thorough understanding of program requirements and services to effectively assess the participant's eligibility under the various programs, avoid "wrong–doors" and duplication regarding the delivery of services, and ensure the efficient use of program resources and outcome achievement.

Title II Services

- The One-Stop Center's network will be complemented by Title II activities administered by the Adult Education and Literacy Program offered at PRDE schools. As a core service, Title II will support the One-Stop service delivery system to help participants attain a secondary school diploma; transition to post-secondary education and training using career pathways, integrated education, and training; and receive workforce preparation activities and services needed to succeed in the labor market.
- Program resources will be prioritized and coordinated with partnering programs to shore up services that reflect the needs of the workforce.
- The main service under the program addresses the needs of Adult Basic Education, especially among disadvantaged, low-income adults, and criminal offenders. The program assesses the participants' skills and provides them with the literacy and math skills necessary to become literate at the levels of proficiency necessary to function on the job, in the family, and in society.
- The program will continue to coordinate with the PRDCR to address the needs of eligible adult literacy participants in juvenile detention centers and correctional facilities through collaborative services including vocational training, adult literacy courses, personal and

workforce preparation counseling, and teacher cross-training. The Special Education staff is also integrated into the planning function because a substantial number of inmates are also adults with disabilities.

- Another Title II service is English language instruction. The PRDE prioritized playing an active role in facilitating the participants' goal of becoming bilingual.
- English classes and Conversational English will continue to be provided as part of the Adult Education Program offered in schools and Adult Education program centers. The objectives of conversational ESL and academic English programs are to provide adults with the knowledge and skills necessary to make correct use of the English language in academic as well as in work settings; develop adults' listening, reading, writing, and oral skills; and measure their performance using the English program standards and performance measures established for English as a Second Language.
- Other service delivery program services focus on adults in need of workplace literacy. The objective is to develop the required skills and knowledge to enable participants to obtain, retain, or upgrade their employment once they complete specialized training or vocational education. Targeted populations are disadvantaged adults, adults with disabilities, single parents, and displaced homemakers. The goal of these services is to address and improve the specific needs of workforce workers' productivity. These activities are delivered at the workplace and/or at employment development centers. The content is tailored to the needs of the workforce and remains accessible to participants, including continuous learning using technology and in coordination with groups and resources in the community to supplement services.
- The third order of priority for delivering services targets individuals facing barriers to employment, particularly disadvantaged and homeless adults, single parents, adults with disabilities, and displaced homemakers. These will be served through an Adult Basic Education program that aims to improve basic skills in language and mathematics.
- These programs provide adults with academic, employability, and self–improvement skills to assist them in attaining a secondary school diploma and in the transition to post-secondary education and training.

- The fourth priority targets immigrant and disadvantaged adults, homeless adults, single parents, and displaced homemakers through Family Literacy programs. The next order of priority in delivering services will be afforded to Adult Secondary Education services for disadvantaged adults, individuals with disabilities, the homeless, incarcerated adults, adults with disabilities, single parents, and displaced homemakers at level three or above who need to attain a high school diploma or high school equivalency and transition to post-secondary education.
- Title I partners will offer basic and individualized service careers or any other allowable service required by the participant to obtain or retain employment. Once the participant is ready for employment, the program might pursue any job placement activity allowed by the program or refer the participant back to the Employment Service.
- PRDE's AEP will work collaboratively with other core programs and partner agencies to expand access to education, training, and employment opportunities for adult learners. The AEP will provide resources and services through American Job Centers (One-Stop Centers), including orientation about program opportunities, career pathways, transition resources, referral processes, and other joint mechanisms developed through agency partnerships. The Adult Education Program has signed a memorandum of understanding (MOU) with the 16 American Job Centers (AJC) for collaboration and contributes to infrastructure costs for the operations of the AJC. The AEP maintains a regular employee staff member at each of the 16 One-Stop Centers one day a week to evaluate adult education potential participants and make referrals to the adult education service providers approved by the AEP for services. These AEP employees make cross-referrals between One-Stop centers and AEP service providers.

Youth

- According to Sec. 129(c)(2) of the WIOA, local areas must make up each of the required fourteen youth elements required for youth participants. Local youth programs must be designed to provide an objective assessment of each youth participant that meets the requirements of WIOA Section 129(c)(1)(A) and include a review of the academic and

occupational skill levels, as well as the service needs, of each youth to identify appropriate services and career pathways for participants and inform the individual service strategy.

- When designing youth employment and training programming, State and local areas should consider the following design elements: promotion and increase of meaningful work experience opportunities as set forth in Section 129(c)(2)(c) of WIOA, particularly for out-of-school youth; increase of service delivery for youth with disabilities; need to address the issues impacting service delivery for out-of-school youth; need to ensure quality case management through the monitoring process; and provision of effective follow-up services.
- In efforts to engage out–of–school youth (OSY), both the Adult Education and Literacy Program and the AJC Title II partner strengthen coordination with school districts. Local boards will also be encouraged to coordinate with other programs servicing youth, such as Foster Care and TANF programs, residential programs, and community–based initiatives.

Adults and Dislocated Workers

- The main goal of the Adults and Dislocated Workers Program is employment. Coordination with Wagner Peyser's Employment Service is crucial for participants to achieve the goals set out in their Individual Employment Plan (IEP). Capacity-building efforts under Title I will focus on work–based training. The main source of participants in both programs is the Employment Service. Common intake and case management are key tools for the AJC operator to coordinate services among three programs: adults, displaced workers, and employment services. The new PRIS database platform contains integration elements using the same database: case management, intake, and reporting.
- The PRIS's first phase of implementation targeted compliance with required reporting. We are expecting that through the RFP DDEC-PDL-2020-06, the State will be able to develop technology integration of the Title I, Title II, Title IV, TAA, Rapid Response and Apprenticeship. The selection of the technology service provider for this second stage of the PRIS will be crucial to achieve integration of technological services, avoid duplication

of services, and expand the connectivity of core partners through online systems at the AJC.

Vocational Rehabilitation Services

- PRVRA provides a wide range of services to people with disabilities to integrate them into the workforce, including training in personal/occupational settings, pre-employment services, counseling, and job readiness services (resumes, interviews, identification of candidates ready for employment, and referrals to job offers), among others. PRVRA will continue to serve people with disabilities to integrate them into the workforce. In addition to supporting full access to services through One-Stop Centers, the ARV continues to serve youth and students with disabilities, with an emphasis on those with significant disabilities and in need of Pre-Employment Transition services. To this end, the Administration will maintain its collaboration with the PRDE's Special Education program to accelerate the implementation of students' individualized plans, continue offering guidance in schools to students, parents, and school staff, and participate in PPT meetings.

State Memorandum of Understanding (MOU) One Stop Partners

The coordination and alignment of services among AJC partners are initially established at the state level through the signing of a MOU among the grantee agencies of Title I core programs. The MOU was signed on September 28, 2018, effective June 30, 2021. The Secretaries of the Department of Economic Development and Commerce, the Department of Education, the DOL and Human Resources, and the Vocational Rehabilitation Administration; grantees of WIOA core programs; and the Presidents and the fifteen (15) Local Boards that are part of the Puerto Rico Workforce Development System signed a state agreement to ensure the operations of the One-Stop Center-American Job Centers, to lay the groundwork for the provision of services to participants in the AJC and the negotiation of local MOUS.

The objectives of the state MOU are as follows:

- to establish the parameters of negotiation at the local level,

- define the framework of reference that should govern each agreement between the Local Board and the partners,
- clearly define the parameters of the respective human resources commitments for each grantee,
- Provide foundation elements for representatives of state agencies (grantees) and Local Boards to negotiate their respective memoranda of understanding.

The content of the MOU encompasses the following agreements between the grantees of the programs:

- Description of the PR One Stop System,
- Roles and Responsibilities of core and required partners,
- Availability of Career Services,
- Services to Population with Multiple Barriers to Employment,
- Resources and Costs,
- Continuous Improvement and Duration of the MOU,
- Local Terms and Economic Conditions,
- Local Memorandum of Understanding,
- Review, Amendments, Dispute Resolution, and Impasse process,
- Sexual and Labor Harassment, Alcohol and Drug Free Environment,
- MOU Dispute Resolution Process, and
- Discrimination Policy.

MOU Summary

The next section presents a summary of the state MOU's content, which sets the rules for coordinating services between partners to provide services to participants and employers; Description of One Stop Center System:

1. A system with fifteen (15) Local Areas offers training and employment services through its 16 One-Stop Centers (AJC) throughout Puerto Rico. The AJC design of the AJC must have a continuous presence of services represented by the core and required partners,

i. Programs authorized under title I of WIOA include the following:

1. Adults,
2. Dislocated workers,
3. Youth,
4. Job Corps,
5. YouthBuild,
6. Native American programs, and
7. Migrant and seasonal farmworker programs.

2. The required partners are the entities responsible for administering the following programs and activities in the local area:

a. The Wagner-Peyser Act Employment Service program authorized under the Wagner-Peyser Act (29 U.S.C. 49 et seq.), as amended by the WIOA title III.

b. The Adult Education and Family Literacy Act (AEFLA) program authorized under title II of WIOA;

c. The Vocational Rehabilitation (VR) program authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), as amended by WIOA title IV:

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

e. Career and technical education programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.);

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

g. Jobs for Veterans State Grant programs authorized under Chapter 41 of title 38, U.S.C.;

h. Employment and training activities conducted under the Community Services Block Grant (42 U.S.C. 9901 et seq.);

i. Employment and training activities conducted by HUD.

j. Programs authorized under State unemployment compensation laws (in accordance with applicable Federal law)

k. Programs authorized under sec. 212 of the Second Chance Act of 2007 (42 U.S.C. 17532); and
l. TANF authorized under Part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), unless exempted by the Governor under §678.405(b).

Roles and Responsibilities

Section 121 lists the minimum responsibilities of partners in the AJC:

a. Promote AJC system integration and have available basic career services consistently and coordinately through the OSC-AJC operator.
b. Develop a flowchart for delivering efficient services to employers, participants, and clients.
c. Provide access to services to meet the needs of workers, job seekers, youth, and people with barriers to employment, including people with disabilities.
d. Establish a method to subsidize the costs of services and operation of the system.
e. Determine the standards of service and branding for co-located partners.
f. Commitment to providing training and professional development opportunities to the AJC staff.
g. Facilitate communication channels between partners and other components of the AJC in coordination with the AJC operator.
h. Development and design of public policies, standards, and processes.
i. Provide additional services to the WIOA to meet the needs of the participants.

Delivery of Basic Career Service

1. Basic Career Services will be universally available for the entire AJC population.
2. Each partner is responsible for delivering services corresponding to their program.
3. Partners must avoid the duplication of services.

Service to people with barriers to employment

Partners must ensure that services are available to people with barriers to employment The term ‘‘individual with a barrier to employment’’ means a member of one or more of the following populations:

a. Displaced homemakers.
b. Low-income individuals.
c. Indians, Alaska Natives, and Native Hawaiians are defined in Section 166.
d. Individuals with disabilities, including youths with disabilities.
e. Older individuals.
f. f. Ex-offenders.
g. g. Homeless individuals (as defined in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as described in Section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2))).
h. Youths who are in or have aged out of the foster care system.
i. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
j. Eligible migrant and seasonal farm workers, as defined in Section 167(i).
k. Individuals within two years of exhausting lifetime eligibility under Part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.).
l. Single parents (including pregnant women).
m. Long-term unemployed individuals.
n. Other groups such as the Governor determine.
o. Employer services fall into two categories:
    I. Participation and Commitment- Educate and provide general information to employers on how the services in the AJC can represent solutions to their challenges or needs in terms of the employment of qualified personnel.
    II. Business Services- Develop customized strategies based on their profile to determine the needs of employers in a way that addresses the challenges related to Recruitment, Employment, Training, Closures, and Layoff.

Resources and Cost Sharing

- The provision of direct services to participants and employers is a priority in CGUAJC.

- Each partner is responsible for subsidizing the direct services related to their program without losing the perspective that the provision of services for each partner must be transparent to the participant.
- All partners share equitable and proportionate responsibilities for the operating expense costs of the CGU-AJC.

Continuous Improvement and MOU Validity

- All partners must participate in the process of programmatic review, continuous improvement, integration of original ideas, innovation, and efficient approach.
- Partners seek feedback from participants regarding their satisfaction with the services provided in the CGU-AJC.

Local Memorandum of Understandings

- The roles and responsibilities of the partners in the state MOU must be integrated as part of the local MOU.
- Local MOUS shall specify these roles and responsibilities, as well as WIOA provisions, final rules, guides, and policies issued by the state.
- Local MOUs are an integral part of the state memorandum.

Terms and Economic Conditions

Partners must develop a financial plan, including the terms and conditions for subsidizing the services and operating costs of the one-stop center. The goal of having an operational budget is to develop a subsidy mechanism as follows.

1. Set and maintain the local workforce development system at a level that meets the needs of job seekers and the business conditions of the Local Board
2. Reduce duplication and maximize the use of resources and technologies
3. Expenses are appropriately shared by determining the center's proportional use and benefits received, and all funds are used only for permissible activities under the WIOA.
4. The budget includes the following cost categories required by WIOA and its regulations:
    a) Infrastructure Costs

b) Career Services
c) Operator Costs
d) Shared Services

5. All costs shall be included in the Infrastructure Funding Agreements (IFA), distributed according to the proportional use and relative benefits received by the partner, quarterly reconciled against current expenses, and adjusted to the budget accordingly.
6. The operating budget of the UGC-AJC must be transparent, and all partners must negotiate in good faith and pursue reasonable and fair outcomes.

Cost Allocation Plan (CAP)

1. The Cost Allocation Plan (CAP) is a method for identifying direct and indirect costs and supports the distribution of costs among partners.
2. Costs in the CAP will be classified as Direct and Indirect Costs.
3. Cost pool must be determined and then distributed by partners.
4. Costs considered in the CAP include Infrastructure Costs, Human Resources-Related Costs, Non-Personnel Costs, Additional Costs, Services, Operating Costs, and Shared Services.
5. In the CAP, costs must be assignable, permissible, and reasonable.
6. The CAP should indicate the basis for calculating the costs to be allocated to each partner.

AJC Financing

Accepted financing mechanisms are the Local Financing Mechanism and the State Funding Mechanism, as established by TEGL 17-16, Infrastructure Funding of the One-Stop Delivery System.

Miscellaneous Clauses

1. The state MOU also includes the conditions for Revision, Amendments, Dispute Resolution, and Impasses
2. The state MOU must be reviewed and renewed within a period of not less than three (3) years, to ensure adequate cost subsidies and delivery of services.
3. The current MOU revision began in PY 2021.

Public Policy on Sexual and Labor Harassment, Alcohol-Free and Drug-Free Environment

The AJC partners will seek and train their resources in the AJC, to comply and ensure that the policies related to Sexual and Labor Harassment are meet, as well as public policies on Alcohol and Drug-Free Zones

Non-Discrimination Policy

MOU partners and staff representing them in the AJC shall not discriminate against applicants, complainants, participants, and staff of the programs in the AJC CGU based on race, color, gender, age, religion, birth, origin or ethnic identification, political ideology, physical or mental disability, socioeconomic status, having been victims of domestic violence, veteran status, sexual orientation, gender or marital identity of the parties, genetics, immigration status as an immigrant legally admitted and authorized to work in the US or to participate in any subsidizing program or activity under WIOA Title I, and will take affirmative action to prevent such discrimination.

MOU Dispute Resolution Process

Include a process to resolve disputes among the partners.

Complaints Process between Partners

Include a process to resolve complaints among the partners.

> (D) *Coordination, Alignment and Provision of Services to Employers.* Describe how the entities conducting the respective core programs, any Combined State Plan partner program included in this plan, and 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 Employer Engagement Committee of the State Board and the Workforce Development Program of the DEDC are leading the process of developing the Business Service Unit at State Level and lead to the development of the Statewide Business

Services Framework Plan to guide the LWDBs and the AJC to collaborate with businesses. The DEDC contracted the consulting firm Premier Financial Services PSC to conduct this process.

The Plan will provide a broad framework to guide the local areas to create skilled business service teams that will be able to build credible relationships and provide worthy services that will benefit businesses. Wagner-Peyser staff will be an integral part of this effort.

In addition, the firm will assist the DEDC and State Board in developing and implementing strategies for layoff aversion. These strategies are aimed at business service teams to develop relationships with employers in their local areas, use the networks of the private sector employers on their local boards to expand their contacts and to provide information on industry trends, identify potential red flags, develop other sources of early information on potential issues within their local areas, and develop responses to address identified issues.

Every Local WDBs has its own Employer Engagement committee, composed of business representatives. These Committees will help develop teams, provide guidance and recommendations, ensure professional development, establish specific goals for teams, and track progress.

DEDC will also contract a consultant to evaluate the AJC brand among employers. The consultant conducts qualitative and quantitative assessments of the AJC local brand among employers. Interviews will be conducted with employers to discover employers' awareness, perception, and usage of AJCs. The assessments are followed by recommendations to improve services and increase awareness of available services, increase brand awareness, maintain brand awareness, rollout of the new plan, and development of an outreach plan.

The goal of the Employer Engagement Committee and the DEDC is to increase employer participation rates, including repeat customers, and to increase the retention rates of employees placed into employment by AJCs. This rate would help raise employers'

confidence in the workforce and lead to increased employer engagement.

Apart from the strategies mentioned to improve and increase the use of patrons of AJCs services, the AJC network can assist employers with recruitment, interviews, and hiring services.

Services to employers include the following:

- Interviews and screening of job candidates to select skilled and trained personnel who will fulfill their labor force needs,
- Labor market information,
- Membership in the State, local boards, working groups, sector partnerships, employers' committees, among other entities, to intervene in policymaking for education, training, and employment in the local, regional, and statewide levels,
- Use of the One Stop Center network and systems to disseminate job offers; and
- Incentives, subsidies, follow-up, and supportive services to employees, including initial services to obtain Health and Drug Testing, criminal records, and required certifications for prospective employees.

Employment Service staff:

- Issue employer certifications, denials, or notices of invalidation for tax credit on a timely basis,
- Maintain a system and procedures to regularly monitor the activities initiate appropriate corrective actions,
- Manage agreements with TANF and NAP in Puerto Rico serving the majority of WOTC applications, which are from participants of the TANF or NAP programs and train staff from these programs,
- Maintain the current cooperative efforts with employment and training organizations already working with the private sector, such as Veterans organizations, Job Service Employer Committees, and local boards, to inform

employers about requirements for the use of the federal tax incentive known as Work Opportunity Tax Credit (WOTC),

- Train, as appropriate, State, and participating agency staff and provide monitoring and technical assistance to these agencies, and
- Engage in outreach efforts to obtain more qualifying employers to use the tax credit program and increase the number of certifications.

(E) *Partner Engagement with Educational Institutions and other Education and Training Providers.* Describe how the State's strategies will engage its 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 WDP at these institutions.

As previously discussed, the State Board will coordinate with the PRDE's State Board for Career and Technical Education, the PRDOLHR, the education services industry, and the effective delivery of occupational education for high-demand, mid- and high-skilled, and/or technologically advanced occupations.

The State Board will assume its convening functions under WIOA to leverage the resources and concert the support of the Education Council, the PRDE, IHEs, and CTE institutions to adopt a common framework to support the implementation of career pathways and to further the alignment of the educational and workforce systems. Educational institutions will also be engaged as providers of educational and training services and will be critical to the successful implementation of the Registered Apprenticeship program. The system will develop and deploy a training program to educate AJC staff about how to work with structured work-based learning programs. In addition, the design of this framework will contribute to collaboration on pre-apprenticeship programs developed in response to industry demands.

Regarding services for students with disabilities, Act 51-1996, as amended, mandates coordination between the PRDE's Special Education Program and the PRVRA, among other agencies, with the purpose of ensuring a seamless transition of young people with disabilities to post-secondary education. The PRVRA intervenes in the process of transition before eligible students with disabilities graduate from or exit the school system and facilitates the insertion of training programs and post-secondary educational institutions. The PRVRA sponsors such training in various accredited educational institutions to acquire the knowledge and occupational skills necessary for the workplace.

In terms of serving individuals with barriers to employment, along with basic adult education, the PRDE's CTE program is key to meeting the workforce development needs of the correctional population. Please refer to Sections III(A), (2), and (B) for additional information regarding coordination with the Carl D. Perkins program.

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

As required under the WIOA, the State maintains a publicly accessible list of eligible training providers and their eligible training programs, including relevant performance and cost information. The State Board adopted procedures for the initial determination of eligibility and the subsequent certification of training providers.

When issuing a determination, local boards are required to:

- Analyze the impact of economic, geographic, and demographic factors and the characteristics of the populations served by applicants, including their difficulties accessing or providing services, if any.
- Determine the occupations for which they are requesting training services, which are those in demand in the geographic region covered by the local board.
- Keep the process of initial eligibility determination open throughout the year.

- Establish eligibility criteria, requirements for additional information, and minimum performance levels for providers of training beyond what is required by the State Board, which might be applicable to a specific local area.
- Safeguard the confidentiality of personally identifiable information of any education records, including the circumstances related to prior consent, and comply with the provisions of the Family Educational Rights and Privacy Act (FERPA).
- Periodically invite public and private educational institutions and community-based organizations are periodically invited to submit applications for initial or subsequent eligibility determination as providers of training for occupations in demand.
- Regarding apprenticeship programs, promote the automatic inclusion of providers in the State List after a request is made by a registered provider under the provisions of the Registered Apprenticeship Act and enabling State provisions.

Exceptions made by Registered Apprenticeship and One-Stop Centers' operators are required to collect performance information and determine whether the providers meet the performance criteria. Providers who meet these criteria are considered eligible training service providers.

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

The Department of Economic Development and Commerce (DEDC) serves as the umbrella entity for key economic development agencies in Puerto Rico. Created in 1994, the DEDC is at the leading edge of Governor’ s policy of taking the most out of Puerto Rico's fiscal autonomy as a tool for promoting local and foreign investment. This vision allows thousands of jobs to be created in manufacturing, aerospace, telecommunications, information technology, engineering services, scientific research, and others.

To achieve these strategic goals, the DEDC is working on initiatives that:

- Create new tax and economic incentives for high-technology industries, start-ups, and locally owned businesses.

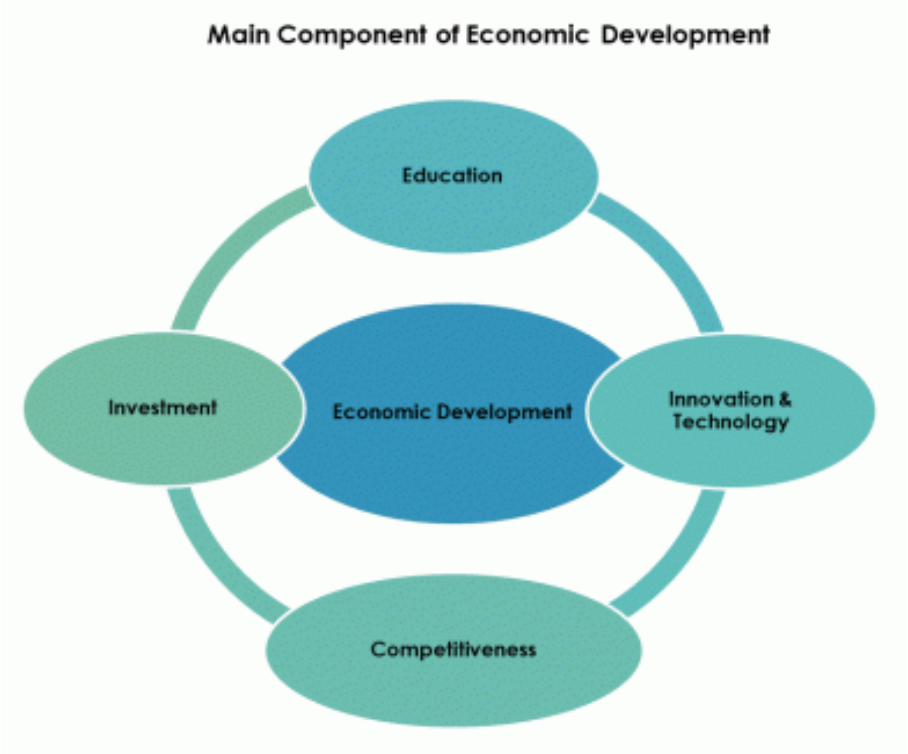
- Improve Puerto Rico's regulatory and structural framework to enhance its competitiveness as a destination for investment and production of high-value goods and services.
- Establish regional centers, or "poles," of economic activity throughout the island; and
- Grow critical sectors, including manufacturing, tourism, commerce and exportation, film and visual arts, banking, and insurance.

Main Components of Economic Development

Puerto Rico's education must be transformed to foster a maximum level of innovation and technology that enables us to be globally competitive, and thus reach the desired level of local, national, and foreign investment that allows the export of goods and services. Education: System Transformation and Skills Promotion.

The education system is an essential component and a key for economic development, so there is a need to continually calibrate and align curricula and teaching methodologies to ensure that they address the needs of local and international industries, and that we help professionals in the workforce to reinvent themselves, as they need.

Figure __. Main Component of Economic Development



Innovation: Solid Ecosystem for Entrepreneurship

To establish a healthy and sustainable ecosystem of innovation, it is fundamental for entrepreneurship projects to respond to market needs. PRDEDC will provide Technical and Financial Assistance in areas such as Market Needs, Applied Research, Incubators Startups, Accelerator Startups, Substitution of Imports of Goods and Services.

Competitiveness: Structural Reforms

1. Structural Reforms: Labor Permits Tax Energy
2. Eliminate the Requirement for Electronic Export Information (EEI)–Elimination of the federal requirement for export, achieving an equal treatment for transactions to and from the Island be more agile at a lower cost.
3. Incentives Code
    a. Consolidates and rationalizes all economic incentives in a single code.
    b. Establishes a uniform process for granting incentives.
    c. Focus the resources on the incentives with Return of Investment

Investment: Tools and Opportunities

A. Federal Programs
    a. New Market Tax Credits
    b. EB-5 Program
    c. Foreign Trade Zones
    d. Insert PR in US treaties to avoid double taxation
B. State Initiatives
    a. Invest Puerto Rico
    b. Destination Marketing Org. (DMO)
    c. Incentives Code
    d. Infrastructure Plan
C. Investment Opportunities
    a. Public Private Partnerships

b. Science City

c. Roosevelt Roads Redevelopment

d. Port of Las Americas

Efficient and effective use of incentives

a. Exports of goods for niche markets

b. Exports of services

c. Substitution of imports

d. Supply chain associated with exports and substitution of imports

e. Establishment of small businesses and start-ups

SMEs: Programmatic Commitments for Economic Development

1. Innovative SMEs
    a. Designation of 10% of the Special Fund for Economic Development (FEDE) to provide contributory incentives to SMEs that foster innovation in the economic sector.
2. Maletín Empresarial de la Mujer
    a. Program focused on supporting those Puerto Rican women who wish to develop in the business world, mainly in the areas of technology and innovation.
3. Additional Initiatives
    a. Master Entrepreneurship
    b. Business Intelligence and Entrepreneurship System
    c. Entrepreneurship in Functional Diversity population
    d. From School to Business

e. SME Food Sector

STRUCTURAL REFORM

- Act 1-2017 – The Participative Public Private Partnerships Act. Strengthens the P3 legal framework to facilitate critical infrastructure investments and improve public services.
- Act 4-2017 – The Labor Transformation and Flexibility Act. Amends labor laws with the intention of improving labor market competitiveness, improving the labor participation rate, and halting the migration of citizens to external labor markets.
- Act 8-2017 – The Act for the Administration and Transformation of Human Resources in the Government. Allows the transfer of workers across the Government to save $100 million through mobility and attrition.
- Act 13-2017 – Enterprise Puerto Rico Act. Creates a not-for-profit corporation to promote the economic development of Puerto Rico, attract foreign direct investment and incentivize investments in technology in collaboration with the private sector.
- Act 17-2017 – Act to Promote Puerto Rico as a Destination. Enables the creation of a destination marketing organization (DMO).
- Act 18-2018 – Reforms, simplifies, and expedites the permitting process to improve the quality and efficiency of processing requests for all permits, licenses, inspections, complaints, certifications, consultations, or any other authorization that affects the operation of a business in Puerto Rico, including those issued by municipalities.
- Act No. 47-2021 - PR Minimum Wage Act - Puerto Rico has enacted the Minimum Wage Act, Act No. 47-2021, increasing the Island's minimum wage from $7.25 to $8.50 effective January 1, 2022. Additional increases will take

effect on July 1, 2023, when the minimum wage will be raised to $9.50, and potentially on July 1, 2024, when it will reach $10.50, unless a mandatory decree alters the increase. Act 47-2021, enacted on September 21, 2021, establishes as public policy the periodic revision of the minimum wage to bring it in line with the cost of living and to ensure that people earn enough to meet their basic needs.

Panel Consensus (Technical Assistance): The narrative must fully describe all core programs or discuss their relationship to economic development.

WIOA is designed to provide access to employment, education, training, and support services to job seekers, match the requirements of employers and have the skills and abilities necessary to compete in the global economy. WIOA partners continue to work collaboratively with economic development stakeholders to support a shared strategic vision of the state's workforce and economic development systems. Building and strengthening the workforce is a key economic development priority for the Governor. Core and required partners are at the forefront of economic recovery by enhancing alignment among the state's education and workforce system through access to employment, training, and support services.

DECC is the state agency that leads economic development efforts for PR and is responsible for the Workforce Innovation and Opportunity Act (WIOA) Title IB and Trade Training Program activities. Also is responsible for the administration of the required and allowed Governor's Statewide Workforce Activities as outlined in WIOA

DEDC is the Title I grantee, and thorough the WDP, implements services for youth, adults, and dislocated workers. Its main function is to establish an economic development strategy for the island, engage business and industries, promote the best conditions for investment, and maintain a unified approach to job creation, retention, and business expansion. In the workforce development system, oversee title I subgrantees use of funds, guide the local and regional planning process, monitoring the delivery of services in Local Areas. DEDC will also connect the core and required partners with the latest economic development initiatives in the state.

Wagner-Peyser plays an important role in Economic Development strategies, as its main function is to improve the functionality of the labor market at the national level. This is achieved by matching people in search of employment with employers in search of qualified people to fill their jobs. Therefore, Wagner-Peyser plays an important role as it provides the business sector with the necessary and qualified workforce to fill the vacant positions of employers.

PRDLHR Bureau of Statistics disseminates state and local labor market data to inform policy development and decisions made by WIOA core programs and LWDBs, in support of economic growth, targeting regional and local targeted industry sectors. The LMI provides data and information to individuals, workforce professionals, researchers, and economic development professionals. The LMI System provides a foundation for workforce analysis, research, and strategic planning. Reports are available by region and local area, such as workforce analysis reports, including employment and industry/occupation projections that will enable workforce partners to plan and coordinate their efforts more effectively.

The Department of Education of Puerto Rico (DEPR) is the eligible agency for adult education and literacy programs under AEFLA. The Assistant Secretary for Alternative Education-Adult Education Program (AEP), State Director for Adult Education, is the implementation unit for these programs.

The Adult Education Program (PEA) aims to promote, facilitate, and expand educational and employment opportunities for adults through funds from Title II: Adult Education and Family Literacy Act. Through these services, educational opportunities are offered to youth and adults aged 16 and older who are not in school and wish to start or continue their education or qualify for employment. These educational services are offered through eligible providers under competitive proposals.

PEA Goals are:

1. Use the best scientifically valid teaching practices based on the Adult Education Program curriculum, its Content Standards and Expectations to meet performance indicators.
2. Strengthen the data collection and reporting process to support and promote continuous program improvement.

3. Expand educational opportunities for adults, including those with special needs.
4. Assist the adult population 16 years of age or older in achieving reading, writing, and comprehension skills in English.
5. Develop partnerships and implement strategies aligned with the State Board and Local Workforce Development Boards to expand access to employment, education, and other services for individuals with barriers to employment.

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

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

State Operating Systems & Policies

To promote efficiency, an integrated service delivery model, and continuous improvement, DEDC has updated/drafted the following policies:

- Co-enrollment policy (WIOA & Wagner-Policy) with customer flow chart
- One-Stop Certification Policy
- One-Stop Operator Procurement
- Local Board Recertification Policy
- Local Area Performance Policy
- Adult Priority of Service Policy

Workforce and labor market information systems

The workforce and labor market information system (WLMI) established under Section 49l-2 of the Wagner-Peyser Act is administered by the PRDOLHR. The Department also maintains a Bureau of Labor Statistics and a Research Division on Occupational Skills and administers the Occupational Employment and Wages

Survey, the Nonfarm Employment Survey, and special surveys, studies and research. The products are readily available at http://www.mercadolaboral.pr.gov/.

The PRDOLHR maintains a WLMI that is fully accessible for a range of customer groups, including job seekers, employers, and policymakers. State and local industry and occupational employment projections are maintained for the long-term (10 years) and short-term (2 years), as well as for statewide and sub-state levels. The State uses the Local Employment and Wages Information System (LEWIS) to derive staffing patterns for sub-state projections.

As required by the USDOL, the PRDOLHR also produces a statewide annual economic analysis report, which is an essential tool for strategic planning for WIOA and other workforce programs. The report provides information and analyses that can support workforce planning and the process of making policy decisions for workforce development, education, economic development and business engagement in sector strategies and career pathway initiatives.

The plan proposes to continue coordination with federal data producers to ensure Puerto Rico is included in reports, series, surveys, and statistical products that are available for other state jurisdictions and are accessible through USDOL websites. Among other, these include the following products:

- Longitudinal Employer-Household Dynamics (LEHD). LEHD links employees and employers' records from an array of data sources (administrative records, demographic surveys and censuses). LEHD's principal product is its Quarterly Workforce Indicators (QWI), which include employment, job creation, monthly earnings, and worker turnover data by locale, as well as by the industry, gender, and age of workers. Although all 50 states, the District of Columbia, Puerto Rico, and the U.S. The Virgin Islands have joined the LED Partnership, and the LEHD program has not yet produced public-use statistics for Puerto Rico.
- Business Dynamics Statistics (BDS). Provides annual measures of business dynamics (such as job creation and destruction, establishment births and

deaths, and firm startups and shutdowns) for the economy, aggregated by establishment and firm characteristics.

- County Employment and Wages (QCEW). BLS produces this series from the Quarterly Census of Employment and Wages (QCEW) program. Wages represent total compensation paid during the calendar quarter, regardless of when the individual worked during that quarter.

- USDOE's State Assessment of Adult Literacy and State and County Estimates of Low Literacy. The SAAL is conducted in conjunction with the National Assessment of Adult Literacy (NAAL). Puerto Rico is not included in this report.

  The Department of Education uses the Statewide Longitudinal Data System (SLDS) for K- 12 levels throughout its jurisdiction with a clear component of the WLMI system that provides increased visibility of data in the systems of primary and secondary education. The objective of the SLDS is to contribute to improving education policy and operational decisions using data related to students' achievements over time. It also aims to establish the mechanisms of organization, policies, procedures, systems, and human resources necessary to perpetuate their use by those interested in education at all levels. An immediate result was to help improve the ability to identify young people outside school who need services from the workforce system.

The system integrates data from the Student Information System of the DE (SIE, for its acronym in Spanish), which collects information on all students enrolled in the public education system, the Financial Information System (SIFDE, for its acronym in Spanish), data from the Special Education Program, and data on students who are Spanish learners, among other data.

The Adult Education Program is integrated into the Data Management Committee, which coordinates the integration of the data collected in the Adult Information System (AIS) in the access portal of the longitudinal system. This has facilitated access to the data of the program and to improve the capacities for the

presentation and analysis of the data necessary to support the decision-making process.

The Education Council collects, analyzes, and disseminates detailed data on K-12 educational institutions, vocational and technical institutions and IHEs. Data available at: https://agencias.pr.gov/agencias/cepr/inicio/estadisticas_e_investigacion/Pages/default.aspx.

DATA, COMMUNICATION AND CASE MANAGEMENT SYSTEMS

Participant Record Information System (PRIS)

The Puerto Rico database system is the Participant Record Information System (PRIS), which was entered on March 9, 2020. Technology solutions include common registration and case management across Title I and Title III programs. The software solution for WIOA workflows follows the Training and Employment Guidance Letter (TEGL) 05-16, and WIOA Participant Individual Record Layout (PIRL).

In compliance with Section 116(d)(1) of WIOA and related federal guidelines, the system consists of a multiuser web-based software based on the PIRL, including the validation rules established by DOLETA and reports related to the PIRL database. Its main function is to comply with the three sets of validation rules (duplicate rules, valid values rules, and logical rules) reflected in the generation of 100% error-free comma delimited text files (csv files) based on the PIRL schemas for all programs. The software was developed according to the PIRL Schemas CSV files and will be used by the 16 programs included in the PIRL.

In the initial phase of the PRIS system, Title I–B programs and W-P programs were fully integrated. The Workforce Development Program is in the final stages of development to streamline the application process for integrating or interfacing the

participant management systems of WIOA Titles I, II, III, and IV and other required partners.

The implementation of the new software for data collection and information management expected results are:

- Improved Service Delivery and Employment Outcomes for Dislocated Workers;
- More Effective Connections to All Available Services through Integrated Case Management;
- Preventing Long-Term Unemployment
- Increased Early Intervention and Layoff Aversion;
- Increased Accessibility to Services through Automation and Self-Service; and
- Enhanced Identification of Service Delivery Needs.

The PRIS collects and reports on performance measures for Title I and Title III programs. Currently, ETA 9169 for PY 2019 and PY 2020 were submitted and certified by WIPS.

The main challenge for submitting ETA 9169 and 9173 reports was migration from the former database to the new platform with the required elements of the PIRL. This migration produced thousands of data errors, which required an analysis effort to identify the data and complete the required fields. Additional data elements that were added under WIOA, which were not collected in the developed software under WIA parameters, were the main source of PRIS errors. However, with the collaboration of the partners and the staff of the Local Board, it was possible to develop a work plan to enter the data, correct the errors reported by the WIPS, and finally submit the ETA 9169 reports for PY 2019 and PY 2020.

PR did not submit the performance reports required by WIOA regulations since the implementation of the Act. Negotiation with Region I and ETA allowed PR to present with priority the reports of PY 2019 and PY 2020. We will present soon the

execution reports for AP 2017 and AP 2018 so that our jurisdiction would comply with the WIOA reporting.

The PRIS is in the process of upgrading, the database and reporting phase have already been completed, and the vendor is working to expand the capacity of the PRIS with the following additional modules:

- Case Management – The case management module is a supplemental tool to facilitate the collection of data from case managers in the AJC, currently in the process of implementation in PRIS. Its design was made through the input of a sample of case managers, WP and WDP staff. The module is in the stage of performing QA and user tests to upload it to the platform.

- Eligible Training Providers Module – This module electronically integrates the entire process for eligible training service providers to: submit documentation to the Local Boards of trainings eligible for WIOA funds; allow the Local Board process for evaluating and approving recommended training in accordance with occupational demand; as well as the evaluation at state level and the creation of the ETPL. The module collects the ETPL performance data elements required in ETA 9171.

- Registered Apprenticeship Module – This module is in the process of QA and user testing to proceed to be uploaded to the PRIS. In addition, the required elements of the PIRL contain additional data fields to collect information relevant to case management and will be aligned with the RAPIDS database.

- Youth Module Module – This module collects information from service providers of the 14 elements of the youth program from the local areas and state level.

- Rapid Response Module – Collects information from dislocated workers receiving rapid response services.

AJC Partners Integration

One of the main goals of the workforce development system is the integration of all core and required partners in the AJC for common intake, common case management, supportive services, and avoiding duplication of services. The WDP hired an IT vendor to develop the integration of the databases of the core and required partners of the system. The main challenge is assessing each partner's IT architecture, some of which has their own database platforms and confidentiality requirements. This initiative seeks that the PRIS can be used by the required partners as their database platform and share relevant information from other partners to avoid duplication of services and to track clients through their participation.

The WDP and partners have already begun the process of outlining the process of integrating services, including databases, which is in the stage of initiating the evaluation of the partners' IT infrastructure. This work will support the objectives of integrating and reporting the results of the entire workforce system.

The WDP and State Board began to bring together all required and non-required WIOA partners. The inclusion of partners on this platform will allow for a more effective system. DEDC must establish data-sharing agreements with each partner willing to be integrated in the system, either by sharing the data or by achieving an interface to share customer participation information. This will improve both client services and reporting with respect to data analysis and client activities. The intent of this process is to gather comprehensive and consistent information so that appropriate workforce development services will be provided. Common intake and case management will help coordinate and align services provided through the workforce development system and will ensure that those needing services through the workforce system receive appropriate services.

State Wage Interchange System (SWIS). Puerto Rico signed the SWIS Agreement with DOLETA, which incorporated all six WIOA core programs to exchange interstate quarterly wage records. Since January 1, 2020, all Queries for Wage Data for all

applicable programs have been processed through the SWIS Clearinghouse. The SWIS Agreement replaces the Wage Record Interchange System (WRIS and WRIS2) Data Sharing Agreements previously executed by most States. States signing the Agreement will be able to exchange interstate quarterly wage records with any other State signing the Agreement to satisfy performance reporting requirements in section 116 of the Workforce Innovation and Opportunity Act (WIOA).

The PR Department of Labor & Human Resource is the SUIA agency. "SUIA" is the state agency that holds wage data, whether such agency also administers the state's unemployment insurance program. On the other hand, PACIA" is the Performance Accountability and Customer Information Agency designated by the governor to be responsible for coordinating the state's program for assessing state and local program performance and evaluating training provider performance. The PACIA are PR Department of Economic Development & Commerce – Access PACIA; PR Department of Education – Access PACIA; PR Department of the Family – Access PACIA; and the PR Vocational Rehabilitation Administration – Access.

MIP. The Accounting Information System (MIP) is used by the WDP to keep accounting data on WIOA federal funds allocated to local areas, as well as disbursements to participants and providers and administrative and operational concepts of expenditure. All local boards (15) provide the data required by the system regardless of the use of internal financial information systems.

Claimants' Services Web Portal. The system allows an unemployment insurance claim to be filed online. Users can file an initial claim for unemployment benefits if they have worked in Puerto Rico for at least two-quarters within the last 18 months and become unemployed for reasons beyond their control. Any application submitted after 5pm, from Monday to Friday, will be processed on the next working day. Time required to complete the application should not exceed 30 minutes. Also, claims are accepted by phone at (787) 945-7900, a service available during regular working hours.

National Reporting System (NRS)- The Puerto Rico Adult Education data collection reporting system uses the NRS designed to help providers collect, analyze, and use data to identify and implement strategies to achieve expected levels of performance. Current efforts are focused on PRIS integration, which will strengthen compliance with NRS requirements.

Consumer Rehabilitation Information System (CRIS). PRVRA maintains a Consumer Rehabilitation Information System. It keeps data on services provided to applicants and consumers and the data required for federal and state reporting. CRIS is not currently integrated with PRDOLHR or the One-Stop systems. The case management capabilities of the system have been updated to collect data on Pre-Employment Transition Services delivered to students with disabilities.

Job Banks. PR.JOBS is the official Job Bank of the PRDOLHR. This resource, available to employers and job seekers in general, is provided free of cost by Direct Employers as part of an agreement with the NASWA to provide a valuable tool to State Workforce Agencies. Direct Employers Job Central is a web clearinghouse operated by Direct Employers, where employers can post available jobs and recruit eligible job candidates; job seekers may also search for job openings and apply for employment.

Job Central uses the O*NET Autocoder to assign occupational codes. Direct Employers uses a version that has been upgraded extensively since the original and will not recode jobs uploaded from a state workforce agency site unless they have a valid SOC/O*NET code assigned.

Upon registration in PR.JOBS, a job seeker will have access to a vast network of employers and can publish their resume online and gain access to skills transferability tools such as MyNextMove and MySkillsMyFuture. A registered employer will find a network of jobseekers in search of employment and can search their resumes online to match their job opportunities and allow them to extend an invitation for an interview that is totally transparent to the job seeker.

RAPIDS. Registered Apprenticeship data are entered into a USDOL database called the Registered Apprenticeship Partners Information Data System (RAPIDS). In addition, we have an electronic Apprenticeship module that communicates with the USDOL's WIPS system to report on program performance. We are working with the ETA Regional Office to achieve the interface between the two systems.

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

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.[10]

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

The PRIS is in the process of upgrading, the database and reporting phase are already completed, and the vendor is working to expand the capacity of the PRIS with the following additional modules, as described in the previous section:

- Case Management
- Eligible Training Providers
- Registered Apprenticeship Module
- Youth Module
- Rapid Response Module
- ETPL Module

The WDP hired an IT vendor to develop the integration of the databases of the core and required partners of the system, seeking that the PRIS can be used by the required partners as their database platform and share relevant information from other partners to avoid duplication of services and track clients through their participation. The WDP and partners have already begun the process of outlining

the process of integrating services, including databases, which is in the stage of initiating the evaluation of the partners' IT infrastructure. This work will support the objectives of integrating and reporting the results of the entire workforce system.

The expected results are as follows:

- Improved Service Delivery and Employment Outcomes for Dislocated Workers;
- More Effective Connections to All Available Services through Integrated Case Management;
- Preventing long-term unemployment
- Increased Early Intervention and Layoff Aversion;
- Increased Accessibility to Services through Automation and Self-Service; and
- Enhanced Identification of Service Delivery Needs.

NRS. The Adult Information System complies with the regulations and requirements of the Adult Educational System and manages the required federal reporting for the NRS. Title II is expected to join the PRIS as an additional module through an agreement.

Vocational Rehabilitation Services. The PRVRA system collects data for the RSA-911 and other federal and local reports. Whereas WIOA sets new performance indicators for the program, CRIS will be undergoing adjustments in programming, so that data can be recorded as needed to measure compliance. Currently, the CRIS is not integrated into the system of other core programs or the One-Stop center network.

Panel Consensus (Compliance) The narrative must describe the data collection and reporting process for Title II. There is little information about the NRS. In addition, if title II is included in the PRIS, there is no information on when this will be implemented and how title II will collect and report with the PRIS system.

Description of the Adult Information system at PRDE-ADP (PEA)

The PRDE-AEP reporting process is as follows:

- The AEP implemented an Adult Information System (AIS) with the purpose of maintaining accurate participant data and continuous improvement in data quality. Training in the platform use is offered to service providers' center directors through workshops focused on key issues such as how to gather and save data, data quality validation, data usefulness to demonstrate service effectiveness, performance level standards negotiated with NRS and follow-up to performance indicators.

- Additional technical assistance is provided through phone calls and e-mails. Issues are also addressed through the Adult Information System (AIS) call center. This effort is implemented at central AEP offices to guide local providers in the daily operations of data collection for adult education activities.

- The Adult Information System (AIS) is also used to continue reviewing local activity data gathering on educational functioning level gains and the number of participants post-tested. This review process allows the program staff to thoroughly assess program operations.

- The AIS is also used to analyze the reported performance data. To perform this analysis, the process conducted at the State and local levels is based on the data collected by the service providers and uploaded to the Adult Information System (AIS) at the AEP central level. A detailed data review and validation of each data indicator is performed by the central office. The specific identified anomalies are checked for corrections. The errors, when identified, are resolved by telephone calls and discussion of the raw data indicators with the education centers directors, teachers, and counselors at each center.

Panel Consensus (Technical Assistance): The narrative should include a timeline of when titles II and IV may be included in the PRIS system.

Database integration among core partners began on PY 2021. The most time-consuming task within the work plan established with the vendor is the analysis of the information infrastructure (IT) because each core program has a different technology architecture. The goal is not to share the entire database, as there is a lot of confidential and sensitive information of the participants, but to share the relevant information of delivery services that help co-enrollment, improve the delivery of services, and avoid overlapping. The partners agreed that this integration could be completed by the third quarter of PY 2022.

(2) State policies that 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 State Board will review its policies to comply with the requirements of WIOA. To bring all practices into compliance with WIOA and other federal regulations, the PRDEDC and the State Board have the following policies or guidance:

State Policies and Procedures

1	DEC- WIOA- 01- 2021	Policy to comply with the Sunshine Provision for Local Board activities under the Workforce Opportunity and Innovation Act WIOA
2	DDEC-WIOA-02-2021	Procedure for subsequent designation and re-designation of local areas - To provide guidance and process for the designation and subsequent designation of Workforce Development Areas.
3	DDEC-WIOA-08-20	Case Management and Record-Keeping Policy

4	DDEC-WIOA-04-20	Guidelines to the process of certification, recertification, and decertification of Local Boards
5	DDEC WIOA-RR-02-20	Public Policy to allocation of funds for COVID Prevention
6	RESOLUCION NUM 01-2021	State Board Resolution No. 01-2020 to Temporary Jobs
7	DDEC-WIOA-11-20	Financial Reports - Close-Out Reports
8	DDEC-WIOA-10-20	Payroll Cost Allocation Policy - Guidelines and procedures for payroll base on budget
9	DDEC-WIOA-09-20	Cost allocation and fund reimbursement
10	DDEC-WIOA-07-20	Procedure for the follow-up service required by WIOA for participants of the Adult, Dislocated Worker, and Youth Programs
11	DDEC-WIOA-06-20	TAA Definition of eligible displacement area
12	DDEC-WIOA-05-20	TAA Training - Requirements when approving Trade Adjustment Assistance (TAA) Training funds request.
13	State Board Rule	Internal Rule of the State Board
14	WIOA-03-20	WIOA-03-20 - Policy for the Competitive Selection of Eligible Youth Service Providers
15	DDEC-WIOA-02-20	DDEC-WIOA-02-20 - Technical Assistance Guidelines to 14 elements of youth program - Guide to define concepts, eligibility, and other aspects related to the youth program

16	DDEC-WIOA-RR-01-20	Policy for COVID-19 Layoff Aversion Fund
17	Waiver Policy	Operational Procedure for Implementing the Waiver for Business Capitalization
18	State Board Sanctions	Policy to establish the procedure for the determination of WIOA rules violations and the imposition of state board sanctions
19	Carta Circular DDEC-WIOA-04-2021	Faculty of local areas to pay a summer bonus as part of fringe benefits to their employees
20	WIOA 01-2017	Policy to the development of Memorandum of Understanding MOU with AJC partners
21	WIOA 2-2017	Guideline to the Competitive Selection of One Stop Center Operators - American Job Center
22	WIOA 03-2017	Circular Letter on Public Policy and Requirements for Publicity, Transparency, Openness and Disclosure of Local Board Affairs
23	WIOA-03-2021	Prohibition of the total closure of the One Stop Centers (OSC) during the administrative closures decreed by the municipalities
24	DDEC-WIOA-02-2022	Policy related to allowable expenses to travels paid with WIOA Funds
25	TBD	Establish the roles and responsibilities of the actors involved in the fiscal and programmatic areas in the One-Stop Center.

26	Draft pending State Board Approval	Policy to provide guidelines regarding the Work-based Training, including On the Job Training, Customized Training, Incumbent Workers Training, and Registered Apprenticeship
27	TBD	Priority of Services to youth, adult, and dislocated workers programs

MOU and IFA policy

The WDP developed the public policy **WIOA- 01-2017**, **a Process to Develop the Memorandums of Understanding**, issued on April 24, 2017, distributed to the presidents of the Local Boards, CEO, and Partners of the AJC. It establishes the legal basis and process for Local Boards and partners to negotiate memorandums of understanding. The policy entitled **Guide to the Preparation of the Infrastructure Financing Agreement (IFA) and Resource Allocation** was prepared using as reference the *TEGL 17-16, Infrastructure Funding of the One-Stop Delivery System*. The WIOA-01-2017 policy sets the parameters for negotiation and the content that the agreement should have. The development of local memorandums is based on the state agreement signed by the grantees of the partner programs of the system.

The policy includes legal reference, definitions, purpose, MOUS content, stages of the negotiation process, roles and responsibilities, and guidelines for the development of an infrastructure costs agreement. The next section summarizes the most relevant information regarding this policy.

The purpose of the MOU is to provide information on the relationship between the Local Board, the AJC Operator, and the One-Stop System's partners. The Local Board and the partner negotiated the MOU to ensure that the following WIOA principles are implemented:

1. Universal Access: All clients, including those with barriers to employment, will have access to job search, training, and occupational services in all AJCs and will also be provided with

information leading to decision-making targeting career development and the employment market.

2. Service in the One-Stop System: All clients can explore career development and job preparation services and access information on employment opportunities.

3. Individual Choice: Customers will be able to choose from a variety of careers, skills, employment, and training information to obtain the services and skills they need to increase their employability opportunities based on individual needs, which will be nurtured by the advice and escape of CGU-AJC staff.

4. Regional Development: Create a labor development system that promotes the regional labor market's skills and improves the economic development of the Region and Local Area. Services such as commas, tax credits, incentives, and labor market information must be accessible within the UGC-AJC.

5. Cost-efficiency: All customers must have access to a system that minimizes costs and promotes the participation of employers and job seekers who use the system so that services do not double.

6. WIOA emphasizes full and active collaboration, good-faith negotiation, and the best agreement between the parties regarding services, costs, resources, and other provisions related to the best and most efficient Single Gestion System, which is required by law and other applicable regulations.

MOU must contain at least the following information:

1. Description of the services to be provided through the AJC, including how those services will be coordinated and provided.

2. A fiscal plan on how the costs of services and system operation will be subsidized, including infrastructure, operational, and hared costs.

3. Methods for referral of individuals between the operator/ is of the UGC-AJC and partners for the service and activity concerned.

4. Methods to ensure that the needs of workers, youth and individuals with barriers to employment, including individuals with disabilities, are addressed through the provision of appropriate services, including access to technology and materials available in the UGC-AJC.

5. Description of the reports that each partner must produce under the program/agency regulation it represents concerning the services it provides in the UGC-AJC, who and how he will be responsible for collecting and submitting the required information.

6. Description of the services to be provided through the AJC UGC, including how those services will be coordinated and provided.

7. Duration of MOU and procedures for amending and/or reviewing it.

8. Guarantees that each MOU will be reviewed, at least every three (3) years so that appropriate funds are allocated and the provision of services is ensured.

9. MOU must be updated in a period of no more than three (3) years to reflect any changes in signers and cost sharing.

10. If a partner using the process described in section 678.750 of the WIOA Final Rule appeals to the determination of the assigned infrastructure cost, resulting in a change in the WIOA's contribution to infrastructure costs, the MOU must be updated to show such a determination.

11. The determination of the format that the MOU will have is of the Local Board, also complying with the requirements set out in section 678.500 of the WIOA Interpretative Regulations and with any other provisions by the State.

12. The MOU may contain any other provision agreed upon by the parties, which must be consistent with WIOA Title I and its Regulations, Laws and regulations related to programs administered by partners and other applicable legal regulations. Such additional provisions may not contravene the provisions of this Circular Charter.

Availability of Career Services and Employer Services

1. Basic career services will be universally available to the entire population.
2. Each partner is responsible for providing services that correspond to the program or agency they represent.
3. Career services are detailed in section 678.430 of the Final Rule. Section 678.435 describes the services available to employers in the AJC.
4. Employers' services fall into two main categories:
    a. Participation and Commitment- Educate and provide general information to employers on how the services in the AJC can represent solutions to their challenges or needs in terms of the employment of qualified personnel.
    b. Business Services- develop customized strategies based on their profile to determine the needs of employers in a way that addresses the challenges related to Recruitment, Employment, Training, Closures, and Layoff
5. Multi-barrier Employment Population Services - Partners must ensure that services are available to individuals with barriers to employment.
6. Continuous Improvement and Duplication of Service
    a. All partners will participate in the process of programmatic review and continuous improvement to offer the best services, avoid duplication, and consider an innovative approach to the delivery of services.
    b. Partners will participate in the day-to-day development and improvement of the system's procedures, policies, operational administration and the Single Management Center.
    c. To ensure that services are responsive to community needs, partners will interview customers for feedback related to satisfaction with the services and care provided

at the CGU-AJC. Tools will be developed to measure continuous improvement and avoid service duplication.

- Evaluation Sheet–to be administered to all AJC staff, including partners, every three months. This Evaluation Sheet shall consider, among others, the delivery of services and referral processes.
- Customer Service Survey- which will be administered every three (3) months by the AJC Operator to participants. To do this, the operator will choose a statistical sample corresponding to 35% of the total daily average participants.
- The results of these tools will be used to measure the effectiveness and efficiency of AJC processes and services.
- Performance Measure - All partners will work together to achieve and exceed the Performance Measures negotiated with DOLETA.
- The AJC operator will report on the progress of these measures, and all partners will discuss alternatives to mutually achieve performance, negotiate rates, and share responsibility.
- Common Operating System- All partners will integrate into the common operating system for the acquisition of information, evaluation, referral and monitoring of participants in the UGC-AJC.
- Priority of Service: All employment and training programs or partners, subsidized with federal funds, and administered by AJC partners, will observe a preferred system for people with disabilities, veterans, pregnant women, people over 65, and other priority population. Employment and training opportunities must be provided to such a population and/or other eligible persons, as established by federal and State laws and federal policies applicable to the grants.

Infrastructure Funding Agreement (IFA) and Resource Allocation Guidelines

Infrastructure Funding of the One-Stop Delivery System (AFI) and Resource Allocation Agreement Guidelines were prepared using TEGL 17-16, Infrastructure Funding of the One-

Stop Delivery System. The WIOA-01-2017 policy sets the parameters for the negotiations of the one-stop center cost allocation. The allocation and distribution among AJC core programs and infrastructure costs are governed by WIOA Section 121(h), its Final Regulations, and the Federal Cost Principles contained in the Uniform Administrative Requirements, Principle Costs, and Audit Requirements for Federal Awards of 2 CFR Part 200 (Uniform Guidance).

1. All programs must contribute to infrastructure costs and certain additional costs, comma required by 20 CFR 678,700 and 678,760, 34 CFR 361,700 and 361,760, and 34 CFR 463,700 and 463,760, respectively. Under federal cost principles, a member's contribution must be reasonable, necessary, and assignable to the program.

2. The Guide describes the governor's responsibilities, the State and State board, the Local Board, CEOs, and partners to determine infrastructure costs and their roles in the development of Local Financing Mechanisms (LFMs) and State Financing Mechanisms (MFS).

3. All costs incurred in the operation of the AJC must be allocated in compliance with federal cost principles and by using an accepted cost allocation methodology. These methodologies should be described in an Infrastructure Financing Agreement (IFA), in which each Local Board must submit to the State along with the Memorandum of Understanding and the Local Plan.

4. The IFA must be certified and approved by the AJC Operator and each required and optional partner.

5. Consistent with 20 CFR 678,755, 34 CFR 361,755 and 34 CFR 463,755, IFA must include the following elements:

    a. the validity of the IFA (which may differ from that of the MOU);

    b. identification of the infrastructure cost budget, which is a component of AJC's operational budget;

c. identification of all AJC partners, the CEO(s) and the Local Board participating in the IFA;

d. a description of the process for periodic review and modification to ensure equitable benefits between partners in the agreement;

e. information on the Local Board's measures, the CEO(s) and the core partners to reach consensus or ensure that the Local Area followed the state financing process (SFM);

f. a description of the process to be used among partners to resolve infrastructure financing issues during the MOU's duration, in cases where no consensus is reached.

Infrastructure Financing Mechanisms

Infrastructure costs can be financed through two methods: the Local Financing Method (LFM) and State Financing Method (SFM). The LFM method allows flexibility for the Local Board and partner programs to establish the design and allocation of funds through consensus. The intention of the LFM to make a good-faith effort to reach agreement in the development of an AFI. On the other hand, SFM is thinking about it as an alternative when the required consensus between the Local Boards and partner programs is not achieved.

AJC Operational Costs

The AJC budget should contain a base budget that is based on the individual budgets distributed in two types of costs specifically described in the Rule: (1.) the Infrastructure Costs, defined in WIOA's 121(h)(4); and (2.) the Additional Costs, which consist of operating costs and cost of shared services that are related to the operation of the AJC (but do not constitute the infrastructure costs), are described in Section 121(i) of WIOA. Specific references on infrastructure costs can be found in sections 20 CFR 678,755, 34 CFR 361,755, and 34 CFR 463,755

1. Infrastructure Costs -Infrastructure costs are defined as the overall operating costs of the AJC, not related to the payment of human resources (salaries, or marginal benefits, among others), and may include the rental of physical facilities, utilities and maintenance, equipment (including products related to evaluation and technological assistance for persons with disabilities) and technology to facilitate access to the JJ (including planning activities and candidate search (outreach)) and may include the costs associated with establishing the identifier American Job Center (AJC) and related materials, as defined in Uniform Guidance 2 CFR 200.94, necessary for the operation of the center. Include:

2. Non-personnel costs - Non-personnel costs are all costs that are not compensation for personal services

3. Personnel costs-. In contrast to non-personnel costs for the one-stop system, personnel costs include salaries, wages, and fringe benefits of the employees of partner programs or their sub-recipients, as described in 2 CFR 200.430 (Compensation – personal services) and 2 CFR 200.431 (Compensation – fringe benefits) of the Uniform Guidance.

4. Additional Costs- One-stop partners must share in additional costs, which must include applicable career services, and may include shared operating costs and shared services necessary for the general operation of the one-stop center

5. Career Services - One-stop partners must ensure that at least some career services, described in WIOA sec. 134(c)(2), are provided at the one-stop center.

6. Shared Operating Costs and Shared Services- One-stop partners may also share other costs that support the operations of the one-stop centers and the costs of shared services. The costs of shared services may include initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other one-stop partners, and business services (WIOA sec. 121(i)(2), 20 CFR 678.760, 34 CFR 361.760, and 34 CFR 463.760, respectively).

Funding Types and Sources.

Funding for infrastructure and additional costs, such as shared costs and services, may be in the form of: (1) cash, non-cash, and third-party in-kind contributions; (2) funding from philanthropic organizations or other private entities; or (3) other alternative financing options, as described in WIOA Sec. 121(c)(2)(A)(ii) and 20 CFR 678.715, 34 CFR 361.715, and 34 CFR 463.715. Infrastructure funding may be from funds classified as administrative, program, or both, depending on the requirements of the partner program.

Uniform Guidance – Federal Cost Principles

Any cost paid with federal grant funds must comply with Subpart E, Federal Cost Principles of the Uniform Guidance at 2 CFR Part 200. The Federal Cost Principles, applicable to one-stop partners that are federally funded, provide general guidance for developing cost allocation methodologies and determining if contributions towards infrastructure costs and additional costs are necessary, reasonable, and allocable to their program based on the relative benefits received. Additionally

Proportionate Use

Proportionate use refers to a partner program contributing its fair share of the costs proportionate to: (1) the use of the one-stop center by customers that may include reportable individuals and participants in its program at the one-stop center; (2) the amount of square footage occupied by the partner program in the one-stop center; or (3) another allocation base consistent with the Uniform Guidance.

Relative Benefit

The process of measuring the benefits of a program must use reasonable methods and is related to the benefits received by the partner at the center.

Partner Programs with Multiple Grant Recipients

In this situation, each contracted grant recipients must contribute to infrastructure

Cost Allocation

Cost allocation is based on the premise that federal programs must have an equitable proportion of cost-sharing based on the benefit received by each program.

1. Definition of Allocation of 2 CFR 200.4

It is the process of assigning a cost or a cost group, to one or more cost objectives, in reasonable proportion with the expected benefit or other equitable relationship. The process can involve assigning a cost directly to a final cost goal, or through one or more intermediate cost goals.

2. Assignable Cost

The 32 CFR 200,405 details the criteria for determining assignable costs under a federal program.

3. Allocation Methodologies.

In the development of the methodology, the partners: (1) determine the infrastructure costs budget and the budget(s) for additional costs, which must include career services and may include shared services and shared operating costs for a particular comprehensive one-stop center; (2) determine which methodologies are reasonable and acceptable; and (3) from the acceptable methodologies, select the methodology (or methodologies) that will be applied to the different cost categories. Partners should focus on identifying methodologies that most effectively allocate costs based on proportionate use and relative benefits received by the partners.

4. Allocation Bases

When costs cannot be directly assigned to a final cost objective, they are placed in a pool that will be allocated later to the benefiting partner programs.

5. Inputs

The inputs are the most commonly used allocation bases for the resources used in a process, activity, or service. Using inputs, the cost is allocated at the same time it is incurred and usage must be documented. Examples of input bases include: (1) staff time allocated on the basis

of timesheets and time distribution records; (2) facilities allocated on the basis of square footage; (3) accounting services allocated on the basis of transactions; and (4) equipment or supplies allocated based on usage.

6. Outputs

Departments consider outputs to be the result of an activity or service. Examples of output allocation bases include: (1) participants and reportable individuals under a specific program; (2) number of customers who are obtaining employment after self-directed job search; and (3) number of customers receiving a specific career service.

Basic Cost Allocation Principles

1. Allowable Costs

To be allowed, a cost is necessary and reasonable for the proper and efficient administration of the program. To reduce the risk of expense accumulation and be responsible for unintended costs, the planned program expenses, terms and conditions of the delegation of funds, and applicable regulations should be carefully reviewed before incurring any cost of a program.

2. Reasonable Costs

For a reasonable cost, it must not exceed the costs incurred by a prudent person under the same circumstances. To determine the reasonableness of a given cost, consideration should be given to:

1. Whether the cost is of a type generally recognized as normal and necessary for the operation of the organization or the management of the assignment.
2. The requirements or restrictions imposed by factors such as generally accepted business practices, state and federal laws, regulations and terms and conditions of the allocation
3. If the individuals and/or parties concerned act prudently within the circumstances, taking into account their responsibilities to the organization, its members, employees, customers, the general public and public interest.

4. Important deviations from established organizational practices can unreasonably increase operating costs.

3. Assignable Costs

For a cost to be assigned to a given cost objective, other costs incurred for the same purpose must be treated as being constantly treated in similar circumstances. Any cost assignable to a particular fund, grant, assignment, or other cost objective, under these principles, may not be changed to other federal grants or allocations to cover funding deficiencies, to avoid restrictions imposed by law or assignment contracts, or for other reasons.

However, this prohibition is not a limitation on cost changes that are allowed under two or more allocations under existing agreements within the programs.

4. Benefits

Benefit measurement is a critical requirement and a central task to be performed under a cost distribution. Costs are assignable to a particular cost target considering the expected benefits from that cost goal

When direct benefit measurement cannot be performed efficiently and effectively, it is appropriate to group this type of cost into a cost pool and subsequently make a distribution. The allocation basis should be the mechanism used to allocate combined costs (pool) to final cost targets. Partners must be careful that the selected base does not distort the expected results.

Cost Allocation Plan (CAP)- Method for Documenting Cost Allocation

The CAP is the method by which an organization identifies, group, and distributes the direct and indirect costs allowed in grants and contracts. Accounting records are the evidence required to justify all expenses included in a cost-sharing plan. The CAP must include at least the following elements:

1. An organizational chart that identifies all partners, type of services and staff functions

2. A description of the types of services and programs delivered at the center.

3. A copy of the official budget that includes all the costs to operate the AJC
4. A description of the methods used in allocating expenses for each cost objective that includes the following:
    a. A narrative description of the methodology for the allocation of expenses for each cost objective
    b. An overview of direct costs and cost types,
    c. A list of indirect costs, pool costs, basis for the allocation of each pool cost type, and supporting documentation for each allocation base.
    d. A summary of the allocation of the costs of the core services allocated for the operation of the AJC
    e. A certification from the AJC operator that the cost allocation methodology has been prepared in accordance with the guidelines and instructions given by the State. If the AJC wishes to certify your PAC, you can use a certification statement developed by the Local Board.

Factors to Develop a PAC

1. Simple- use the most straightforward and least expensive method possible, based on a measure to calculate the relative benefit are expected to receive, which can produce an equitable allocation of costs between programs.
2. Replicable- the process that unfolds must be replicable at any time
3. Consider Available Resources- it is essential to consider the structure and capabilities of the accounting system in the design of a cost allocation process.
4. Make changes wisely- Making changes to the CAP that result in a retroactive redistribution of costs to the cost objective would be permissible only when the change results in a more equitable distribution of costs. Such changes in the allocation methodology must be received by the necessary, justified, and documented prior approvals.

Example of a Cost Allocation Process

The Guide includes a practical example showing cost estimates based on square feet, pool cost objective of physical facilities, number of expected participant's equipment costs, and wages.

Certification of the AJC Infrastructure Financing Agreement

1. It is a matter of certifying that in the CAP, the included expenses are correctly allocated in accordance with the rules and regulations established for the use of WIOA funds
2. Costs presented in the CAP have been duly negotiated and reviewed for AJC's partners, and they are fair and reasonable, considering the contribution of each partner to the operation of the center and the provision of services.
3. It includes the signature of the people responsible for negotiating the CAP and the date of certification of the agreements.

AJC Partners Integration

One of the main goals of the workforce development system is the integration of all core and required partners in the AJC for common intake, common case management, supportive services, and avoiding duplication of services. The WDP hired an IT vendor to develop the integration of the databases of the core and required partners of the system. The main challenge is assessing each partner's IT architecture, some of which has their own database platforms and confidentiality requirements. This initiative seeks that the PRIS can be used by the required partners as their database platform and share relevant information from other partners to avoid duplication of services and to track clients through their participation.

The WDP and partners have already begun the process of outlining the process of integrating services, including databases, which is in the stage of initiating the evaluation of the partners' IT infrastructure. This work will support the objectives of integrating and reporting the results of the entire workforce system.

The WDP and State Board began to bring together all required and non-required WIOA partners. The inclusion of partners on this platform will allow for a more effective system. DEDC must establish data-sharing agreements with each partner willing to be integrated in the system, either by sharing the data or by achieving an interface to share customer participation information. This will improve both client services and reporting with respect to data analysis and client activities. The intent of this process is to gather comprehensive and consistent information so that appropriate workforce development services will be provided. Common intake and case management will help coordinate and align services provided through the workforce development system and will ensure that those needing services through the workforce system receive appropriate services.

The PRIS is in the process of upgrading, the database and reporting phase have already been completed, and the vendor is working to expand the capacity of the PRIS with the following additional modules:

- Case Management
- Eligible Training Providers Module
- Registered Apprenticeship Module
- Youth Module Module
- Rapid Response Module

J-PAL North America State Innovation Initiative Grant

WDP won the 2021 J-PAL North America State and Local Innovation Competition and will receive a $50,000 grant from the non-profit Abdul Latif Jameel Poverty Action Lab, North America office (J-PAL NA). J-PAL was founded in 2003 at the Massachusetts Institute of

Technology (MIT) by professors Abhijit Banerjee, Esther Duflo and Sendhil Mullainathan, in order to transform the global vision, we have to effectively combat global poverty. J-PAL NA will provide technical assistance and $50,000 in funding to develop a robust case management system to provide better services focused on Puerto Rico's workforce development. WDP approach is intended to raise enrollment and then measuring their effect on enrollment statistics and further downstream outcomes. Targeted research questions and hypotheses about potential interventions to support the Local Areas fall broadly into two categories:

- 1) Why is take-up low?
- Hypothesis: Services/trainings are not aligned with local needs to help clients transition from welfare to work
- 2) What is the best way of improving client outcomes?
- Hypothesis 1: Improve the quality and effectiveness of caseworker services and support
- Hypothesis 2: Provide soft skills training with the intent to improve job readiness and job-seeking outcomes

WDP have identified two possible interventions that can leverage this under-enrollment phenomenon and are likely to have an impact both on services take-up and on client outcomes: Intervention 1: Improve job-coaching, job promotion and case management services; Intervention 2: Improve training alignment. The primary outcomes expected to change by interventions are: (i) participation in WIOA programs, (ii) and employment status and earnings two and four quarters after receiving Job Center services, (iii) credential attainment, (iv) measurable skill gains, and (v) effectiveness in serving employers measured through retention, repeat business, and employer penetration rate. We can use our own administrative data and Puerto Rico Department of Labor data linked through data sharing agreements.

(3) State Program and State Board Overview.

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

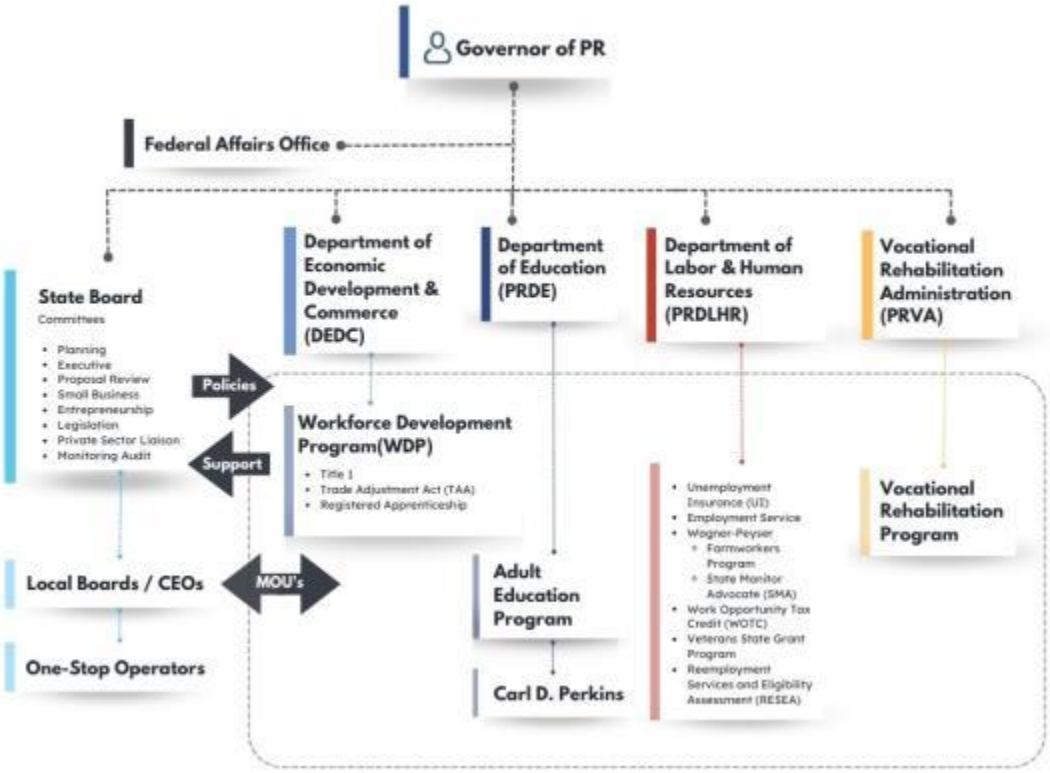
Panel Consensus (Compliance w/TA): The narrative includes an organizational chart, but it's unclear if the chart represents all core programs. Also, there is no description of how each state agency is organized and the delivery system at the State and local levels. The organizational chart is also difficult to read. Puerto Rico must also include an organization chart and provide a description for all core programs. Also, Puerto Rico must include information on how the VR agency (PRVRA) is organized.

Core programs are under three departments of the Government of PR, Department of Economic Development and Commerce, Department of Education, and Department of Labor and Human Resources. The organization charts below show the overall design of the workforce development system and the specific design of the four departments, with their respective programs.

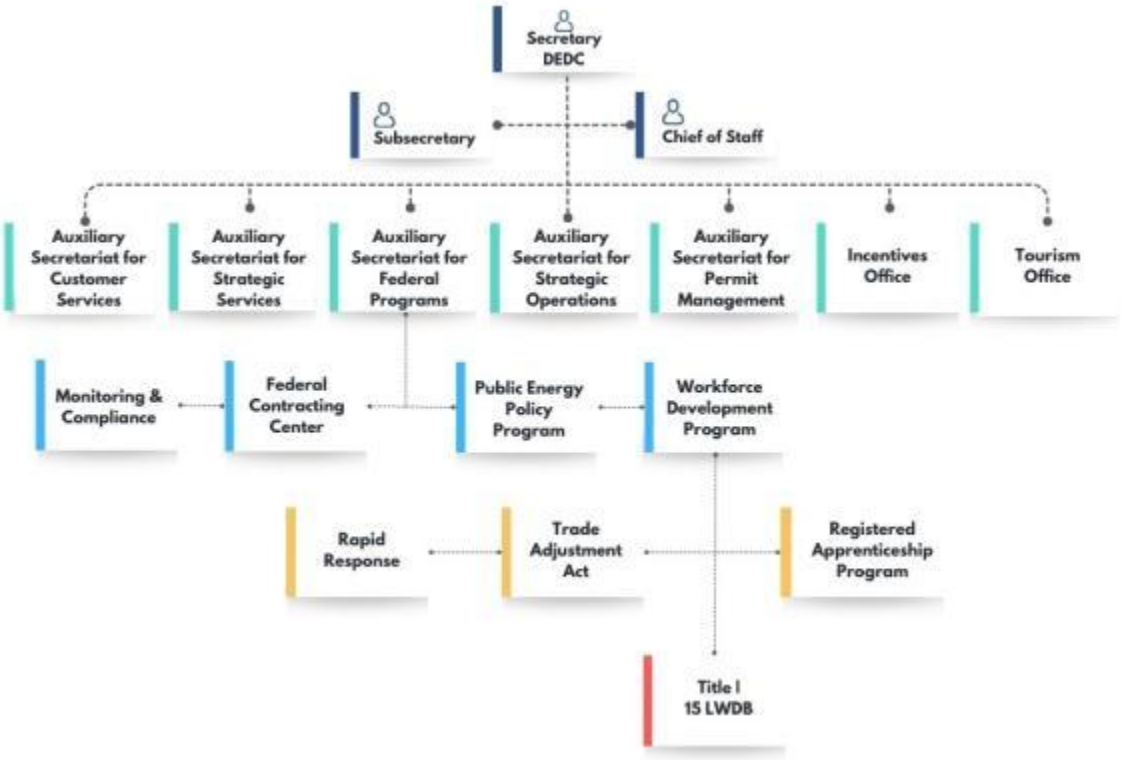
The first organizational chart shows the integration of the four core programs under the direction of the governor of PR, as a grantee of Title I, Title II, Title IV, and RAV; the participation of the state board in the development of public policy; the operator of the one-stop centers and their relationship with the programs. It also shows the participation of the WDP, as a programmatic entity of the state board and the process of interaction between the programs through the Memorandums of Understanding. The following diagrams show the organizational structure of each state department, with its units related to the workforce development system.

Subsection II. a. 2., Workforce Development, Education and Training Activities Analysis, *above, include a more details breakdown of core programs and their respective units, entitled State Administered Workforce Programs by WIOA Type. The following chart is presented in a simple design and with complete and official program names to facilitate readers.*

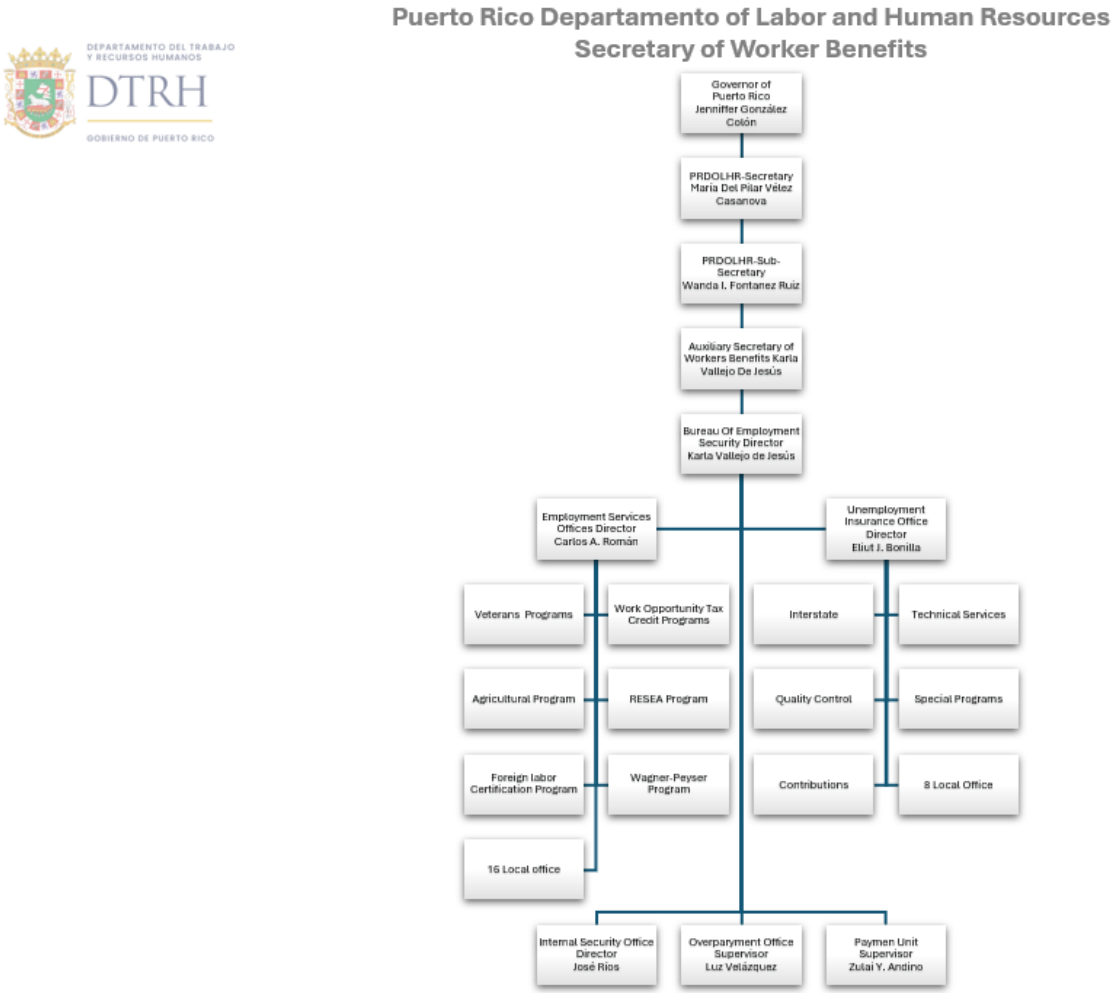
Analysis of Workforce Development



DEDC Organization Chart



PRDE Organization Chart



VRA Organization Chart

VRA is made up of an Operational Policies Area and an Administrative Area

1. *Operational Policies Area: This area is responsible for developing policies for officials who offer direct service and will serve as the liaison for these units at the Central Level. These units include: the Office of Vocational Rehabilitation Counseling Services (OVRCS), the Office of Assessment and Adjustment (OAA), the Office of Employment Support and Modalities (OESM), the Office of Quality Control and Program Management (OQCPM), and the Office of Pre-Employment Transition Services (OPTS).*
2. *Administration Area: it oversees formulating, reviewing, advising, and facilitating compliance with administrative regulations that comply with applicable laws and*

regulations, allowing the development of decentralized administrative procedures and promoting agile and expeditious services. In addition, it formulates, coordinates, and supervises the implementation of the public policy required and authorized by the Administrator. It establishes the operational and administrative processes in the Budget, Finance, Purchasing, Documents and General Services Divisions.

(B) *State Board.* Provide a description of State Board activities that will assist State Board members and staff in conducting State Board functions effectively. In addition, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

Table __- PR State Workforce Board Members

The Governor of Puerto Rico signed a new executive order (OE-2022-034) establishing the State Workforce Development Board in accordance with the requirements of WIOA sec. 101 and 20 CFR § 679.110. As a result, a new SWDB was instituted effective September 2022. The Executive Order establishes a greater emphasis on Apprenticeship Program representation by requiring three representatives from this sector.

The composition of the SWDB is as follows:

State Workforce Development Board (WIOA)

NAME	COMPANY/ORGANIZATION	AFFILIATION
Jennifer González Colón (Frances G. Ortiz Molina)	Commonwealth of PR	Governor (Representative)
Angel Peña Ramírez	State Representative	House of Representatives
Iveliz Morales Correa	State Senator	Senate Representative
Juan A. Alvarado Zayas Administrator & Co-Founder	Alvarado Tax & Business Advisors	Business
Johanne Pagán Mercado	Advantage Insurance	Business

NAME	COMPANY/ORGANIZATION	AFFILIATION
Head of Human Resources		
Sonia E. Navarro González, President	Fina Consulting Group	Business
Carl R. Levya Ramos, Principal Associate	Carl Leyva & Associates, Corp.	Business
Umberto J. Donato Solis, President	DDD Group	Business
Elizabeth Alonso Quiñones. Vice President	Hidroponistas de Puerto Rico	Business
Luis Alvarado Cintrón, President	EIS Consulting Group	Business
Teresita Santiago Lebrón, Chief Executive Officer	El Morro Technologies, LLC	Business
Bettina Mercado, President	Bettina Cosmetics	Business
Astrid Méndez Leon, Human Resources Manager	Boston Scientific	Business
Humberto Zacapa, Senior Executive	SNC Technical Services, LLC	Business
Joscan Feliciano García, CEO	Puerto Rico Industries for the Blind	Business
Melissa Rivera Roena, General Manager	Manpower Group	Business

NAME	COMPANY/ORGANIZATION	AFFILIATION
Irba M. Batista Cruz, President	Bonafide Retirees Chapter of the Central Federation of Workers	Labor
Bryon Silva, Training Director /Apprenticeship Coordinator	LIUNA-PR District Council	Labor
Alma Frontera Colon, President	Boys & Girls Club of PR	Labor
Osvaldo Ubinas Nieves, Director	Ramey Job Corps	Labor
Sebastián Negrón-Reichard Secretary	PR Department of Economic Development & Commerce	Government
María Del Pilar Vélez, Secretary	PR Department of Labor & Human Resources	Government
Eliezer Ramos Pares, Secretary	Department of Education	Government
Dr. Rosa Lugo Cabán Administrator	Vocational Rehabilitation Administration	Government
Vacant		Chief Elected Official
Vacant		Chief Elected Official

Note: Board vacancies are pending Governor's appointments.

ii. Board Activities

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

The development of the plan is a task that the State Board accomplishes with the collaboration of, and interagency committee integrated by core and required partners and a year-round working agenda. The role and responsibilities of the State Board are defined by WIOA, local statute and its internal regulations. The latter establishes subcommittees and working groups in connection with technical and specific issues. Among these: Strategic Planning and Budget Committee; Private Sector Liaising Committee; Evaluation, Monitoring and Auditing Committee; Entrepreneurship Committee; Continued Improvement Committee; and the Executive Committee.

The State Board is also responsible for assisting the Governor with additional functions designated by WIOA. These include:

- Developing and implementing the State Unified Plan and performance measures;
- Developing/expanding strategies for partnership in in-demand sector/occupations;
- Developing and aligning policies;
- Developing and continuously improving the one stop delivery system; and
- Developing policies and guidance on one stop partner role and resource contribution.

Panel Consensus (Technical Assistance): The narrative includes a list of responsibilities. This section would strengthen if Puerto Rico included the activities that facilitate these functions instead of listing the parts. Also, it would have been helpful if Puerto Rico documented the Board's decision-making processes to ensure the development of strategies to support career pathways for individuals with disabilities and how they will ensure technology is accessible to individuals with disabilities residing in remote areas.

The Puerto Rico State Workforce Development Board (PRSWDB) meets at least four times a year, either in person or by videoconference. These meetings provide opportunities for the PRSWDB to address issues impacting the state network, guide and create strategic policy, obtain performance information, and oversee funding initiatives. Decisions are made by a vote of a majority of the total serving member of the PRSWDB. Decision-making votes shall be conducted according to Robert's Rules of Order. All decisions and initiatives are developed to foster inclusivity and collaboration of

all stakeholders to strengthen our workforce system. Educational and informational portions of meetings are conducted according to the preference of the Chair. The state board's executive committee assists and expedite the work of the state board, and meet separately, in person or by videoconference, as scheduled and at the request of the Council Chairman. The executive committee evaluates reports from WDP and makes recommendations to the state board regarding the allocation of workforce development funds within the state board's purview.

Duties include, but are not limited to:

- overseeing the implementation of the strategic plan,
- tracking workgroup plans and progress
- leading the alignment of the workgroups
- Advocates for efficiency and cooperation among stakeholders
- Oversees strategies to foster education about career opportunities and businesses about services and resources available to help them meet their workforce needs.
- Makes recommendations to the Governor on geographic designations and alterations for workforce development areas.

One of the priorities of the PRSWDB is to foster information technology functions focusing on achieving technological integration with the partners of the Labor Development System and availability online as appropriate and addressing the need for more responsive career information — tied to the eligible training provider list, and on data systems. This will drive better coordination of services across the system and support process and outcome metrics as part of the performance functions. Another priority for the PRSWDB is performance. The performance functions will focus on continuous improvement and how they contribute to achieving the PR State Unified Plan goals. The performance system will look at process and outcome measures focusing on interim gains and outcomes related to the state board's WIOA performance common measures and other necessary areas.

The executive committee meets monthly; among the works they do, they work with staff to guide and oversee the preparation and submission of the WIOA State Plan, preparation and submission of an annual report, and other oversight functions. The Executive Committee is empowered to meet on an interim basis between regular full Board meetings and make emergency or time-sensitive decisions on behalf of the full PRSWDB membership when necessary as it relates to the explicit duties or responsibilities of the PRSWDB as the state's designated state workforce development board under WIOA. Immediate notification to the entire Board will occur if the Executive Committee ever taken any action without the entire board's prior consent. Actions taken by the Executive Committee on behalf of the PRSWDB that require official approval by the entire board are brought forward for approval at the next regularly scheduled meeting of the board. The Executive Committee shall monitor the work of other Board committees and the Board staff, develop, and approve agenda items for the entire board's meetings, work on legislative issues, and develop policy proposals for the entire board to consider for approval. The PRSWDB Executive Committee, Planning Committee, other standing committees, and any task forces or other working groups established by the PRSWDB Chairperson also meet throughout the calendar year to produce policy recommendations or reports to be considered by the full PRSWDB for approval.

The Planning Committee is a standing committee of the PRSWDB that reviews, recommends, and approves the necessary reports, information, and all requirements under the functions listed above. State agency staff members provide subject matter expertise, data, information, and recommendations to the committee. Committee members are members of the PRSWDB who represent business and industry, state agencies, education, and community-based organizations.

The planning committee works closely with state agency staff during the development of the WIOA State Plan and reports regularly to the executive committee and entire board.

The Innovation and Trends Committee will oversee developing strategies to support career pathways for hard-to-reach individuals with disabilities.

Board Staff — The PRSWDB staff shall be attached to the DEDC for administrative and staff purposes. The PRSWDB may ask for assistance from other units of state government as it requires to fulfill its duties and responsibilities.

Support career pathways for individuals with disabilities

The PRDE-AEP has under implementation a career pathways intensive program that guides its activities under nine components written strategic plan:

1. Building Strategic Partnerships,
2. Creating a Career Pathways Culture,
3. Analyzing LMI
4. Integrating Career Pathways in Onboarding
5. Creating a Student Education and Career Plan
6. Intensive Advising
7. Providing Instruction in a Career Pathways Model
8. Support Services
9. Sustainability for Continuous Improvement

During 2021-2022 over 50 service providers, 50 counselors, and 50 conversational English teachers have been trained in career pathway plan development for each education center in a 6-week workshop program with a national expert as host and the Puerto Rico Department of Education Adult Education Program (PRDE-AEP)

The strategy involves the implementation of the memorandum of understanding with the 15 local workforce development boards and their One-Stop Centers.

Initiatives VRA

1. Obtain advice from the Advocacy Office for People with Disabilities to help the One-Stop Centers (American Job Centers) continue compliance with accessibility policies to benefit persons with disabilities. Also, that Office offers technical assistance with accessibility guides according to the current legislation.
2. Evaluate the public policies of the American Job Centers to offer recommendations.

3. VRA advice for the American Job Center of Guaynabo, Puerto Rico, to acquire tests and instruments to assess the interests, aptitudes, academic skills, and learning styles of the population with disabilities.

4. VRA collaboration with the American Job Centers to use the Accessibility Study Form of our agency, provide guidance about their content and the implementation using the VRA Occupational Therapists' expertise.

5. VRA will provide the staff of all American Job Centers a Workshop on Sensitivity towards the Population with Disabilities, emphasizing blindness, deafness, and physical impairments.

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

(A) *Assessment of Core and One-Stop Program Partner Programs.* Describe how the core programs will be assessed each year based on the State performance accountability measures described in Section 116(b) of the WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed annually. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local areas or providers. State assessments should consider the local and regional planning goals.

The respective administrative State agency will do an assessment of core programs. Core programs are assessed each year based upon actual performance relative to federally required negotiated performance levels in the state and local areas. Performance assessments are conducted quarterly and annually through data validation and compliance with WIOA requirements and subsequent reporting to USDOL and USDOE.

The State Board meets regularly throughout the year with an agenda to assess performance and expenditure in LWDB. At the end of each quarter, the WDP prepares a report on the performance rates and expenses levels, which is sent to the CEO and the President of the Local Board. These

reports are used in monthly meetings with all local workforce development boards to show how each LWDB is performing against its locally negotiated targets for each measure and rate of expenditure. In addition, state-level teams provide technical assistance to local boards on any performance issues.

DEDC Programmatic Monitoring Unit conducts annual participant file reviews and monitoring of the WIOA Adult, Youth, and Dislocated Worker programs in the 15 LWDBs. These reviews ensure the LWDBs adhere to federal and state program requirements and provide appropriate services. In addition, a formal written monitoring report identifying best practices, areas of concern, and findings resulting from the review are generated upon completion of each review.

The guidance provided in "Procedimiento para la Determinación de Violaciones y la Imposición de Sanciones de WIOA", provides for consequences to local boards in situations indicating a pattern of low performance, and programmatic and financial deficiencies found during quality assurance monitoring reviews.

Title I-B

The State will continue to assess the program based on the results of fiscal and programmatic monitoring, customer satisfaction surveys, and the analysis performance and accountability measures.

Adult Education

Section 212 of WIOA requires a description of how the eligible agency will evaluate annually the effectiveness of adult education and literacy activities based on the performance measures described in section 116. The evaluation will address the extent to which local providers have implemented each of the thirteen required activities specified in Section 231 and will focus in two key features: a formative evaluation is conducted to assure quality of program management by tracking the effectiveness of program development and implementation; followed by a summative evaluation that documents the educational impact on learners, and determines the extent to which populations specified in the State Plan are served.

The project staff, together with the evaluator, design and formalize the evaluation plan. The evaluation tasks are divided into the following tasks:

- Documenting the project's implementation process;
- Periodically aligning program elements with program goals;
- Monitoring outcomes and impact;
- Following-up on studies of former participants;
- Measuring the effectiveness of teacher training; and
- Assessing the extent to which adult education goals and objectives of individuals with barriers to employment and ensuring their access, and other special populations have been met.

The evaluation plan will yield both quantitative and qualitative data, needed to assess the efficiency and effectiveness of the program's functions and services. The program evaluator will utilize a combination of strategies, which include but are not limited to Pre and post inquiries; Surveys; Interviews; Standardized tests; Placement tests; Attendance records; Observations; and Questionnaires.

The product of the evaluation will include:

- Applicable information about the effectiveness of the Section 231 grant program
- Characteristics of the adult learners
- Improvements in literacy levels and educational gains of learners
- Analysis of learner goal attainment
- Outcomes of performance standards
- Services provided

The outcome reports will include the new requirements of the National Reporting System (NRS).

Pursuant to Section 116 of the Adult Education and Literacy Act, each local provider must report student progress measures obtained from all students who have attended at least twelve (12) hours of instruction in programs receiving Section 231 federal supplemental funds. The evaluation activities will require local providers to:

- Collect and analyze student performance and program improvement data;
- Determine performance levels on standard and core indicators;
- Identify needs and support services; and
- Implement continuous improvement initiatives to meet performance levels for standards and core indicators.

Documented progress of student performance measures must include at a minimum:

- Literacy skill level improvements in reading, writing, and speaking the English Language, English language acquisition, problem solving, numeric, and other literacy skills;
- Placement in, retention in, or completion of post-secondary education, training, or unsubsidized employment or career advancement;
- A secondary school diploma or its equivalent; and
- Attainment of student learning goals.

All participating local providers will be required to maintain individual student records for all students who have attended 12 hours of instruction. Each record must contain:

- Student identification and Intake information;
- Demographic data;
- Attendance data;
- Assessment data;
- Attainment data; and

- Other relevant information as specified by the data management system.

Monitoring of providers

The Puerto Rico Department of Education Adult Education Services continues to promote its comprehensive accountability system to determine program effectiveness and measure the progress of local providers towards continuous improvement. The agency reviews program delivery strategies, processes, and evaluation data in order to support and improve the literacy services provided and to optimize the return of the investment of federal funds in adult education literacy activities.

Monitoring processes include risk monitoring to determine that the allocated funds are used efficiently; monitor files to validate that local programs meet the eligibility criteria of the participants; and programmatic and fiscal monitoring. Said monitoring activities will be carried out each school year, in order to demonstrate compliance with the applicable program regulations. The monitoring effort will continue throughout the Plan and will include:

- Mid-year Reports- The Puerto Rico Adult Education Program requires all local providers to submit quarterly reports that reflect participation levels for the first three months.
- Annual Program Evaluation- The Program conducts continuous comprehensive program evaluation. This evaluation includes all participating local providers and uses surveys of all local providers, on-site observations, and interviews. It provides recommendations for state level planning and development activities for the following year. It will also identify the best practices and emerging needs in conjunction with the training and technical assistance needed for local providers to establish high quality, effective instructional programs to the targeted populations specified in the State Plan.
- Student Follow-up- The Adult Information System's report submitted to the USDOE will reflect the grantee's progress in achieving the objectives in the application of the program and the effect of the program on participants served.

Vocational Rehabilitation

The agency will assess its performance accountability measures, described in section 116(b) of WIOA, through:

- Reports on WIOA indicators based on data gathered through the case management system;
- Satisfaction surveys to customers, employers and Community Rehabilitation Programs;
- Compliance with strategies established in the VR Portion of the Plan; and
- Internal programmatic monitoring.

To collect data for the WIOA performance indicators, PRVRA staff will follow-up on customers and request data on employment and wages records from other agencies.

The VRA has developed the following strategies to assist other WIOA components in helping people with disabilities:

1. Coordinate the participation of VRA staff in the American Job Centers [AJC] to properly channel the needs of those with disabilities who request information and service in such centers.
2. Identify possible referrals to the services of the VRA.
3. Provide the AJC staff with guidance on various topics of interest that are requested related to people with disabilities.
4. Actively participate in job fairs coordinated by the AJC.
5. Exchange of employment networks/employers.

B. Assessment of One-Stop Partner Programs

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

Puerto Rico is currently pursuing a dual-track evaluation strategy designed to connect economic development with high-performance service delivery. The Evaluation proposals includes the following:

- The Reshoring Workforce Initiative: Data-Driven Industry Alignment

  In direct response to Executive Order OE-2025-012, the Department of Economic Development and Commerce (DDEC) launched the Reshoring Puerto Rico Workforce Fund RFP in September 2025. This initiative represents a paradigm shift in how the Island prepares its labor pool for global competition. A cornerstone of this initiative is a comprehensive analysis of the current "training ecosystem." This mechanism will identify "real-time" skill gaps, allowing the State Board to pivot training investments as rapidly as the market evolves.

- The One-Stop Excellence & Risk Mitigation Assessment

  Beyond industry alignment, the Board is conducting a sophisticated Service Delivery Audit across the American Job Center (One-Stop) network. This dual-purpose evaluation and risk assessment targets the "customer journey" to ensure efficiency and compliance.

- Human-Centric Service Delivery: The assessment analyzes front-line staff interactions to ensure that customer service and participant assessments are standardized, empathetic, and effective.

- Integrated Service Logic: The evaluation scrutinizes the depth of Co-Enrollment and Service Integration, ensuring that participants can seamlessly access multiple programs (such as WIOA Title I and Wagner-Peyser) without administrative friction.

- Market-Facing Operations: The audit extends to Business Outreach and job placement efficacy, measuring how successfully staff bridge the gap between training programs and high-demand job opportunities.

- Risk Management: By identifying operational bottlenecks and compliance vulnerabilities, this assessment serves as a safeguard against performance failures, ensuring the system remains resilient and audit-ready.

(B) *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 in 4(A). Describe how the State adapts its strategies based on these assessments.

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

Panel Consensus (Compliance): Puerto Rico did not respond to this section of the narrative due to not submitting PY 2017 and PY 2018 reports. Therefore, Puerto Rico did not include previous assessment results for all core programs. Instead, Puerto Rico should refer to assessment results for PY 2020 and PY 2021.

Title I Programs Assessments

The Monitoring and Compliance Division of DEDC assesses the Operational, Administrative, and Fiscal Systems using the DEDC Monitoring Rule and the Resolution of Audit Reports of WIOA grants and other funds allocated by USDOL. The DEDC rule defines monitoring as a continuous process of structured assessment of the operations of local areas and sub-recipients to identify at an early stage those inappropriate practices that may result in non-compliance with the purposes of the act and the 20 CFR.

Some of the objectives established in the State Monitoring System, as instituted in the current rule, are:

- Conduct annual on-site monitoring reviews of local areas' compliance with 2 CFR part 200, as required by sec. 184(a)(3) of WIOA.
- Verify expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations.
- Determine the compliance with WIOA regulations and other applicable laws
- Verify that services to participants qualify for Title I programs and as specified in the Local Plan and annual funding allocation plan.
- Evaluate the internal control structure concerning these objectives to determine the risk of illegal acts or violations of the Allocation Contract, Applicable Laws, or Regulations.
- Expand the analysis carried out by DDEC units regarding financial reports, identify any deviation or unexpected result reflected in the reports, and corrective actions implemented at the local level.

WDP Evaluations

DEDC provides tools to local areas that enable them to track their performance measures as the year progresses and to track the impact on the performance of each of their participants. In addition to federally mandated reports, the WDP has developed a variety of locally requested reports that allow staff to track caseloads, correct data entry errors, and analyze performance at the state, local, and desk levels. A quarterly report on the execution, level of expenditures and participants is sent to the CEOs, LWDBs and LWDA staff.

The Workforce Development Program, through a partnership with Abdul Latif Jemeel Poverty Action Lab (J-PAL) North America, has been working since 2021 to strengthen our program's use of evidence-based strategies to support the 15 Local Workforce Development Areas. This work aims to enable the LWDA to continuously improve the various workforce development services AJCs provide, as stipulated by WIOA. The opportunity to collaborate with researchers in the J-PAL

North America network would be crucial support as we seek to access and generate rigorous evidence that would help DDEC best use the available resources to serve the people of Puerto Rico.

The first phase of research is expected to be completed by December 2022. This will be followed by the second phase of technical assistance to the case management staff of each LWDAs. By measuring progress and implementation results, we will be able to collect data that can move our work along an evidence continuum. In addition, by December 2022 we expect to have a complete case management module that will allow us to better measure the compliance of WIOA requirements and with the needs of participants as part of the process.

Through the monitoring reviews, the State Board identified technical assistance needs to attend to the primary monitoring and oversight findings such as:

1. MOU's and IFA's compliance with requirements established in the policy WIOA – 01– 2017: *Memorandums of Understanding and Infrastructure Agreements* and on the statutory requirements of WIOA and its implementing regulations.

2. Some LWDBs do not meet all the requirements of the Sunshine Provision in compliance with the related Public Policy *DDEC-WIOA-01-2021: Guidance on the responsibility of Local Boards to comply with transparency and disclosure requirements*.

3. Some LWDBs did not demonstrate that they conducted a monitoring review of the Youth Program.

4. Lack of documentation in the files of participants in the adult and dislocated worker programs related to skills assessment, support service needs, and incomplete or generalized Individual Employment Plan (IEP) goals, among others.

5. For the Youth Program, we found files with generalized Individual Service Strategy (ISS), a lack of documents evidencing eligibility, and a lack of follow-up to participants.

6. The contracts lack the required minimum clauses and correct references to WIOA law. DEDC will be issuing a policy related to this issue.

7. There is a need for technical assistance in determining the eligibility of participants in the youth, adult, and particularly dislocated worker programs.
8. Lack of controls to meet the 20% spending requirement in the work experience element of the Youth Program. Quarterly reports are already being worked on with DEDC Finance to track the level of LWDB spending.
9. Lack of several public policies such as priority of service, needs additional assistance, among others.
10. Lack of complaints and grievance procedures
11. Some local boards didn't demonstrate that they have taken steps before the competition of its One-Stop operators, such as market research, requests for information, and collection of a cost price analysis, among others. WDP staff will provide technical assistance to ensure compliance with policy WIOA-02-2017.
12. Lack of documentation demonstrates the competitive selection of professional and career service providers, etc.
13. Lack of internal controls related to property management and others with state legislation.
14. There is a need to improve technological access to people with disabilities in the AJCs.
15. The self-service and career resource area in the AJCs does not have all the required information.

Title IV- Vocational Rehabilitation Assessments

The PRVRA conducted a Comprehensive Statewide Assessment of Rehabilitation Services' Needs (CSNA) between 2020-2021 whose results are presented under section J of the Vocational Rehabilitation portion of this State Plan. The CSNA includes aspects of the quality, effectiveness, and needs for improvement, which are considered by the PRVRA to develop its Goals and Strategies. Also, Section P of the VR portion of this plan includes the results on how the VR program goals were achieved during PY 2019 and 2020.

The Vocational Rehabilitation (VR) program had negotiated levels of performance starting in PY 2020 and for the Measurable Skill Gains indicator only. Therefore, the following indicators were designated as "baseline" for the VR program:

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

Performance Indicators	PY 2019 Negotiated Level	PY 2019 Achievement	PY 2020 Negotiated Level	PY 2020 Achievement
Employment Second Quarter After Exit	None	30%	None	41%
Employment Fourth Quarter After Exit	None	31%	None	26%
Median Earnings Second Quarter After Exit	None	$3,915	None	$3,915
Credential Attainment Rate	None	28.5%	None	35%
Measurable Skill Gains	None	19.8%	17%	34%
Effectiveness in Serving Employers	Not Applicable (not negotiated	Not Applicable	Not Applicable (not negotiated	Not Applicable

Performance Indicators	PY 2019 Negotiated Level	PY 2019 Achievement	PY 2020 Negotiated Level	PY 2020 Achievement
	by core-program)		by core-program)	

Based on the evaluations and other programmatic monitoring carried out by the central office of the PRVRA, the agency adjusted its goals and strategies.

Title II- AEP Assessment

The Adult Education Program (AEP) of the Puerto Rico Department of Education (PRDE), WIOA Title II delegate agency, conducts continuous annual evaluations of local service providers of activities under Title II. The evaluation is carried out as part of the requirements of the proposals that the service providers present to the Adult Education Program. Each year the effectiveness of service providers in providing educational services to adult program participants is evaluated. The methods used are as follows:

Effectiveness evaluation

The Puerto Rico Department of Education uses valid and reliable evaluation methods to evaluate the execution of the Educational Functioning Levels (EFL). The EFL is a measure of what students should know at each level of functioning. The performance of the functioning levels is evaluated by making comparisons of two years or more of the percentages that the service providers obtain when offering the educational services to the participants. In order to have a good execution, the results of the evaluations of the service centers must respond to the performance levels that are negotiated with the Federal Government and if they do not comply with this criterion, they must show that their percentages have improved compared to the previous year. The performance levels are negotiated with the Federal Government, and this is the metric used to demonstrate the

effectiveness of the service providers. These data are collected through the National Reporting System (NRS) from adult program participants.

The use of standardized tests

To assess the quality of educational services under title II, the DEPR-AEP uses standardized tests to require controls to measure the quality of teaching and provide the opportunity for participants to go beyond the classroom. Test administration provides accurate information and ensures placement of adult learners in appropriate instructional levels. In addition, it allows to obtain in a reliable way the educational gain and with it the promotion of the participants to a more advanced level.

PRDE uses the following guidelines to document achievements:

1. Selection and use of appropriate evaluation instruments
2. Manage the pre-test for diagnostic purposes and guide the teaching process.
3. Placement to place the student in the appropriate program and level of instruction.
4. Use post-test results to validate educational gain and promotion to the next level.
5. Establishment of valid performance standards
6. Report valid and reliable evaluation results and related information.

Annual AEP assessment of individual service providers

To meet the annual assessment requirement, AEP Adult Information System (AIS) staff maintains an ongoing assessment program that provides technical assistance and verifies compliance by all local services providers. The evaluation program includes quarterly technical assistance seminars for all educational service providers to discuss progress in data collection and data quality.

Annually, at the end of the current program year, staff prepare a summary evaluation report, which is used by a team of three staff serving as academic and operations facilitators to visit local providers and discuss performance results and the areas of improvement.

As part of the annual assessment, the AEP assesses the past effectiveness of local providers (WIOA Criterion 3) in improving the literacy of eligible individuals, to meet State-adjusted performance levels for primary indicators of performance standards outlined in WIOA section 116, especially with respect to eligible individuals who have low literacy levels.

In addition, annually, the AEP verifies that each service provider meets the performance levels negotiated by PRDE with the OCTAE- NRS and, in case of non-compliance, whether there has been an improvement compared to the previous program year. If there has been an improvement, the AEP views this as a performance gain and provides an extension to the service provider for compliance.

> (C) *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)).

State Board Evaluations

Title I of the workforce development system in PR has not conducted any evaluation of WIOA implementation. Since PY 2017, the State has applied for Waiver 129(b)(1)(A) and 134(a)(2)(vi), to exempt the state from carrying out the evaluation required in by the regulation. In PY 2018-2020, ETA approved the waiver for statewide required activities described in WIOA Section 129(b)(1)(A) and 134(a)(2)(vi); to conducting evaluations under section 116(e) of activities authorized under this chapter, however, after finishing the waiver, the state did not make any evaluations required in section 129 and 134.

There are several aspects of WIOA which need to be evaluated since WIOA implementation and development initiatives to transform the provision of services, increase the use of funds, and improve performance. We will follow the recommendation to use DOLETA resources and tools to

design the evaluation of the areas or issues identified by the State Board and the core and required partners of the AJC:

- WorkforceGPS Evaluation and Research Hub
- Evaluation Toolkit: Key Elements for State Workforce Agencies September 2020
- Peer Learning Cohort on Evaluation (EvalPLC)

The Evaluation and Monitoring Committee of the State Board will be activated to manage the evaluation process, and the DEDC Auction Committee will be used to develop the respective RFPs for the contracting of external resources to carry out the evaluations. It is recommended to perform the following activities:

1. Surveying the cores and required partners to identify common evaluation areas
2. Identify the areas that can be assessed with the internal staff of the partners:
    a. Selection of One-Stop Operator
    b. Competitive selection of youth service providers
    c. Common intake and co-enrollment process
3. Survey the state board to identify areas of concern
4. Develop RFPs to hire evaluators for items that require expertise or be evaluated by external resources objectively
5. Some of the evaluation topics identified are:
    a. Number of Local Areas needed
    b. Local Areas Organization Designs
    c. Comprehensive AJC
    d. Policy development process and standardization
    e. Delivery of services in the youth program

f. Employer engagement and services in AJC

g. AJC flow of services among partners

h. Dissemination and Outreach approaches

i. Promising practices, discontinued or obsoletes practices

j. Most in needed accessibility, outreach, and delivery of services

k. Participant empowerment to design and select their services

l. Remote Workforce Services and Online Learning

6. Complete at least the following assessments in the next two years:

    a. Four internal assessments with partner staff

    b. Four evaluations through procurement (two in each PY)

7. Develop a plan to address evaluation findings, including discussion with Local Boards and CEOs

8. The state Board and local boards must develop public policy to promote the required changes to the system based on the results of the evaluations

Evaluation program vs. monitoring program: Description of AEP Monitoring program

The AEP does not have a formal evaluation program but a monitoring program. To validate compliance with the rules and regulations that apply to the AEP, monitoring is carried out with the primary objective of evidencing the day-to-day services.

In the monitoring application process, the staff assigned to the AEP must collaborate with the Regional Educational Office (ORE) staff and local provider's education centers to be monitored. The monitors will be duly identified and authorized to have broad access to all the documentation related to the administration and implementation of the activities of the Adult Education Program. They will maintain the level of confidentiality established by law. In addition, they will have access

to all the facilities where projects subsidized with federal funds are implemented. The monitors, if requested, can assist in the investigation of any activity at the request of the AEP management.

It is the responsibility of the education center's management to comply with the recommended corrective action plans. The staff assigned to the PEA will monitor their compliance.

The officer carrying out the monitoring will make a checkmark under Yes, No, or N/A in each criterion to be evaluated. At the end of each evaluation area, will add the evaluated criteria and the criteria marked as YES and write the subtotal reached for each evaluation area; will add the subtotals of each area to determine the score obtained and then divide the score obtained by the total criteria evaluated to calculate the result of the monitoring according to the percentage of the evaluation scale.

The service provider will present all the evidence required for the application of this guide, including but not limited to agendas, attendance lists, minutes, files, reports from the Adult Information System (SIA), calendars, work plans, improvement plans, among others. At the end of the monitoring administration process, it will be discussed, and technical assistance will be offered in the areas that merit it. Educational service providers scoring 69% or less may have their contracts terminated and will not be considered for contracting in future competitive proposals.

The process of administration, follow-up, and compliance with the Programmatic and Fiscal Monitoring Guide will be carried out according to the provisions of the Monitoring Unit Procedure Guide, which constitutes a support system in the effective implementation of the Program to promote its continuous improvement.

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

The Governor allocates WIOA formula funds according to services to youth, adults, and dislocated workers in accordance with WIOA sections 128(b) and 133(b). The Governor's reserve funds from each of these sources for state-wide workforce investment activities. In making these reservations, the Governor reserves up to 15

percent from each of these sources. Reserved funds are combined and spent on statewide employment and training activities for adults and dislocated workers, and statewide youth activities, without regard to the funding source of the reserved funds. In addition, the Governor reserves a portion of the dislocated worker funds for statewide rapid-response activities, as described in WIOA. In making this reservation, the Governor reserves up to 25 percent of the dislocated worker funds.

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

(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),

The Governor elects to distribute funds in accordance with the allocation formula in section 133(b), as follows:

1. 331/3 percent based on the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in the State,
2. 331/3 percent based on the relative excess number of unemployed individuals in each workforce investment area, compared to the total excess number of unemployed individuals in the State; and,
3. 331/3 percent based on the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in the State.

(ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

The Governor elects to distribute funds in accordance with the allocation formula in section 133(b), as follows:

1. 331/3 percent based on the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in the State.
2. 331/3 percent based on the relative excess number of unemployed individuals in each workforce investment area, compared to the total excess number of unemployed individuals in the State; and
3. 331/3 percent based on the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in the State.

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

The Governor elects to distribute funds in accordance with the following allocation formula:

1. Insured unemployment data:20 percent of the allocation.
2. Unemployment concentration: 20 percent of the allocation.
3. Long-term unemployment data: 20 percent of the allocation.
4. Farmer-rancher economic hardship data: 5 percent of the allocation.
5. Plant closing and mass layoff data – 20 percent of the allocation; and
6. Declining industries data: 15 percent of the allocation.
7. Total – 100 percent of allocation

(B) *For Title II*:

(i) Describe the methods and factors that the eligible agency will use to distribute Title II funds.

The Department of Education of Puerto Rico (DEPR) is the eligible agency for adult education, literacy programs, and implementation activities under Title II of WIOA. The Adult Education and Family Literacy Act (AEFLA), the Assistant Secretary for Alternative Education-Adult Education Program (AEP) and the State Director for Adult Education, are the implementation unit for these programs.

The implementation of the curriculum in all Adult Education program centers requires continuous faculty development efforts to ensure that teachers are thoroughly familiar with the requirements of academic content standards. Hired curriculum facilitators will provide technical assistance in the implementation of the curriculum in all Adult Education program centers and activities. The directors and key staff of the AEP Program will provide technical assistance to program teachers in curriculum implementation. Adult Education program teachers will receive specialized training on the standards, indicators, assessment activities of the curriculum, and activities related to the development of 21st Century skills relevant to competitiveness in the global labor market, STEM, employability, workforce preparation skills, and career pathways.

The AEP emphasizes the importance of the lives of people who have not completed high school, the need for English language learning and civic participation, and the rights and responsibilities of citizens. This aligns with the purpose of AEFLA to assist immigrants and other individuals who are English language learners to improve their reading, writing, and comprehension skills in English and

mathematics as well as to understand the American system of Government, individual freedom, and the responsibilities of citizenship. The commitment of the AEP is focused on providing a structured, innovative, flexible, and contextualized curriculum, in addition to being dynamic and adaptable to changes in social and educational systems in a contextualized environment.

The AEP will update the workforce preparation curriculum according to labor trends with opportunities and allow the expansion of the career pathway model. These activities on career pathways and soft skills in the new curriculum will provide the transferable skills needed by individuals to make them "employable" to an employer, including problem-solving, oral communication, adaptability, collaboration, resource management, organizational skills, written communications, and technology use. In addition, this training allows participants to develop their own businesses.

The Service Providers of each center will receive technical assistance related to all requirements of the AEP training activities to achieve better academic performance and greater preparation so that adult participants can compete in post-secondary levels and/or in the areas of need required.

(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 procedures for all eligible providers.

The program will ensure that service providers deliver services to eligible individuals who have attained at least 16 years of age, are not enrolled, need to be enrolled in a secondary school under

Puerto Rico law, lack basic skills, do not have a secondary school diploma or its recognized equivalent, or are English language learners.

The following organizations will be eligible to apply for funding, provided they have demonstrated effectiveness and comply with the following considerations:

1. Local education agency
2. Community-based or faith-based organizations.
3. Volunteer literacy organization
4. Public or private non-profit agency
5. a public housing authority
6. a library
7. a consortium or coalition of the agencies, organizations, institutions, or libraries
8. a partnership between an employer and an entity
9. an institution of higher education
10. A non-profit institution that can provide adult education and literacy activities to eligible individuals.

An eligible provider must establish that it has demonstrated effectiveness through performance data on its record of improving the skills of eligible individuals, particularly those with low levels of literacy in reading, writing, mathematics, English language acquisition, and other subject areas relevant to the service provided in the state's application for funds. In addition, the provider must provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to post-secondary education and training.

The providers could demonstrate past effectiveness in basic skill-deficient eligible individuals in all the following areas: reading, writing, mathematics, and English language acquisition. The outcomes used to determine the demonstrated effectiveness are as follows:

1) The number of eligible individuals with basic skills deficient in reading, writing, math, and English language skills.

2) Attainment of secondary diploma/equivalent

3) Transition to post-secondary education and training

A. Providers' grant distribution criteria.

The PRDE's Adult Education Program uses the following parameters to distribute funds to approved applicants:

1. No less than 82.5 percent of the grant funds will be used to award grants and contracts under Section 231 and to conduct Section 225, of which no more than 20 percent of such amount shall be available to conduct Section 225.
2. Shall not use more than 12.5 percent of the grants to conduct State Leadership activities under Section 223.
3. Shall not use more than 5 percent of the grant funds or $85,000, whichever is greater, for the administrative expenses of the eligible agency.
4. Every effort is made to select at least one eligible provider for each local area of the workforce system in Puerto Rico.

5. The provider's grants will be distributed based on the ability to meet the following AEFLA purposes outlined in WIOA:

   (a) Assist adults in becoming literate and obtaining the knowledge and skills necessary for employment and economic self-sufficiency.

   (b) Assisting parents and family members in becoming fully engaged partners in their children's educational growth.

   (c) Promote the transition from adult education to post-secondary education and training through career pathways.

   (d) Assist adults in completing high school and holding a diploma or equivalent certificate.

   (e) Assist immigrants and English language learners improve reading, writing, math, and comprehension of the English language and acquire an understanding of the American government, individual freedom, and responsibilities of citizenship.

The PRDE's AEP will fund each eligible provider to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently. The eligible provider is responsive to the

1. Regional needs as identified in the local plan under WIOA; and
2. Serving individuals in the community who were identified in such a plan as most in need of adult education and literacy activities, including individuals who:
   a. Have low levels of literacy skill; or
   b. Are English language learners.
3. The ability of the eligible provider to serve eligible individuals with disabilities, including those with learning disabilities.

4. The providers' activities, including reading, writing, speaking, mathematics, and English language acquisition, are based on the best practices derived from the most rigorous and appropriate research available, including scientifically valid research and effective educational practice.
5. Provide learning in context, including through integrated education and training, where participants acquire the skills needed to transition to and complete post-secondary education and training programs, obtain and advance employment leading to economic self-sufficiency, and exercise the rights and responsibilities of citizenship.
6. The provider's activities are delivered by well-trained instructors, counselors, and administrators, who meet any minimum qualifications established by the State.
7. The provider maintains a high-quality information management system that can report measurable participant outcomes and monitor program performance.

(C) 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.

Rehabilitation Act 93-112 provides the necessary services to eligible certified persons with disabilities. Services are offered so that people with disabilities can prepare, enter, advance, obtain, or retain employment consistent with their strengths, priorities, resources, interests, concerns, unique skills, and informed selections. The population that can be referred to this program must comply with the following criteria:

1. A qualified professional determines that the applicant has a physical or mental impairment.

2. The physical/mental condition of a person constitutes or results in substantial impediment to employment.

3. The applicant requires vocational rehabilitation services to prepare for, secure, obtain, retain, or advance employment that is consistent with their strengths, resources, priorities, abilities, interests, functional residual abilities, and informed selection.

4. Presumption that the person can benefit from vocational rehabilitation services to obtain a job.

(6) Program Data

(A) *Data Alignment and Integration*. Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through post-secondary 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 its 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 of collecting and reporting data on co-enrollment, and for those present in one-stop centers.

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

Planning Note: States should be aware that Section 116(i)(1) establishes the obligation for core programs, local boards, and elected officials to establish and operate an information system

that encompasses both fiscal and administrative accountability. This system must adhere to the guidelines set forth by the Secretaries of Labor and Education. Furthermore, it is important to note that the Departments of Labor and Education are willing to collaborate with states, providing guidance and potentially assisting in the collection of information related to these accountability systems in the future. States should initiate necessary preparations to comply with these fiscal and management accountability requirements. It is important to recognize that any adjustments made to fulfill these elements may present opportunities or generate impacts on the existing fiscal and management accountability system.

The Government will comply with the USDOL's specified fiscal and management accountability information system.

Program Data

To better support data integrity and data integration, DEDC issued an RFP for an updated version of the PRIS case management system. The contract was awarded to the software company Softek Inc. Currently, PRIS integrates WIOA and Wagner-Peyser participant data. In addition, the Department of Family utilizes the system to refer PAN participants to the career centers. DEDC hopes to implement a Common Intake form to integrate the services for all partner programs.

PRIS

The Participant Record Information System (PRIS) is the database used by Puerto Rico's labor development system to record participants and produce reports on the execution of programs and services provided under Title I-B and Title III (Employment Services) of WIOA. Operations began on March 9, 2020. At the state level, basic partners such as Title II (Adult Education and Literacy) and Title IV (Vocational Rehabilitation Act) have not reached collaboration and coordination agreements for integration, although they expect to be incorporated into the PRIS system through an additional module via an agreement. Currently, the only established co-enrollment agreement is between Title I and Title III (Wagner–Peyser). The Vocational Rehabilitation Act (VRA), along with its Department of Economic Development and Commerce, has not achieved common data collection among partners at the mechanized level in the PRIS,

which is used to identify participants with the same social security number and period group as Title I to determine concurrent participation between Title I and Title III. There is a data collection issue to include participants in the PRIS, as local agencies have different data systems, and at the state level, the details of the integration have not been determined.

The PRIS is constantly updated according to requests from the DDEC/PDL and DTRH. The PRIS has undergone amendments and modifications due to the creation of modules and amendments to federal labor department laws or regulations. The provider works to expand the capacity of the PRIS with additional modules.

The DDEC is in the final stages of the development and implementation of co-enrollment in all required core programs through the PRIS platform, including expanding tools available in the market. Through technology, the Vocational Rehabilitation Administration (ARV) developed a platform for the Referral and Information Exchange of Injured Workers under the State Insurance Fund Corporation (CFSE). Currently, this platform is being developed for referrals of students with disabilities received by the ARV through the Department of Education (DE). It is intended that this process will also be implemented between the ARV and the Labor Connection areas.

The WDP has successfully evaluated the success of the WIOA program in Puerto Rico in the past year, and performance reports under WIOA performance indicators were submitted at the federal level. However, it is important to note that the WDP has been working on identifying effective measures to evaluate both historical and current data. The goal is to move beyond simple descriptive statistics and reach a level of predictive analysis, and more importantly, generate prescriptive analysis. The WDP focuses on understanding the factors that influence program performance. This involves determining whether the results achieved are reasonable, anticipating the levels of performance likely to be achieved in the future, and identifying the specific actions that the system must take to provide effective results to individual clients. In this regard, the WDP is developing a methodology to evaluate these issues to optimize resource utilization and improve operational efficiency. Analysis enables the use of various techniques, such as simulations and optimization, to determine the best course of action. This data-driven

approach will become a solid foundation for decision making in the WIOA program in Puerto Rico.

The VRA, as part of its responsibility as a partner mandated by the WIOA Act, together with the Department of Economic Development and Commerce, began collecting common data among the partners. Currently, we are implementing this program.

The VRA continues to implement the following strategies to improve the state's functioning concerning evaluation standards and performance indicators:

- Periodic Sharing of Statistical Information: The VRA continues the practice of periodically sharing vital statistical information with regional staff. This ensures that all regions have up-to-date data for informed decision-making and effective management.
- Regular and Periodic Sharing of Statistical Information: The State maintains the practice of regularly sharing key statistical information with regional staff, which is vital for meeting evaluation standards and performance indicators. This includes technical assistance on WIOA Performance Indicators and accurate data entry for the RSA-911 report, ensuring all regions have current data for effective management and compliance with performance accountability measures.
- Development and Articulation of Regional Intervention Plans: Intervention plans are developed in collaboration with regional directors, focusing on areas facing challenges. These plans are crucial for meeting specific evaluation standards and performance indicators, as they are based on detailed analysis of local employment situations and case projections.
- Enhanced Case Management Systems and Post-Program Follow-ups: Updating the case management system to include follow-ups for post-program exit cases aligns with performance accountability measures. It involves integrating employment and salary indicators per Section 116 of WIOA, facilitating the tracking of performance outcomes for consumers who have exited the program.
- Services to Employers and Coordination for Unemployment Insurance Information: Services to employers, including orientation and training, are aligned with performance

indicators related to employment outcomes for individuals with disabilities. Additionally, coordinating with the Department of Labor and Human Resources to access Unemployment Insurance information helps validate employment indicators under WIOA, a key performance measure.

- Promoting Postsecondary Education and Referring to Other Mandatory Programs: Active promotion of postsecondary education and referrals to other WIOA programs are part of the strategies to enhance measurable skills gains, a significant performance indicator. This includes ensuring follow-up for credentials presentation, aligning with the performance goals of the programs.
- Supporting Innovation, Expansion Activities, and Overcoming Barriers: Identifying and addressing needs for innovation, such as using remote interpretation technology, contributes to performance improvement in service delivery. Ensuring accessibility and overcoming barriers to VR services are also crucial for meeting performance indicators, especially in reaching and serving diverse populations effectively.
- Improving VR Services for Students with Disabilities and Transition Planning: Enhancing VR services for students with disabilities involves strategies that are directly linked to performance indicators like transition success rates and post-secondary outcomes. The coordination with educational agencies in transition planning ensures compliance with performance standards.
- Strengthening Administrative, Programmatic, and Technological Procedures: Implementation of technology projects for case management and document sharing supports the achievement of performance indicators by improving efficiency and data accuracy. Regular performance evaluations of agency employees and updating of administrative procedures ensure that the programs continuously meet and improve upon established performance standards.
- These integrated strategies demonstrate a comprehensive approach to developing an interoperable management information system across core programs. This approach not only facilitates efficient data exchange but also ensures adherence to evaluation

standards and performance indicators, enhancing overall program assessment and effectiveness.

These strategies illustrate the VRA's commitment to developing an interoperable management information system across core programs, facilitating efficient data exchange, and enhancing overall program assessment and evaluation.

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.

The WDP has established plans with the aim of integrating data systems to streamline admission and service delivery, while facilitating the tracking of participation across all programs included in this plan. The primary objective is to enable the required partners to use the Participant Registration Information System (PRIS) as their central database platform, simultaneously facilitating the exchange of relevant information among different partners. This is done to prevent service duplication and to allow for more efficient client tracking as they engage with the program.

Currently, Title I and Title III use the PRIS system as their registration platform. By contrast, Titles II and IV employ their own systems. This disparity in the registration systems has been identified as a challenge. The phase of development regarding the interoperable integration of Title II and Title IV programs is currently in the analytical stage. This suggests that careful evaluation of how to achieve integration before proceeding to full implementation is underway.

In a recent meeting among key partners, the need for technological integration was emphasized. The PRIS system is prepared to integrate with partners who do not use the same system through the "Enterprise Service Bus," which acts as an integration hub. In the short term, ongoing efforts are being made to establish communication between systems, enabling electronic referrals, tracking, and the retrieval of results. Regarding the targeted completion date for integration of the database among

partners, December 2024 was set as the objective. This period signifies a long-term commitment to achieving desired technological integration.

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.

WIOA's lead agencies in Puerto Rico are committed to the governor's vision for workforce development and recognize its relevance to the island's economic and social progress. The progress of participants is monitored through the PRIS system, allowing the identification, evaluation, and reporting of participants' performance in terms of obtaining educational credentials or securing jobs that contribute to economic development. The Puerto Rico Workforce Development Program recognizes the importance of evaluating the success of the WIOA program on the island. The State Board plays a critical role in collaborating with the Governor to align technology and data across all comprehensive partner programs, including One-Stop Partner Programs. This alignment aims to improve the delivery of services to people, including the unemployed.

Under WIOA, core partners are expected to collaborate within a Single Management Center system to provide comprehensive services to job seekers and employers. The State Board evaluates the execution of each core partner in coordination with the core partners to ensure that they meet the objectives and expectations established in their respective parts of the plan.

Specific evaluation processes and criteria may vary from one AJC to another and may be defined in the local Memorandum of Understanding (MOU) between lead partners. The evaluation includes assessing each lead partner's contribution to the AJC’s overall performance, such as its effectiveness in serving jobseekers and employers, achieving program objectives, and meeting program objectives. WIOA requirements.

These evaluations are conducted periodically, and performance assessments help identify areas for improvement, effectively allocate resources, and ensure that the AJC system continues to provide high-quality services to its clients. It also helps maintain accountability and transparency among key partners in the AJC system. To ensure that the system is operating in the shortest time possible, the WDP and State Board hold follow-up meetings on the status of system development and improvements.

As established in the WIOA Act, the Department of Economic Development and Commerce (DDEC) must provide the Governor of Puerto Rico with program execution indicators. These reports are based on those submitted through the Program Planning Information System (WIPS). After reporting on the WIPS, a report will be produced on Puerto Rico's execution of Title I. The State Board coordinates the compilation of these execution reports and presents them as a unified report published on the State Board's website, which is on the DDEC website.

Regarding the reports required by the WIOA Law, Puerto Rico complied with submitting and certifying them, including ETA 9173 of Q4 for the PY2021 and PY2022 programming years. ETA 9169 and 9171 are in the process of reporting PY2022.

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

In compliance with Section 116(d)(1) of WIOA and related federal guidelines, the system consists of a multiuser web-based software based on the Participant Individual Record Layout (PIRL, ETA-9172), including the validation rules established by DOLETA and reports related to the PIRL database. Its main function is to comply with the three sets of validation rules (duplicate rules, valid value rules, and logical rules) reflected in the generation of 100% error-free, comma-delimited text files (csv files) based on the PIRL schemas for all programs.

The Workforce Development Program is in the final stages of development to streamline the application process to integrate and interface the participant management systems of WIOA Titles II and IV with other required partners.

The PRIS collects and reports on performance measures for Title I and Title III programs. Currently, ETA 9169, for PY 2021, has been submitted and certified by WIPS, and we are in the process of reporting PY2022. We have collaborated with Title III regarding the ETA 9169 report submission process. Before reporting, an error report corresponding to Title III was sent for review and correction. When the ETA 9169 report is generated, Title III certifies it in DOL's WIPS system. These practices are crucial to ensure that the information presented is accurate and complies with WIOA regulations. Additionally, Q4 ETA 9173 reports for PY2021 and PY2022 programming years have been submitted, and ETA 9171 is in the process of reporting for PY2022.

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

WIOA's lead agencies are committed to the governor's vision of Puerto Rico's workforce development and its importance to economic and social development. The participants' progress is monitored using the PRIS system. WDP has been identifying effective measures for evaluating current and historical data to move from simple descriptive statistics to predictive statistics, and more importantly, to formulate prescriptive analyses.

Several factors that influence the outcomes achieved and future planning must be considered to assess and improve the execution of programs under WIOA. These factors include collecting and analyzing accurate data on the progress and outcomes of the program, such as employment placement, income growth, and the

completion of training programs. Additionally, it is crucial to understand the changing demands of the labor market by identifying growing sectors or industries, in-demand skills, and emerging opportunities. Stakeholder engagement, involving employers, educators, community organizations, and clients, provides essential feedback on a program's effectiveness. Furthermore, establishing a continuous evaluation process that allows real-time corrective actions and continuous feedback from stakeholders is essential.

The methodology used to evaluate these factors involved collecting data from participants, including demographic information, services received, educational achievements, and employment outcomes. Local areas and the state have access to a dashboard that allows them to visualize data and monitor program execution. Moreover, data analysis and extraction techniques can be employed to identify trends, patterns, and areas that require improvement. Surveys should also be conducted among program participants, employers, and educational institutions to gather valuable insights into program effectiveness.

Regarding performance indicators for programs under the WIOA, core partners assess key indicators, such as employment in the second quarter after exit, employment in the fourth quarter after exit, median income in the second quarter after exit, credential attainment rate, and measurable skill gains.

For the Wagner-Peyser Employment Service program, similar indicators are assessed, including employment in the second quarter after exit, employment in the fourth quarter after exit, and median income in the second quarter after exit. It is important to note that the credential attainment rate and measurable skill gain indicators do not apply to the Wagner-Peyser Employment Service program. Finally, the Employer Service Effectiveness (ESE) indicator is measured as a shared outcome among the six core programs within each state to ensure a comprehensive approach to serving employers. Due to the lack of historical data, states are not required to submit the expected levels of performance for the ESE indicator in 2022

and 2023. Each core program must submit expected performance levels for all other applicable indicators.

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

The wage record information is used to determine employment, retention, and average earnings. Puerto Rico's Unemployment Insurance (UI) wage records are the primary data source. The signing of the SWIS (State Wage Interchange System) Agreement between Puerto Rico and the United States Department of Labor (DOLETA) is a crucial step for collaboration in the collection of interstate quarterly wage records. This agreement allows the exchange of salary data between Puerto Rico and the federal government, specifically with DOLETA, to use this information for purposes related to workforce programs and law enforcement. The SWIS Agreement replaces the Wage Record Interchange System (WRIS and WRIS2) Data Sharing Agreements previously executed by most States. States signing the Agreement will be able to exchange interstate quarterly wage records with any other State signing the Agreement to satisfy performance reporting requirements in Section 116 of the Workforce Innovation and Opportunity Act (WIOA).

The PR Department of Labor and Human Resources is the SUIA agency. “SUIA” is the state agency that holds wage data, whether such agency also administers the state’s unemployment insurance program. On the other hand, PACIA” is the Performance Accountability and Customer Information Agency designated by the governor to be responsible for coordinating the state’s program for assessing state and local program performance and evaluating training provider performance. The PACIA is the PR Department of Economic Development & Commerce – Access

PACIA, PR Department of Education – Access PACIA, PR Department of the Family – Access PACIA, and PR Vocational Rehabilitation Administration – Access.

Puerto Rico has met the requirements for utilizing quarterly Unemployment Insurance (UI) wage records for accountability, evaluations, and as a source of information on the workforce and labor market in accordance with federal and state laws. This achievement is facilitated by the State Wage Interchange System (SWIS).

All inquiries for wage data related to applicable programs are processed through the SWIS Clearinghouse. The Department of Labor and Human Resources (DTRH) in Puerto Rico generates a list detailing the employment status of each participant, including the employers they are working for and their salaries. This list, known as the "State Wage Record File," is loaded into the "Participant Record Information System" (PRIS) to record the wages corresponding to each participant in the WIOA program. This enables the identification of employed participants, their employment industry, and their salary information.

In addition, to enhance wage data collection and ensure data accuracy, the SWIS file was implemented. The integration of data from this file into the PRIS allows us to obtain more precise and validated information about participants who have received services under the WIOA program and have obtained exit dates.

While Title II and Title IV programs do not enroll their participants in the PRIS, they have signed the SWIS agreement, granting them access to the information. These programs have their own protocols for requesting salary information from the DTRH. In summary, Puerto Rico established an effective system for using quarterly UI wage records as a source of information to meet accountability and evaluation requirements for programs under the Workforce Innovation and Opportunity Act. This ensures data accuracy and transparency during the execution of the programs.

(D) *Privacy Safeguards.* Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by Section

444 of the General Education Provisions Act (20 U.S.C. 1232 g) and other applicable Federal laws.

The State complies with Section 444 of the General Education Provision Act, Section 2(c)(2) of the Rehabilitation Act of 1973, Section 49l-2(a)(2) of the Wagner Peyser Act, 2 CFR 200.303, OMB Uniform Guidance, and any other applicable provisions. It also complies with all relevant local provisions, including those identified by the Puerto Rico Institute of Statistics, pertaining to the access, dissemination, and confidentiality of government information.

The PRIS Management Information System is a role-based system with specific permissions granted depending on the individual's role. Confidential information is protected within the system by restricting access to view, enter, or edit data to specific security roles or privileges. Access to the system is granted by users with specialized administrative rights, and administrative users' accounts are monitored periodically to ensure that rights have been granted only to appropriate staff.

(7) Priority of Service for Veterans.

(A) 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 in section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the DOL.

In compliance with the Jobs for Veterans Act, codified in section 4215 of 38 U.S.C., and the Workforce Innovation and Opportunity Act (WIOA), Puerto Rico is committed to prioritizing service provisions for covered persons. The State has a multi-layered approach to ensure that these individuals are prioritized in all employment and training programs funded, either fully or partially, by the Department of Labor (DOL). The D.O.L has meticulously aligned its State Unified Plan with this federal legislation, ensuring that all policies, procedures, and guidelines are in full compliance with section 4215 of 38 U.S.C.

1. Identifying Covered Persons

- Definition: A "covered person" includes the veterans and spouses of certain veterans. This definition is in line with the Jobs for Veterans Act of 2002 and PRDOLHR's commitment to identifying veterans, veterans with disabilities, and eligible persons.
- Scope: The priority of service provisions are applicable to all employment and training programs funded in whole or in part by the DOL, including but not limited to programs under WIOA, the Wagner-Peyser Act, and other specialized programs.
- Data Collection: Application forms should include specific questions to identify veterans and eligible spouses, as outlined in the Strategic Plan implemented by Wagner-Peyser.
- Verification: The PRIS will be used to verify the status of veterans and eligible spouses, aligning with the PRDOLHR's strategy to confirm the priority of service.
- Specialized Staff: The Veteran Program Coordinator (JVSGC) and Wagner-Peyser merit staff are responsible for overseeing the identification process, ensuring that the priority of service is granted to the correct individuals.
- Data Security: Given that personal information will be collected and verified, it is crucial to outline the measures that will be taken to secure sensitive data.

2. Priority of Service

- Legal Mandate: The law mandates that covered persons must be given priority over non-veterans for employment, training, and placement services. This is reinforced by the PRDOLHR's commitment to establishing relationships with various agencies to ensure service priority.
- Resource Allocation: Priority will be provided by the Wagner-Peyser merit staff, and the Veteran Program Coordinator (JVSGC) will oversee compliance.
- Service Tiers: Different tiers of service could be established to prioritize veterans with significant barriers to employment, such as homelessness or disability, as defined in the 2020 WIOA State Unified Plan.

- Customization: Services are customized based on the individual needs of the covered persons, ensuring that they receive the most relevant and effective support.
- Ensure that the advanced analytics tools used for real-time monitoring comply with data privacy laws and are accessible to all users.
- Appeals Process: An appeals process should be in place for individuals who believe they have been wrongly denied the priority of service.

3. Implementation by State and Local Workforce Investment Boards
    - Guidance: The Office of Workforce Investment provides specific guidelines that are further detailed in the PRDOLHR's Strategic Plan.
    - Local Implementation: Local Workforce Investment Boards are responsible for on-the-ground implementation, including training staff members and periodic reception and Labor Exchange Staff reinforcement, as outlined in the 2020 WIOA State Unified Plan.
    - Performance Metrics: While you mentioned key performance indicators, specific metrics for success could be further elaborated to ensure methodological monitoring.
    - Inter-agency Collaboration: The PRDOLHR is committed to establishing relationships with a wide range of organizations, including municipalities, colleges, and faith-based organizations, to ensure a comprehensive approach to service priorities.
    - Partnerships: Memorandums of Understanding (MOUs) will be established with these entities to formalize roles, responsibilities, and resource sharing.
    - Stakeholder Input: Consider obtaining feedback from veterans' organizations and other stakeholders to ensure that the program meets the needs of the community it serves.
4. Monitoring Compliance
    - DOL Oversight: The U.S. The Department of Labor has the authority to monitor and enforce compliance. This is further supervised by the JVSGC in Puerto Rico.

- Audits: Regular internal and external audits should be conducted, aligned with PRDOLHR's commitment to data and report validation.
- Real-time Monitoring: Advanced analytics tools can be employed to provide real-time monitoring of service provision, ensuring immediate corrective action if discrepancies are found.
- Data-driven decision-making: These analytics will also inform future policy decisions, ensuring that the program evolves based on empirical data rather than theoretical models.
- PACT Act: The PACT Act has an open enrollment period for post-9/11 combat veterans who meet specific criteria. This is particularly relevant for Puerto Rico given its high veteran population.
- Healthcare Benefits: The VA in Puerto Rico focuses on comprehensive healthcare coverage, which could be a selling point for attracting veterans to DOL-funded programs.
- Technology: VA's commitment to providing accessible technology can be leveraged to make DOL-funded programs more accessible and efficient.
- Skill Matching: Advanced AI algorithms could be used to match veterans with the most suitable employment opportunities based on their skills and preferences.
- Legal Review: Given the legal implications, it would be prudent to have this document reviewed by legal experts familiar with federal and state employment laws.
- Performance Metrics: While you mentioned key performance indicators, specific metrics for success could be further elaborated to ensure methodological monitoring.
- Whistleblower Protection: Procedures should be in place to protect employees who report non-compliance from retaliation.

By adhering to these guidelines and continually monitoring the effectiveness of the priority service provisions, Puerto Rico can ensure compliance with the Jobs for Veterans Act. Given the specific needs and resources of Puerto Rico, the implementation strategy may vary;

however, the core principles remain the same. This detailed approach ensures a robust, compliant, and effective implementation of the priority of service provisions for covered persons in strict accordance with the Jobs for Veterans Act and other relevant legislation.

(B) Describe how the State will monitor priority of service provisions for veterans.

This section elaborates on the oversight mechanisms in place to monitor compliance with the priority of service provisions. This includes data collection methods, audit procedures, and staff training programs aimed at ensuring effective implementation.

1. Data Collection and Reporting

   The Puerto Rico Department of Labor and Human Resources (PRDOLHR) will utilize PRIS and its robust data collection and reporting system to monitor compliance with the priority of service provisions. This system tracks key performance indicators, such as the number of veterans served, types of services provided, and outcomes achieved.

2. Third-party Audits: Third-party audits should be used for unbiased assessment of compliance.

3. Audits and Inspections

   Regular audits and inspections will be conducted by the U.S. The Department of Labor (DOL) and the Veteran Program Coordinator (JVSGC) ensure that all workforce development programs comply with the Jobs for Veterans Act of 2002. These audits will include a review of the collected data and may involve site visits to local American Job Centers (AJCs).

4. Staff Training and Reinforcement

   Staff members will undergo periodic training to ensure that they are well-versed in the priority of service provisions. Wagner-Peyser staff will continue to announce and provide priority of service to veterans according to Federal law and applicable regulations.

5. Public Awareness

The workforce system network in Puerto Rico keeps the public informed about the Priority of Service entitlement to veterans, covered persons, and eligible spouses through announcements posted on bulletin boards and near the entry service delivery point.

(C) 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.

This section describes the triage and referral processes in place to direct eligible veterans and other specified populations to appropriate services. It details the roles of Disabled Veterans' Outreach Program (DVOP) specialists and other key personnel in this process.

DVOP Specialists

DVOP specialists focus on providing intensive services to meet the employment needs of veterans, particularly those who are economically or educationally disadvantaged, including homeless veterans, veterans with disabilities, and veterans who face other significant barriers to employment.

Roles and Responsibilities of DVOP Specialists:

a. Intensive Case Management: DVOP specialists provide individualized career services, including comprehensive assessments, the development of individual employment plans, and career counseling.
b. Skill Identification: They help veterans identify their skills, including transferable skills from their military service, and match them with suitable employment or training opportunities.
c. Resource Navigation: DVOP specialists guide veterans through various federal, state, and local resources available for job training, employment placement, and other support services.
d. Employer Liaison: They often function as a bridge between employers and veterans, helping to identify job openings and facilitating job placements.

e. Special Populations: DVOP specialists are trained to work with special populations of veterans, such as those with disabilities, to ensure that they receive appropriate accommodation in the workplace.
f. Follow-Up Services: They provide follow-up services to ensure that veterans remain employed and address any issues that may arise post-placement.
g. Reporting and Compliance: DVOP specialists are responsible for maintaining accurate records of their activities and outcomes, which are used for program evaluation and compliance with federal regulations.
h. Training and Development: They often engage in continuous professional development to stay updated on best practices in veterans' employment services.

Jobs for Veterans' State Grants (JVSG)–U.S. Department of Labor

Disabled Veterans' Outreach Program (DVOP)–U.S. Department of Labor

By providing these specialized services, DVOP specialists play a crucial role in helping veterans transition successfully from military to civilian life, particularly those facing significant barriers to employment.

1. Initial Identification and Verification

Upon entering AJCs, veterans and eligible spouses are notified of their priority right of service under the Wagner-Peyser Act, as amended by the Workforce Innovation and Opportunity Act (WIOA). Specialized staff, including Wagner-Peyser merit staff and JVSG Disabled Veterans' Outreach Program (DVOP) specialists, will identify eligible veterans. Verification through the required paperwork will be conducted, especially if eligibility is determined.

2. Triage Process

Veterans and eligible spouses are triaged based on their specific needs and barriers to employment. Those meeting the definition of a Veteran with Significant Barriers to Employment will be referred to as one of the JVSG DVOP Specialists for the provision of services. This includes services such as re-employment orientation, individualized career assessment, and job search assistance.

Training and Development for DVOP Specialists: DVOP specialists should engage in continuous professional development to stay updated on best practices in veterans' employment services.

Emergency Response: Procedures for immediate responses to urgent cases, such as veterans with acute mental health issues, should be outlined.

3. Referral to DVOP Specialists

Veterans meeting specific criteria, such as being a special disabled or disabled veteran, homeless, recently separated, etc., will be referred to DVOP specialists for intensive services. These services are designed to address the unique challenges faced by these populations, and may include focused case management services, re-employment orientation, individualized career assessment, and job search assistance.

By incorporating these detailed strategies and mechanisms, Puerto Rico aims to comply fully with the Jobs for Veterans Act, ensuring that veterans and their eligible spouses receive priority of service to which they are entitled. This comprehensive approach involves multiple stakeholders, including federal and state agencies, local workforce development boards, and community organizations, all working in concert to serve this important population effectively.

(8) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities. Describe how the one-stop delivery system (including one-stop center operators and one-stop delivery system partners) will comply with Section 188 of the 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 must also include a description of compliance by providing staff training and support to address the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

Section 188 of the Workforce Innovation and Opportunity Act (WIOA) prohibits discrimination against individuals who apply to, participate in, work for, or contact

programs and activities that receive financial assistance from the Department of Labor (DOL). This includes discrimination based on disability. Section 188 also mandates that reasonable accommodations be provided to qualified individuals with disabilities. The DOL has issued regulations implementing Section 188 non-discrimination requirements that apply to programs or activities offered through the American Job Center (AJC) system, also known as the one-stop delivery system.

Puerto Rico's workforce system must be prepared to serve jobseekers from diverse backgrounds facing different barriers. Positive outreach encompasses both the physical accessibility of all facilities, as well as programmatic accessibility, particularly with customers' access needs. This will allow for better integration of service delivery and coordination among workforce system partners. Advances in personal computing and telecommunications technology have enabled the provision of services tailored to each participant's needs to be delivered with ease directly to their homes.

The success of this program depends on the values and actions that local Workforce Development Boards and their partners use to guide their planning and operations, which they must consider as follows:

1) Integrated: Think and function as an integrated system of partners that share common goals with services delivered by various organizations with the best capabilities for a seamless customer experience.

2) Accountable: Committed to high-quality customer services with regular program performance review based on shared data and actions that enhance outcomes.
3) Affirmative Outreach: Meets the needs of customers by ensuring affirmative outreach to programs, services, and activities for all eligible individuals.
4) Continuous Improvement: Create a delivery system that utilizes feedback from employers and current and future jobseekers to challenge the status quo and innovate to drive measurable improvements.

5) Partnership: Address to align goals, resources, and initiatives with economic development, business, labor, and education partners.
6) Regional Strategy: Work with counterparts to address broader workforce needs of the regional economy and leverage resources to provide a higher quality and level of services.

WIOA requires that there be at least one physical one-stop career center in each local area. To achieve the goal of increased access, Puerto Rico must consider three process levels:

1) Comprehensive
    a. Accessible to the public during regular business days as well as physical and programmatic access to individuals with disabilities.
    b. Portal sites for electronic access.
    c. Provider of basic and individualized career services, educational services, and training services.
    d. Provider of business services.
    e. Representation of partners.
    f. Additional related employment and training resources.

2) Affiliated
    a. Access to the public is physically and programmatically accessible to individuals with disabilities.
    b. Portal sites for electronic access.
    c. Providers of Basic Career Services.
    d. Representation of one or more mandated partners.
    e. Additional related employment, education, and training resources.
    f. Established working relationships as part of an integrated system of WorkSource sites.
3) Connection

a. Accessible to the public with barriers outlined in WIOA, which include physical and programmatic access to individuals with disabilities.
b. Portal sites for electronic access.
c. Providers of Basic Career Services.
d. Additional related employment and training resources.
e. Established working relationships as part of an integrated system of WorkSource sites.

To maximize the efforts of all participants with access to services, each one-stop site must:

1) Describe how their site works cooperatively with WIOA's core partners to provide quality services to all customers. Describe their outreach to populations with barriers in the community and their relationships with core programs and community partners to effectively serve them.
2) Provide evidence that basic ADA requirements are met.
3) Describe initiatives or strategies in developing positive outreach, provide tangible evidence of implementation or solution-driven plan development, and address the following four specific areas of access:
    a. Physical: Architectural or building
    b. Information: All the official documents printed, and materials posted.
    c. Digital: Software, web-based programs, and print alternatives.
    d. Communication: Verbal and non-verbal access to services, phones, and others.
4) Describe the wireless Internet infrastructure.
5) Address how the needs of populations with barriers are met through staff assistance and other means.
6) List any best practices to highlight and share for continuous improvement.

In Puerto Rico, Title I and the PRVRA will lead the efforts to adapt the USDOL Office of Disability Employment Policy's (ODEP) recommendations contained in its "Promising Practices in Achieving Universal Access and Equal Opportunity: A

Section 188 Disability Reference Guide". The resulting guidance will be adopted by the State Board and mandated to all local areas as part of the local area certification and operator competitive selection processes.

Assessment of Accessibility to Individuals with Disability

At least once every three years, local boards must assess the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers and delivery systems. Considering this point, local boards determine appropriate actions to address the necessary policies and procedural modifications. This assessment also provides feedback to the local board, which supports the development of local planning goals.

WDP has utilized two mechanisms to conduct assessments of the workforce system, and these are the following:

1) One-Stop Certification Process: The State Board Certification Criteria provides a certification tool and outlines the certification process. At least once every three years, local boards must access the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers and delivery systems.

2) One-Stop System Monitoring: The monitoring of compliance with accessibility for individuals contains the following evaluation elements:

    a. Designation of Equal Opportunity Official: An Equal Opportunity Officer (EOO) has been appointed (29 CFR 38.23)

    b. Equal Opportunity and Non-Discrimination Policy Dissemination: Procedures or methods are in place to ensure communication with persons with disabilities. The Monitoring and Compliance Office conducts an annual inspection of auxiliary aids and services to ensure communication with disabled individuals.

c. Review Of Commitment, Plans, Contracts and Procedures: The entity ensures that each applicant for funds and training providers interested in being eligible for receipt of funds under Title 1 of WIOA includes, in their application, the commitment to comply with the laws and regulations prohibiting discrimination outlined in 29 CFR 38.20(a).

d. Universal Access: This includes the following:

    i. The subrecipient has made efforts to broaden the composition of groups considered for participation or employment to include members of both sexes, racial and ethnic groups, individuals of various ages, and individuals with disabilities, including the following efforts (29 CFR 37.42):

        1. The subrecipient has a method to make reasonable accommodations and modifications available to individuals with disabilities section 29 CFR 38.8.

    ii. The subrecipient physical facilities provide structural access to persons with disabilities, such as 29 CFR 38.4(2) and 38.9(e):

        1. The subrecipient provides auxiliary aids and services when necessary to afford individuals with disabilities the opportunity to participate and enjoy the benefits of Title I of WIOA. The primary consideration for providing such aid and services is the requests of individuals with disabilities section 29 CFR 38.9(b).

        2. If the subrecipient communicates via telephone with beneficiaries, registered individuals, eligible

applicants, participants, job seekers, and/or employees, the same utilizes telecommunication mechanisms for individuals with hearing impairments (TDD/TTY). or equally effective communication systems section 29 CFR 87.9 (c).

3. The subrecipient has signs at the main entrance of those facilities with no access, directing the public to a location where they can obtain information about accessible facilities. These signs meet the requirements prescribed by the General Service Administration in 41 CFR 102-76/Regulation section 29 CFR 38.9 (e) (1).

4. The eligibility criteria used for the participation of individuals in programs or activities under Title I of WIOA provide individuals with disabilities equal opportunity and access to the benefits, aids, training, programs, or activities provided to other individuals, section 29 CFR 38.7 (i), (j) and (l).

e. Data and Information Collection and Record-Keeping

i. The Entity has designed procedures for data and information collection and record keeping.

ii. The VRA also collaborates with the American Job Center, allowing them to use our accessibility study to access the compliance of their facilities with legislation:

1. Expansion of the availability of information resources or training for new recruitment staff through the agency's internal page (Intranet).

2. It continues with the use of remote interpretation video technology for the deaf.

Staff Training and Support for Compliance

- Reasonable Accommodations: The document states that training and support services must be provided to qualified individuals with disabilities unless doing so would cause undue hardship. This is in line with 29 CFR 37.8 and 29 CFR 32.13. (Page 54)
- Reasonable Modifications: It is necessary to provide reasonable modifications to policies, practices, and procedures for the registration and provision of career, training, and support services to individuals with disabilities. Unless such modifications fundamentally alter the nature of the service, program, or activity. (Page 54)
- Integrated Setting: Programs and activities must be administered in the most integrated setting appropriate to the needs of qualified individuals with disabilities. (Page 54)
- AJC Staff Responsibilities: American Job Center (AJC) staff are instructed not to automatically refer jobseekers with disabilities to State vocational rehabilitation programs. Referrals are made based on whether the individual would benefit from such services, in addition to other programs and services available in the AJC. (Page 35)
- Universal Access and Equal Opportunity: The document outlines various sections dedicated to ensuring equal opportunities, including providing reasonable accommodations and modifications, effective communication, and program accessibility. (Page 3)
- Prohibitions and Modifications: The document mentions that compliance involves adhering to prohibitions and providing reasonable accommodations and modifications. It also involves administering

programs in the most integrated setting to ensure effective communication. (Page 9)

- Monitoring and Continuous Improvement: There should be ongoing monitoring for compliance and continuous improvement.

Source Document: "Promising Practices in Achieving Universal and Equal Opportunity: A Section 188 Disability Reference Guide" by the US Department of Labor, Office of Disability Employment, Pages 3, 9, 35, 54, 56, 57.

(9) Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners. Describe how the one-stop delivery system (including one-stop center operators and 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 core programs for which they are eligible.

Among other things, the WIOA Act establishes that accessibility is guaranteed to participants, regardless of the language in which they communicate. This law has been implemented in the diverse multilingual environments of the 50 states in the United States, where a wide range of languages are spoken. In the case of Puerto Rico, although there is a need to provide services in different languages, the established public policy requires that the official languages in which agencies and instrumentalities must offer services and access to information be Spanish and English.

To comply with both the Public Policy established in the document entitled Transparency and Disclosure Requirement (Sunshine Provision) of the activities of local boards under the Workforce Innovation and Opportunity Act (DDEC-WIOA-01-2021), effective April 8, 2021, by the Government of Puerto Rico, as well as the regulations established in the WIOA law and the Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, we developed the following actions to achieve the following important objectives:

- Evaluation: It is essential to conduct a comprehensive needs assessment to identify specific challenges and opportunities that exist in the population to receive this service. This assessment should include demographics, language proficiency levels, challenges in accessing services, and data collected by the United States Census Bureau.
- Development: Develop and implement comprehensive language access plans for each local area. These plans should describe strategies for providing language assistance services to the participants, such as interpretation and translation.
- Training: Training staff who provide services in the local area, including front-line employees, case managers, language development, and understanding of other cultures.
- Recruitment: Recruiting bilingual or multilingual staff members who can communicate with participants in their speech language is essential. Staff highly trained in multilingual communication will significantly improve accessibility to services.
- Tool Identification: Identify free or low-cost translation software that performs text-to-text, text-to-speech, and speech-to-text translations to provide support and service to potential multicultural clients visiting local areas.
- Document Repository: Developing a repository of documents translated into various languages spoken by participants is essential. This repository should include outreach materials, application forms, program brochures, and other resources needed to access services.
- Video Resources Repository: Create concise instructional videos in additional languages that illustrate how one can aid someone seeking services within their local vicinity.
- Collaborative Alliances with Third Sector: Establish collaborative alliances with the Consular Corps of Puerto Rico (CCPR) for interpretation services in other languages. The CCPR is a nonpolitical, secular, and non-profit institution established under the laws of Puerto Rico. It has consuls from 31 countries, is accredited in the US, is officially represented in Puerto Rico, and serves its resident citizens. This agreement aims to establish guidelines for interpreting services in various languages that can be provided in either local or virtual settings. These can collaborate in the translation of brochures and service documentation such as eligibility criteria. Likewise, they can collaborate in the review of nondiscriminatory policies. In addition,

they could collaborate in the dissemination of services offered by the local area and serve as a bridge for the participants.

- Collaborative Alliances with Government Resources: The Immigrant Counseling and Services Office was established in 2020, pursuant to Law No. 254 of October 28, 2000, by the Department of State of Puerto Rico. Devoted to handle matters of immigrants residing in Puerto Rico. Collaborates in coordinating services among foreign residents to facilitate prompt handling and monitoring of their cases in Local Areas.
- Outreach Campaigns: Guaranteeing equal opportunity in the receipt of services and launching an outreach campaign in the main media, social networks, and service offices where multilingual services are offered in local areas is known. In the AJC, documents are available in the respective translations of the main languages of older speakers. If an individual of some kind who does not have the translation of documents requests services, the translation service will be requested by one of the organizations with prior agreements.

By implementing these initiatives in Local Areas, they can better adapt to the needs of participants in the language of their preferences and ensure equitable access to essential employment and training services.

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.

The Puerto Rico State Plan Advisory Committee and Joint Policy Workgroup have played a pivotal role in the development and coordination of the Unified State Plan of Puerto Rico 2024. The collaborative effort involves representatives from key programs, with the Department of Economic Development and Commerce serving as the lead executor. This review focuses on the planning process, collaborative efforts, and key responsibilities undertaken by both state and local entities in aligning workforce policies and services with regional needs.

Unified State Plan Development:

The establishment of a WIOA Unified State Plan Review Task Force, In PR is led by the Title I-B; signifies a concerted effort to create an integrated, aligned, and viable WIOA Unified State Plan. The advisory team, comprising representatives from major programs, such as Adult Education and Family Literacy Act, Wagner-Peyser, and Vocational Rehabilitation Program, has been instrumental in the review of the Unified State Plan for 2024.

Strategic Planning Process:

The planning process commenced with comprehensive meetings with representatives of major programs to assess the implementation of strategies outlined in the Unified and Conditionally Approved Plan 2022. The goal was to identify achievements and areas for improvement, incorporating new strategies to enhance services. Collaboration with programs such as Adult Education, Employment Services for Older Workers, and Vocational Rehabilitation has been integral to this process.

Local Workforce Development Boards and Chief Elected Officials:

At the local level, the involvement of Local Workforce Development Boards (LDBs) and Chief Elected Officials (CEOs) in the design and governance of the system is essential. Their responsibilities include conducting workforce studies, collaborating with system partners to develop local plans, and establishing public policies in line with state directives. Additionally, efforts are directed towards engaging employers, implementing career pathways, utilizing technology, and ensuring accessibility in accordance with WIOA and the ADA Act.

Certification of Single Management Centers:

A crucial aspect of the local board's responsibilities involves the annual evaluation of the physical and programmatic accessibility of Single Management Centers, aligning with WIOA and ADA Act provisions. Certification of these centers, in accordance with 20 CFR Sec. 678.800, mandates that the Local Board cannot operate the Single Management Center.

Emerging Themes and Priorities:

The advisory team has highlighted three emerging themes in the WIOA State Plan: Maximizing access to employment, reviewing implemented strategies, and modernizing the workforce system. While addressing customer needs remains a priority, the cohesive vision for the workforce system emphasizes interagency collaboration strategies and multisectoral alignment.

Governor's State Workforce Development Board Approval:

Upon completion, the reviewed and refined Unified State Plan is presented for review and approval by the Governor's State Workforce Development Board of the State of Puerto Rico, ensuring alignment with state policies and objectives.

The collaborative efforts of the Puerto Rico State Plan Advisory Committee and Joint Policy Workgroup, in conjunction with state and local entities, reflect a commitment to enhancing workforce development strategies. The comprehensive review process underscores the dedication to achieving a cohesive vision for the workforce system in Puerto Rico.

V. COMMON ASSURANCES (for all core programs)

The Unified or Combined State Plan must include assurances that:	
1.	The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member rep- resents, and procedures to resolve such conflicts;
2.	The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;
3.	The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;

4.	(a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;
5.	The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to conduct 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 comply with WIOA section 188, Nondiscrimination, as applicable;
8.	The Federal funds received to conduct 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 conducting 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);

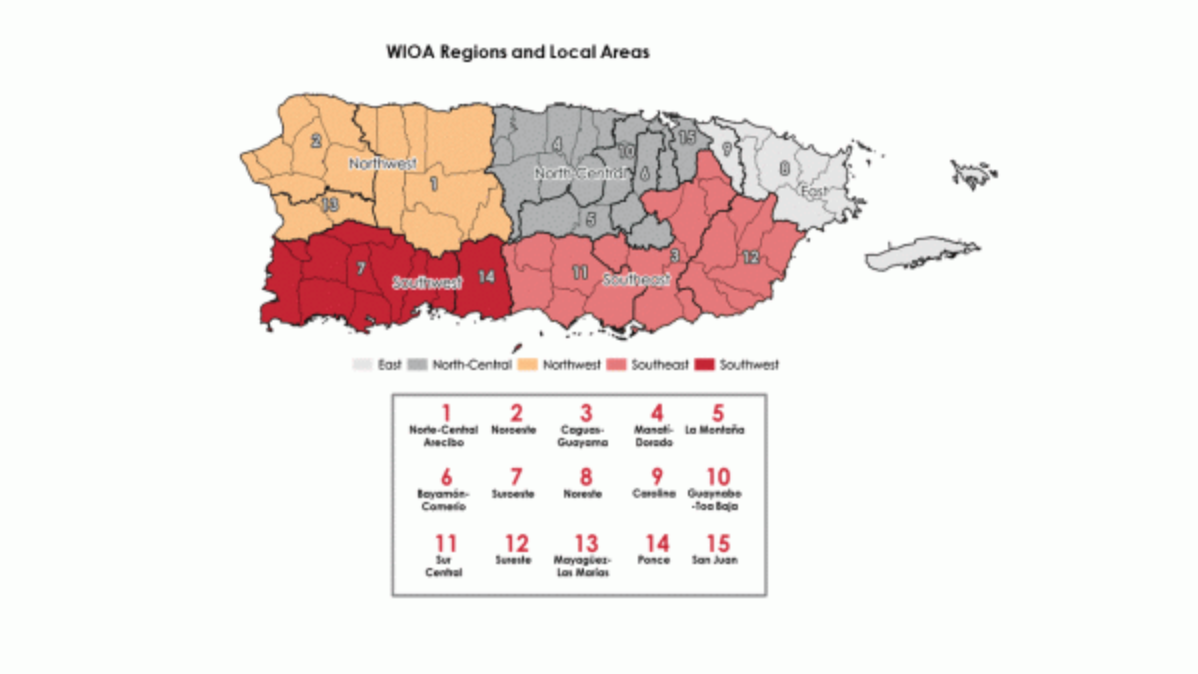
11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
12.	Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the DOL

VI. PROGRAM-SPECIFIC REQUIREMENTS 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. The Unified or Combined State Plan must include the following with respect to activities conducted under subtitle B—

In 2016, Puerto Rico's governor divided the economic development regions into five sectors based on the predominant economic activities influencing the island. Presently, these regions remain in effect, but the government is assessing their effectiveness and performance amidst ongoing economic fluctuations impacting the island. There is a contemplation of reorganizing these regions to align with emerging trends in the job market and the evolving requirements of both participants and employers, aiming for a more economically responsive structure.



The main characteristics of the regions are:

- Northwest: Known for its robust industrial cluster in computing, aerospace, and agriculture, contributing significantly to the local economy.
- Southwest: Diverse industries, including agriculture, ecotourism, hospitality, and logistics technology, shape the economic landscape of this region.
- North Central: Specializing in pharmaceuticals, biotechnology, logistics technology, health services, research and development, and medical tourism, these regions boast a dynamic economic profile.
- Eastern: Primarily focused on tourism and logistics technology, playing a key role in local and broader market economic activities.
- Southeast: Notable for concentrations in pharmaceuticals and agriculture biotechnology, including crop research and development, contributing substantially to Puerto Rico's economic fabric.

The Governor and State Board will collaboratively establish public policies and guidelines for developing regional plans within local areas. These policies align with the Workforce Innovation and Opportunity Act (WIOA) Regulations and include:

- Targeted technical assistance for local areas in regional planning and streamlined service delivery.
- Seamless alignment of regional plans with state economic development strategies.
- Integration of economic development initiatives by local government consortia.
- Seamless integration of industrial conglomerates and promotion of sectoral strategies.
- Adaptation of operating systems to prevailing economic trends.
- Strategic alignment of job training with market opportunities.
- Collaboration with the private sector for tailored participant recruitment and training.
- Evaluation and enhancement of work activity effectiveness through consortia engagement.
- Active participation in projects for sustaining and generating employment opportunities.
- Collaboration with business associations to stimulate economic growth.

Notably, Puerto Rico has 15 local areas with 17 American Employment Centers (AJCs), illustrated in the accompanying map, providing a visual representation of economic regions. Further details on each region and local area are in the subsequent section.

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

The process for designating local areas under WIOA, as outlined in state board policy DDEC-WIOA-02-2021, Involves considering initial and subsequent designations, including circumstances for local area resignation within economic development regions. The state board, advising the governor, designates local zones after consulting with local boards an elected official.

WIOA emphasizes a client-centric system, aligning services with regional needs. The governor, in collaboration with the state board, chief elected officers, and local boards, designates local areas for WIOA funds. PRDEDC serves as the designated WIOA Title 1 grantee, per EO-2014-64 AND ACT 171-2014. From prior designation to WIOA designation occurs through automatic designation or discretionary appointment, considering successful performance and fiscal integrity, as per state board administrative letter wioa-02-2021.

The state regulations are issued pursuant to sections 3 and 106 of WIOA, Act 171-2014, which transferred the WDP to the PRDEDC, and the Governor's EO-2014-64 which designated the PRDEDC as the grantee, administrator, and overseer of WIOA funds allocated to the State and established by the State Board.

The State Board Administrative Letter WIOA-02-2021, also promulgates a public policy to guide the process of reassigning local areas. In summary, the process of transitioning from a previously designated local area to being initially designated as a local area under WIOA can occur using one of two methods:

- Automatic designation. Under section 106(b)(2) of the WIOA, the Governor must approve an application from the area previously designated for initial designation under the WIOA, provided that there has been no change in the composition of the local zone; and during the 2 programmatic years prior to the adoption of WIOA approval, the local area "performed successfully" (during FYs 2012 and FY2013) and met the criteria for "sustained fiscal integrity."

- Discretionary appointment. Upon recommendation by the State Board, and pursuant to section 106(b)(4) of the WIOA, the Governor may approve an application by any general local government unit, including a combination of those units, for designation as a local area under the WIOA, if the State Board recommends and determines that the unit or units share a common labor market; share the same economic development area; and have federal resources available and non-federal, including education and training institutions, assigned for the service provision of services for the workforce.

At any time, the Governor may review the performance and results of a local area to assess whether it meets the requirements for subsequent designation.

Puerto Rico's five regions and 15 local areas are determined using THE CENSUS Bureau data on workflows, aligning with OMB statistical areas. The state office of wioa defines geographic labor markets based on home-to-work flows, ensuring rational regional planning. all local areas fall within specific regions, avoiding an excessively large labor market area. The current regions and local areas are detailed in the provided table.

Local and Regional Areas

Region	Municipality	Workforce Area
East	Carolina	Carolina
East	Canóvanas	Northeast
East	Ceiba	Northeast
East	Culebra	Northeast
East	Fajardo	Northeast
East	Loíza	Northeast
East	Luquillo	Northeast
East	Naguabo	Northeast
East	Río Grande	Northeast
East	Vieques	Northeast
North-Central	Bayamón	Bayamón-Comerío
North-Central	Comerío	Bayamón-Comerío
North-Central	Cataño	Guaynabo-Toa Baja
North-Central	Guaynabo	Guaynabo-Toa Baja
North-Central	Toa Alta	Guaynabo-Toa Baja
North-Central	Toa Baja	Guaynabo-Toa Baja
North-Central	Barranquitas	La Montaña

Region	Municipality	Workforce Area
North-Central	Cidra	La Montaña
North-Central	Naranjito	La Montaña
North-Central	Orocovis	La Montaña
North-Central	Barceloneta	Manatí-Dorado
North-Central	Ciales	Manatí-Dorado
North-Central	Corozal	Manatí-Dorado
North-Central	Dorado	Manatí-Dorado
North-Central	Florida	Manatí-Dorado
North-Central	Manatí	Manatí-Dorado
North-Central	Morovis	Manatí-Dorado
North-Central	Vega Alta	Manatí-Dorado
North-Central	Vega Baja	Manatí-Dorado
North-Central	San Juan	San Juan
Northwest	Las Marías	Mayagüez-Las Marías
Northwest	Mayagüez	Mayagüez-Las Marías
Northwest	Moca	Noroeste
Northwest	Rincón	Noroeste
Northwest	San Sebastián	Noroeste
Northwest	Jayuya	Norte-Central Arecibo
Northwest	Lares	Norte-Central Arecibo
Northwest	Adjuntas	North-Central Arecibo
Northwest	Arecibo	North-Central Arecibo
Northwest	Camuy	North-Central Arecibo
Northwest	Hatillo	North-Central Arecibo
Northwest	Quebradillas	North-Central Arecibo

Region	Municipality	Workforce Area
Northwest	Utuado	North-Central Arecibo
Northwest	Aguada	Northwest
Northwest	Aguadilla	Northwest
Northwest	Añasco	Northwest
Northwest	Isabela	Northwest
Southeast	Aguas Buenas	Caguas-Guayama
Southeast	Aibonito	Caguas-Guayama
Southeast	Arroyo	Caguas-Guayama
Southeast	Caguas	Caguas-Guayama
Southeast	Cayey	Caguas-Guayama
Southeast	Guayama	Caguas-Guayama
Southeast	Gurabo	Caguas-Guayama
Southeast	Trujillo Alto	Caguas-Guayama
Southeast	Coamo	South Central
Southeast	Juana Díaz	South Central
Southeast	Santa Isabel	South Central
Southeast	Villalba	South Central
Southeast	Humacao	Southeast
Southeast	Juncos	Southeast
Southeast	Las Piedras	Southeast
Southeast	Maunabo	Southeast
Southeast	Patillas	Southeast
Southeast	San Lorenzo	Southeast
Southeast	Salinas	Sur Central
Southeast	Yabucoa	Sureste

Region	Municipality	Workforce Area
Southwest	Ponce	Ponce
Southwest	Cabo Rojo	Southwest
Southwest	Guánica	Southwest
Southwest	Guayanilla	Southwest
Southwest	Hormigueros	Southwest
Southwest	Lajas	Southwest
Southwest	Maricao	Southwest
Southwest	Peñuelas	Southwest
Southwest	Sabana Grande	Suroeste
Southwest	San Germán	Suroeste
Southwest	Yauco	Suroeste

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

The state policy DDEC-WIOA-02-2021 outlines the process for seeking initial designation of local areas to administer WIOA funds, including the appeal procedure for adverse determinations. If a local area disagrees with a different determination and seeks revision, it can submit a reconsideration statement to the State Board within 15 calendar days of receiving the notification. The State Board will issue a final determination within 15 calendar days of receiving the review requested. If denied, the local entity can appeal to USDOL within 30 calendar days of receiving the State Board's determination.

The appeal process for local area designation is as follows:

The content of the State Policy on the Local Area Designation Appeal Process is as follows:

1. A unit of general local government or grant recipient not granted local area designation can submit a written appeal to the Department of Economic Development and Commerce (DEDC) within 14 days of the decision.
2. The appeal, addressed to the Secretary of DEDC and the President of the State Workforce Development Board, must state specific grounds for the appeal.
3. The State Board reviews the appeal within 60 days, considering both the original request and any supplemental information provided.
4. The Governor makes the final decision.
5. If the appeal is related to an initial designation request and does not result in designation, the entity may request a review by the Secretary of Labor within 14 days to assess procedural rights and WIOA Section 106(b)(2) or Section 106(b)(3) criteria:

Assistant Secretary of Employment and Training
United States Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

A copy of the appeal must be simultaneously provided to the:

ETA Regional Administrator
United States Department of Labor
John F. Kennedy Federal Building
Room E-350
Boston, Mass 02203

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

MOUs and IFAs State Policy

The Workforce Development Program, on May 5, 2017, approved the "Carta Circular WIOA-01-2017 Memorandum of Understanding MOU" policy. As per WIOA, One-Stop partners have the right to appeal the determination of funds allocated for One-Stop infrastructure costs and can request a hearing. The appeal, along with the hearing request, should be sent in writing to the State Board within 21 calendar days from the Local Board's infrastructure cost determination.

One-Stop partners also have the option to appeal against the governor's decision concerning their share of funds for infrastructure costs. Additionally, a Grievance and Complaint Policy is currently under consideration by the State Board, applicable to entities and individuals appealing decisions at the local or state levels.

The appeals process for infrastructure funding determinations is outlined as follows:

1. The governor, with SWDB assistance, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.
2. Any required partner can appeal the governor's determination based on claims that it is inconsistent with the proportionate share requirements or cost contributions caps stated in 20 CFR 678.735(a), 20 CFR 678.736, and 20 CFR 678.738.
3. The process ensures prompt resolution of the appeal for timely fund distribution, aligning with the requirements of 20 CFR 683.630.
4. Appeals must be submitted formally in writing via registered mail within 21 days of the governor's determination, no later than 15 days from receiving the notice of denial or revocation.

2. Statewide Activities

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

The Planning Guidelines are the official document that sets out public policy and requirements for allocating local area funds for Youth, Adult, and Displaced Worker programs. Consistent with WIOA regulations, priorities, and objectives, state planning will address the service needs of specific populations and minorities, as well as those of participants and employers. The annual Planning Guidelines compile state and federal public policies regarding the management of WIOA funds. The design of this guide is to ensure compliance with ETA policies and objectives, as outlined in the Training and Employment Guidance Letters (TEGLs), Training and Employment Notices (TENs), WIOA Final Rules, as well as State Board policies. For more details, see ***State Policies and Procedures.***

On May 5, 2017, the Workforce Development Program approved the policy: "Circular Letter WIOA-01-2017 Memorandum of Understanding MOU". According to WIOA, One-Stop partners can appeal the Governor's determination on the portion of the funds to be provided for the cost of One-Stop's infrastructure and request a hearing. For this process, they must mail a written appeal and a request for a hearing within 21 calendar days of the Governor's infrastructure cost determination.

In the appeal, you must state the reasons for the appeal. The appellant must describe how the Governor's infrastructure cost determination is inconsistent with the proportionate participation requirements, cost contribution limitations, and/or cost contribution limits, in accordance with Section 678.750(b) of the WIOA Notice of Proposed Rulemaking.

The appellant will be contacted within 10 calendar days of the receipt of the appeal and a hearing date will be scheduled. To ensure a prompt resolution of the appeal and distribution of funds in a timely manner, the appellant will receive a written decision no later than 15 calendar days after the hearing.

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

Governor set-aside funds

Statewide activities funds are being used and prioritized to carry out the following required activities:

- Operating a fiscal management and accountability system: The DEDC has established, in accordance with the Workforce Innovation and Opportunity Act (WIOA) Section 116(i), fiscal control and fund accounting procedures that are necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for adult, dislocated worker, and youth programs to carry out workforce investment activities.

1. Dissemination of the State's list of Eligible Training Providers: Section 122(c) of WIOA mentions that states must have an application procedure for providers and training programs, in order to maintain their eligibility and the eligibility of their programs. States, in partnership with local boards, their partners, and the One-Stop system, play a leading role in ensuring the success of the system of eligible training providers. The Eligible Training Provider List (ETPL) module, part of PRIS, is an important tool for participants seeking training or skills enhancement to identify appropriate providers and relevant information, such as program cost and outcomes. With PRIS, career planners can make it easier for participants to identify training providers that offer programs in high-demand, economically trending industries that result in greater well-being and economic development. This system will provide up-to-date information on in-demand occupations, training programs that address employers' skills needs, and information on available jobs and occupations.

1. Technical Assistance to local areas: The State will publish quarterly performance results for all local areas. The availability of these reports allows the State and local areas to monitor

performance results in order to establish trends and identify areas or administrative processes that require corrective action. WIOA program staff will monitor performance, identify issues, and provide technical assistance as needed.

2. Programmatic reviews ensure that the workforce development system achieves quality program outcomes that meet the requirements and objectives of WIOA and federal and state regulations. Puerto Rico will continue to evaluate the effectiveness of local programs through programmatic reviews and oversight activities for the entire workforce development system. WIOA's programmatic reviews will provide guidance and direction to local programs to foster quality workforce development to our clients and identify new opportunities under WIOA. Program reviews also provide an opportunity to disseminate information about effective program practices throughout the workforce development system. State staff will continue to conduct programmatic reviews to ensure effective monitoring and oversight of grants. These reviews will be carried out through the integration of various administrative activities such as on-site monitoring, quarterly document reviews, technical assistance and ongoing training.

3. Use of DEDC Monitoring Guidelines by WIOA State Coordinators is required. In addition, the Monitoring Guides are living documents that are regularly updated to reflect changes in legislation, regulations and/or policy and changes in economic trends, as well as to include any improvements that make the guides easier and more effective to use.

1. Evaluations: Evaluations: The State will conduct evaluations and research projects on activities under WIOA's core programs. Its main objective is to establish and promote methods to improve such activities that allow for high-level performance within the state workforce system. Such projects will be coordinated and designed in conjunction with state and local boards and state agencies responsible for the administration of all respective core programs. Evaluations will include analysis of customer feedback, job placement outcomes, training, and process measures for the labor investment system, as needed.

In addition to funding the WIOA activities mentioned above, state activity funds are being used for those activities deemed essential to the basic functions of the workforce investment system. This includes oversight of local workforce investment boards and WIOA programs. The activities permitted with the use of these funds are as follows:

- State Level Administration includes the following functions:
    - Staff costs for program oversight and monitoring.
    - Participant Records Information System (PRIS) and related personnel costs: The state uses a single, integrated data collection system, known as the Participant Records Information System. This ensures that all local providers collect, report, and maintain the same data elements.
- Special Projects Funding: Funds have been set aside that could include, but are not limited to, workforce and economic needs for information and data, support for state planning activities around WIOA, support for regional and local activities, surveys, and evaluations. Funds can also be used to provide additional support to local board operations.
- Professional Development and Capacity Building Funds for our workforce development system: Funds will be allocated to support activities that meet the strategic plans and needs of local employers for a skilled workforce. In addition, funds can be used, among others, to support state and local partnerships to build equitable pathways to high-wage careers, improve the system's ability to provide opportunities where people with occupational barriers enter in-demand industrial sectors or occupations, and non-traditional occupations. This will allow the development and improvement of work performance and economic production level.

State Unit for Dislocated Workers and Employers – Rapid Response Services

The Department of Economic Development and Commerce facilitates the statewide Rapid Response services and serves as the recipient of plant closings or mass layoff notices required under the Worker Adjustment and Retraining Notification Act.

Rapid Response is a key component of Puerto Rico's strategy to create a unified local approach while working and providing a wide range of business services to employers. The Rapid Response service will promote a range of business services to support businesses at all stages of the business cycle. Early intervention facilitates a relatively quick and unhindered transition to employment or training, whether after a permanent shutdown or mass layoff, or a natural (or other) disaster resulting in massive employment dislocation.

The State Unit for Displaced Workers and Employers of DEDC's Workforce Development Program is in charge of Rapid Response services and coordinates the Trade Adjustment Assistance (TAA) Program. The Rapid Response process involves a unification of state agencies and local service providers, along with the private sector and organized labor. The goal of all stakeholders is to provide displaced workers with a variety of resources and technical assistance to support the transition to reemployment. State RR and TAA Coordinators participate in cross-training reemployment and assistance programs for each local area or region. Subsequently, the State RR and TAA Coordinators act as a liaison between the Local Workforce Development Boards (LWDBs), Wagner Peyser and PRDOLHR Unemployment Insurance, and applicable federal, state, and private resources to ensure that all information about reemployment and support services is available to assist employers and workers experiencing mass layoff or closure of a business plant.

The state has developed a comprehensive rapid response and TAA procedures, which will be continually reviewed to improve business engagement and layoff aversion services. The Rapid Response team begins the process by interacting with companies that have laid off or plan to lay off workers. Information about WIOA's TAA and Dislocated Worker Programs is provided to the company and, if applicable, union officials at this early stage. Meetings with workers are planned at this time to discuss available workforce programs in more detail.

State TAA and RR Coordinators thoroughly document displacement events, allowing for trend analysis and proactive strategy development. In addition, it organizes the necessary communications and coordinates relevant services to support affected workers. All these strategies are part of a system driven by demand and occupational trends, both of which are key to a comprehensive layoff aversion strategy.

Fund Allocation Policies

To ensure the fiscal integrity of the state fund, DEDC has developed the following public policies or procedures for the allocation of funds under WIOA and other federal programs:

DDEC-WIOA-11-20	Financial Reports- Close-Out Reports
DDEC-WIOA-10-20	Payroll Cost Allocation Policy - Guidelines and procedures for payroll base on budget
DDEC-WIOA-09-20	Cost allocation and fund reimbursement
DDEC-WIOA-06-20	TAA Definition of eligible displacement area
DDEC-WIOA-05-20	TAA Training - Requirements when approving Trade Adjustment Assistance (TAA) Training funds request.
DDEC-WIOA-RR-01-20	Policy for COVID-19 Layoff Aversion Fund
Waiver Policy	Operational Procedure for Implementing the Waiver for Business Capitalization
State Board Santions	Policy to establish the procedure for the determination of WIOA rules violations and the imposition of state board sanctions
DDEC-WIOA-04-2021	Faculty of local areas to pay a summer bonus as part of fringe benefits to their employees
WIOA-03-2021	Prohibition of the total closure of the One Stop Centers (OSC) during the administrative closures decreed by the municipalities
DDEC-WIOA-02-2022	Policy related to allowable expenses to travels paid with WIOA Funds

These procedures were approved by the State Board. In addition, the following procedures were included to ensure the fiscal integrity of the program:

- A single audit of the use of the funds is carried out once a year.
- Financial monitoring of the activities carried out with funds from the state reserve is carried out once a year.
- Contracts that exceed $10,000 must be referred to the Governor's office. If they exceed $50,000, they must also be sent to the OGP.
- The State Board is in the process of establishing public policy for the evaluation and approval of any delegation of funds from the state reserve.
- The State Board, through its Executive and Planning Committee, evaluates transactions of State Reserve funds that exceed $500,000. In addition, it requires a report of all projects developed with Reserve funds regardless of the amount of funds used.
- The WDP has a Planning Guide that is reviewed each program year to bring it in line with the public policies issued by DOLETA. It contains all instructions on the use of funds. This guide is also used for permitted state reserve activities.
- For the development of the activities required by the state, the DEDC develops competitive processes by publishing RFPs for the hiring of any professional service. There is a permanent Auction Committee, which is staffed by additional DEDC personnel who specialize in the service to be contracted. The DEDC follows the protocols and policies of the state OGP to develop any RFP process.
- All contracts are regulated by the 2 CFR ensuring that obligations and funds are not used for: food and beverage, branding and marketing projects, including website development, indirect administrative costs, politically related activities, entertainment, fines and penalties, donations, fundraising activities, individual memberships, and subscriptions.

- For incumbent workers training, the employers must sign certifications and warranties and complete the contract process. Funds will be reimbursed as expenses are incurred. So the State Board, through the Fiscal Agent, will ensure that companies submit performance reports and expense receipts before issuing reimbursements. The performance reports will include the amount of work savings, the estimated amount of annual wage savings, and the specific project measures and results. Employers benefiting from the fund must retain receipts for at least three years beyond the end of the grant period.
- The WDP will agree with employers receiving the fund that they may be subject to local, state, or federal monitoring.
- The DEDC also adheres to state laws regarding the use of public funds. And all contracts are subject to review by the Puerto Rico Comptroller's Office.

In order to prevent risk for companies and employees, state strategies for layoff aversion are oriented in four dimensions:

Partnership with economic development entities: The Department of Economic Development and Commerce is the umbrella for government economic development agencies. Therefore, part of the strategies for the prevention of layoffs is the orientation on incentives in Puerto Rico that promote job creation. Some of these examples are Law 120-2014, Law 135-2014, Incentive for Micro-entrepreneurs, among others. Therefore, part of our strategy is that companies can have savings in their payrolls through state incentives under the DEDC. Even though these are state resources, they apply to WIOA participants.

Incumbent Workers training: Employee training reduces the risk of dislocation of the incumbent workers. Lifelong education is the basis for companies to be competitive in a global and changing economy.

Research and Development: Permissible activities under Rapid Response allow local areas to contract consulting services and labor market research. These actions will encourage data-based decision making and expert research.

Improving technology transfer: The DEDC is developing a case management program that will allow for a better monitoring picture of WIOA participants (employees and employers). This system will be able to keep a better record of the activities that occur in companies.

The DEDC contracted an external resource to develop policies and procedures for establishing a Business Service Unit within the State Unit for Dislocated Workers and Employers. The State Board has a draft policy under consideration: "PRDDEC-WIOA-RR-04-20". This policy details the procedures for the implementation of Rapid Response activities in Puerto Rico

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

The State Board has a draft policy under consideration: "PRDDEC-WIOA-RR-04-20". This policy details the procedures for the implementation of Rapid Response activities in Puerto Rico. The statewide RR coordinator and team respond to natural disasters in the same manner as other dislocations, while adapting to the unique characteristics of the event. The coordinator will organize and develop a coordinated response with the appropriate federal, state, and local agencies to ensure impacted individuals receive the services they need.

When the Governor declares an emergency and formally requests a federal emergency declaration, the Puerto Rico Department of Economic Development and Commerce (DEDC) will work with the local board(s) to determine if the disaster could result in a potentially large loss of employment and evaluate whether sufficient resources are available to adequately provide workforce services. If a funding shortfall is anticipated, the DEDC will seek Emergency Dislocated Worker Grant funding pending federal designation. If FEMA declares a natural disaster and establishes a designated disaster area, the DEDC will formally apply for assistance and work with the local area(s) on implementation.

PR recently has been affected by different types of disasters; hurricanes, earthquakes and the latest COVID-19 pandemic. For this reason, the DEDC requested a waiver allowance of WIOA section 134(a)(2)(A), (2)(B) and (3) to add flexibility in the use of the funds reserved by the Governor for use to provide statewide rapid response activities (i.e. WIOA section 134(a)(2)(A)), for use to provide statewide employment and training activities (i.e. WIOA section 134(a)(2)(B) and (3)) to

provide disaster relief to affected areas. This waiver is submitted in this plan modification for ETA evaluation for PY 2022 and 2023.

Under this waiver allowance, permitted WIOA statewide fund use includes, but is not limited to:

- Expeditious allocation of funds to a local workforce development board, or local board, so they may respond quickly to a disaster, emergency, or other qualifying event as described at 20 CFR 687.l00(b). Only those events, and cascading events caused by a qualifying event, that have been declared as an emergency or disaster by the Federal Emergency Management Agency (FEMA), by the chief official of a Federal Agency with jurisdiction over the Federal response to a disaster with potential significant loss of employment, or the Governor of Puerto Rico as a qualifying event, qualify for the use of WIOA statewide funds.

- The conduct of comprehensive disaster relief employment and training activities, and the provision of necessary humanitarian resources and services, including such other services or resources as deemed necessary as described in 20 CFR 687.180(b)(1).

- An individual's disaster relief employment is limited to 12 months or 2080 hours for work related to recovery from a single emergency or disaster. The Workforce Development Program (WDP) of the DEDC may extend an individual's disaster relief employment for up to an additional 12 months or 2080 hours if requested and sufficiently justified by the local board.

- Employment and training activities as described in WIOA section 134(c) and (d) are supported for WIOA eligible participants.

- Provide support services that enable the participation of individuals in disaster relief employment, including costs such as transportation, childcare, and personal safety equipment and clothing in accordance with local policies.

- Individuals shall be eligible to be offered disaster relief employment and employment and training services if such individual is a dislocated worker; is a long-term unemployed individual as defined by the State; is temporarily or permanently laid off as a consequence of the emergency or disaster; or in the case of an individual who is self-employed, becomes

unemployed or significantly underemployed as a result of the emergency or disaster as well as appropriate adults and youth ages 18 and over.

The waiver request is under consideration of the USDOLETA.

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

The DEDC is in the process of developing a comprehensive procedure, to serve customers using the Workforce Innovation and Opportunity Act (WIOA) Rapid Response (RR), the WIOA Dislocated Worker, and Trade Adjustment Assistance (TAA) programs. Both TAA and Rapid Response activities are shared by State Unit for Dislocated Workers and Employers within the Workforce Development Program of DDEC to ensure the provision of an all-inclusive approach. The Rapid Response section is comprised of Rapid Response (RR) and TAA State Coordinators who are assigned to serve layoffs/closings across the state.

The RR Coordinators begins the process by interacting with companies that have, or plan to, lay off workers. As soon as company closure or layoff information is known, this information is investigated by the assigned Coordinator. Investigation and fact-finding of potential trade impact is immediately conducted for consideration of a TAA Petition. If found that a TAA petition filing is warranted, the TAA State Coordinator discusses with the employer, and if applicable, the Union Officials, the next steps for petition filing as well as potential benefits if approved. If the impacted employer or Union prefers to file the TAA Petition with the U.S. Department of Labor (USDOL), the TAA State Coordinator is available for assistance.

Dependent upon the employer preference, a Rapid Response and/or Worker Orientation meeting is arranged to discuss the re-employment, state, federal, and local resources, as well information

presented by the W-P and UI staff. If TAA certified, the TAA Worker Benefit Orientation (WBO) meetings are arranged in coordination with all applicable partners, including LWDBs.

The TAA WBO meetings expand upon the Rapid Response worker orientation and provide detailed information on all TAA benefits and services. The integration of the State's Rapid Response and TAA Program ensures workers will receive prompt and accurate information to make informed career and employment decisions.

The LWDBs are highly encouraged to co-enroll TAA participants into the WIOA Dislocated Worker programs as applicable. The TAA Comprehensive Manual states "In accordance with federal regulations, each LWDV shall provide a full range of reemployment services, including mandated services, to eligible workers. These services include case management, training, job search/relocation allowances and other dislocated worker programs administered by the LWDB to maximize program efficiency and prevent duplication of services".

Qualified participants for this program can receive the following services:

- Skills assessments, individual employment plans, career counseling, supportive services, and information on training labor markets;
- Classroom training, on the-job training, customized training designed to meet the needs of a specific employer or group of employers, apprenticeship programs, and more;
- Income support available in the form of weekly cash payments to workers who are enrolled in a full-time training course and have exhausted their unemployment insurance;
- Reimbursement for costs of seeking employment outside of the worker's commuting area;
- Reimbursement for relocation costs for employment outside of the worker's commuting area; and
- A wage subsidy for up to two years that is available to re-employed older workers and covers a portion of the difference between a worker's new wage and their old wage (up to specified maximum amount).

b. Adult and Dislocated Workers Program Requirements

1. Work-Based Training Models

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

Draft policy Work-base Training

WDP presented to state board a draft of a policy to provide guidelines regarding the Work-based Training, including On the Job Training, Customized Training, Incumbent Workers Training, and Registered Apprenticeship, which is pending for board review and approval.

Work-based training is employer-driven with the goal of unsubsidized employment after participation. In general terms, work-based training involves a commitment by an employer or employers to fully employ successful participants after they have completed the program. Work-based training can be an effective training strategy that can provide additional opportunities for participants and employers in both finding high-quality work and in developing a high-quality workforce. Customized training, On-the-Job Training (OJT), incumbent worker training, and Registered Apprenticeships are all identified as work-based training services. Each of these work-based training models can be effectively used to target different job seeker and employer needs. In addition, these models can be combined or modified to address trends or new opportunities in the labor market.

The WIOA State Workforce Development Board is in the process of approving a Work-based Training Policy at state level. Development banks with reduced mobility are required to have a local policy that includes a strategy for the provision of on-the-job training services. Local training policies and contracts are reviewed during WIOA programmatic reviews.

Customized Training: Customized training is designed to provide local areas with the flexibility to ensure that training meets the unique needs of job seekers and employers or groups of employers. Customized training is to be used to meet the special requirements of an employer or

group of employers and conducted with a commitment by the employer to employ all individuals upon successful completion of training.

Employers pay a significant portion of the training costs, as determined by the local board, taking into account the size of the employer and other factors that may include the number of employees participating in training; the wage and benefit levels of the employees (at present and anticipated upon completion of the training); the relation of the training to the competitiveness of the participant; and other employer-provided training and advancement opportunities.

The training must incorporate new technologies, processes, or procedures, skills upgrades, workplace literacy, or other appropriate purposes as identified by the local board.

The LWDBSs are required to have a local customized training policy for the execution of customized training contracts. Since "significant portion of the training costs" is not identified under the WIOA, the LWDBs will be allowed to locally define "significant portion" as part of their local customized training policy.

On-the-Job Training: The OJT is a fundamental tool that is primarily designed to hire the participant first and provide the knowledge and skills necessary for the full performance of the job. The term "on-the-job training" means training by an employer to a paid participant while performing productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the job.
- Provides reimbursement to the employer of up to a percentage of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training.
- Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

The LWDBs are required to have a local OJT policy for the execution of OJT contracts. Local OJT policies and contracts will continue to be reviewed during the WIOA Programmatic Reviews.

Before approving an OJT, the local area must screen the potential participant to ensure the training service. The assessment, at a minimum, shall include the specific skill requirements of the applicable occupation, the participant's academic and occupational skill level, previous work experience, and the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The IEP should reference the lack of skills and the need for OJT.

Prior to entering into an OJT agreement with an employer, the local LWDBs shall conduct a pre-screening to ensure that the employer meets the minimum standards and can provide both training and long-term employment to an OJT participant.

Local areas should target priority industries identified by Local Workforce Development Boards consistent with a demand-driven workforce system. Occupations targeted for OJT should be defined in the local OJT policy and should align and support State Workforce Development Board. Targeted outreach should then occur within those industries.

Incumbent Worker Training (IWT) Programs: The IWT is designed to ensure that employees of a company are able to acquire the skills necessary to retain employment and advance within the company. In addition to provide the skills necessary to avert a layoff and must increase both the participant's and a company's competitiveness. An ideal IWT is one where a participant acquires new skills allowing the participant to move into a higher skilled and higher paid job within the company, thus allowing the company to hire a job seeker to backfill the incumbent worker's position. The training should, whenever possible, allow the participant to gain industry-recognized training experience and ultimately, should lead to an increase in wages.

The IWT is designed to meet the special requirements of an employer (including a group of employers in partnership with other entities) to retain a skilled workforce, or to avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment. The IWT is conducted with a commitment by the employer to retain or avert the layoffs of the incumbent workers being trained.

Local areas may use up to 20 percent of their local Adult and Dislocated Worker funds for IWT. The employer, or group of employers, must pay for a portion of the cost of providing the training to

incumbent workers. The portion of the training cost is the non-federal share of the cost of providing the training.

The LWDBs utilizing IWT are required to have a local IWT policy in place. The local policy must include a description of local and/or regional layoff aversion strategy being utilized.

Employers are required to contribute their share (the non-federal share) of the training costs, using a sliding scale approved by the LWDB.

Local policies and contracts for IWT will be reviewed during the WIOA Programmatic Reviews.

2. Registered Apprenticeship

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

Registered Apprenticeship is a potential workforce solution that contributes to the development of industry-defined competencies and also serves as a proven industry-driven workforce.

Since 2018, the Department of Economic Development and Commerce of Puerto Rico thru Workforce Development Program is working as an Apprenticeship Office under USDOL-OA Region I oversight. In this capacity, the department has direct contact with Registered Apprenticeship Sponsors/Employers and promotes the utilization of WIOA funding to employers in training WIOA qualified apprentice participants. There is a stipulation that the employer will retain the apprentice upon completion of the first year of the apprenticeship program. Incentives exist for employers which include direct financial assistance for the apprentices' related training instruction.

For eligible participants, local Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker funds may be used for not only Registered Apprenticeships, but for pre-apprenticeship training, such as remediation and/or basic job skills training, to prepare an individual for a Registered Apprenticeship program.

Registered apprenticeships can be funded through various mechanisms. There are several ways in which training services will be used in conjunction with these programs, which are as follows:

- Registered Apprenticeships generally involve both classroom and on-the-job instruction. An On-the-Job Training (OJT) contract may be developed with a Registered Apprenticeship program for training participants. The OJT contracts are made with the employer. The OJT contract may be made to support some or all of the OJT portion of the Registered Apprenticeship program,
- A combination of an Individual Training Account (ITA) to cover classroom instruction along with an OJT contract to cover some or all of the work-based training portion of the Registered Apprenticeship is allowed, and
- Incumbent worker training may be used for upskilling apprentices who already have an established working/training relationship with the Registered Apprenticeship program.

Local areas may also include support services, in coordination with career and/or training services to participants in a Registered Apprenticeship program. The supportive services must be consistent with the WIOA Section 134(d)(2) and state and local policies.

An Apprenticeship State Expansion Grant was awarded to DEDC to promote the expansion of apprenticeship programs across occupations and industries sectors and encourage diversity in the apprentice population. The performance period ends on June 30, 2022.

3. Training Provider Eligibility Procedure

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

The Procedure for Initial and Continuous Eligibility for Training Providers contains the State policy applicable to WIOA training providers. The policies guide the procedures, directives and the threshold criteria for achieving a determination of eligibility of educational institutions interested in providing training and learning services for adults and dislocated workers, in compliance with section 122 of WIOA. The procedure applies to trainings and learning programs provided through the use of the Individual Training Accounts ("ITAs").

The following institutions may request an eligibility determination, initial or continuing, to provide training services under WIOA:

- Higher education institutions that offer a program that leads to a post-secondary recognized credential;
- Institutions that offer training programs registered under the National Apprenticeship Act;
- Any other public or private institution with training programs, which may include joint labor-management apprenticeship organization and occupational technical training; and
- Eligible adult education and literacy service provider under Title II, if these activities are provided in combination with training in occupational skills.

Any educational institution must complete the application for eligibility and submit the required information electronically to be assessed by the Local Board, in accordance with section 122 of WIOA.

The Local Board submits to the state and to the State Board the training service providers that comply with the minimum requirement established by the Board. Thereafter, the State will include the recommended eligible programs in the State list of training services providers and disseminate them in all the One Stop Centers via the electronic system. The electronic system will automatically update the list any time a training or education program will be determined eligible. The State shall notify the Local Board through written communication the update of the training service providers' list.

Extended Eligibility – Biennial Review: All training providers' eligibility is going to be reviewed at least every two years as indicated in the State Training Provider Policy. The State will review the performance of providers to ensure they are meeting minimum levels of performance. In addition, this review will also include verification of the registration status of registered apprenticeship programs.

All sponsor of the Registered Apprenticeship program in the USDOL will automatically include the apprenticeship programs in the State list, which will be disseminated to the One Stop Centers. The

electronic system will automatically update the list each time a Registered Apprenticeship Program is included. The sponsors of Registered Apprenticeship programs shall not be subject to the same requirements of implementation for the determination of eligibility of other training providers.

RA sponsors on the ETPL:

All Registered Apprenticeship (RA) programs are work-based, employer-driven, and consist of two primary components: on-the-job training (or on-the-job learning) and related instruction (e.g., classroom training). How those components are structured varies based on industry needs. The state ETP list addresses one of the two components of RA programs – the related technical instruction – generally referred to as "RTI."

Under WIOA, all apprenticeship programs that are registered with the USDOL Office of Apprenticeship (OA) could be automatically eligible to be included on the State Eligible Training Provider List, as a wish of the sponsor RIT providers.

All RA programs will be informed of their automatic eligibility to be included on the list and will be provided an opportunity to consent to their inclusion, before being placed on the State ETPL.

There are no WIOA performance requirements for RA programs and are not required to provide ongoing reports to the state or local boards.

Puerto Rico provides to the sponsors that, as part of the RI, in case of need a registration form with instructions, for contract external training services. If they wish to belong to the ETPLs in accordance with 20 CFR 680.470 A, the RI provider should complete the form to be in. All external RI providers are oriented on their right to decide to be a part of the ETPL.

It is important to highlight that in Puerto Rico, there is a tendency to offer the RI activity with internal resources. This is because many industries maintain training programs designed by their Subject Matter Experts (SME). SMEs, on certain topics, are also hired externally. These external SMEs do not meet the requirements to be registered on the ETPL. As a general rule, these external SMEs are private individuals, consultants, and advisers in specific areas. RI outlines containing courses offered by external SMEs are limited because the RI outline is offered by a range of internal

and external professionals who are experts in specific knowledge and skills that are part of the RI outline.

Local Workforce Development Areas (LWDA) may not impose additional criteria, information, or reporting requirements on RA programs. Additionally, if an LWDA has a local ETPL, RA programs should be included and should be noted as 'in-demand occupations". If an issue arises, LWDAs should contact the Workforce Development Program (WDP) for assistance.

RA programs must remain registered and in good standing with the OA to remain on the ETPL. Registered Apprenticeship program sponsors that have requested to be ETPs will remain on the ETPL as long as the program is registered or until the program sponsor notifies the WDP that it no longer wants to be included on the ETPL or until the RA program is determined to have intentionally supplied inaccurate information or to have substantially violated any provision of Title I of WIOA (e.g., civil rights of discrimination violations) or the WIOA regulations, including 29 CFR part 38. An RA program whose eligibility is terminated due to intentionally supplying inaccurate information or substantially violating WIOA provisions will be terminated for not less than two years and is liable to repay all youth, adult, and dislocated worker training funds if received during the period of noncompliance.

If instances of substantial violations are reported to the WDP, they will work in consent with the OA to make the determination of ineligibility. The opportunity for an appeal and hearing is described in the ETPL Appeal Procedures.

The biennial review will include verification of the registration status of RA programs and the removal of any RA programs that are not currently registered or do not wish to continue as ETPs. Although RA programs are not required to provide ETP Performance reports, voluntary reporting of performance information is encouraged under WIOA regulations, and outcomes for WIOA participants in WIOA funded RA programs must be included in the State's annual performance report. WIOA 116 (d) (2).

In order for Registered Apprenticeship programs to be included on the ETPL, completion of an abbreviated form is necessary to collect information needed for populating the ETPL. If the program is viable and active, the program will remain on the ETPL as long as the program is

registered or until the program sponsor notifies the State that it no longer wants to be included on the list. Training programs must be approved by the Office of Apprenticeship.

Registered Apprenticeship can take many forms, and the sponsors are diverse, including:

- Employers who provide related instruction. A number of employers with Registered Apprenticeship programs provide formal in-house instruction as well as on-the-job training at the worksite.

- Employers who use an outside educational provider. Under this model, Registered Apprenticeship program sponsors do not provide the related instruction or educational portion of the apprenticeship but rely upon an outside educational two entities to deliver instruction. Employers can use two- or four-year post-secondary institutions, technical colleges, eligible providers of adult education and literacy activities under title II, or on-line courses for related instruction. The employer is the ETP and must identify their instructional provider as defined locally.

- Joint Apprenticeship Training Programs. These programs are made up of employers and unions. They have an apprenticeship training school where the instructional portion of the Registered Apprenticeship program is delivered. The training schools are usually administered by the union.

- Intermediaries. Intermediaries can serve as program sponsors when they take responsibility for the administration of the apprenticeship program. They can also provide expertise such as curriculum development, classroom instruction, and supportive services, as appropriate. The intermediary is the ETP and must identify the instructional provider if an outside organization is providing the educational portion of the apprenticeship. Intermediaries include:

- Educational institutions including two and four-year post-secondary institutions, technical colleges, or eligible providers of adult education and literacy activities under title II. In this model, the educational institution administers the program, works with employers to hire

apprentices, and provides classroom or on-line instruction for the apprenticeship program.

- It should be noted that as part of our assessment and outreach to disseminate the apprenticeship program, registered educational institutions, understanding community colleges, universities, and similar, are being oriented to offer their programs to the employers who will be part of that registry. These institutions are nationally registered and can provide federal financial aid to the students who qualify. Individuals who enter Apprenticeship Programs belonging to these institutions will have the RI and the opportunity to be placed with employers allied to the program for the OJL;

- Industry associations administer the program and work with employer/members and educational entities to implement the apprenticeship program; and,

- Community-based organizations administer the program and work with employers, educational entities, and the community to implement the apprenticeship program.

Eligible Training Providers Module

This module of PRIS, electronically integrates the entire process for eligible training service providers to: submit documentation to the Local Boards of trainings eligible for WIOA funds; allow the Local Board process for evaluate and approve recommended training in accordance with occupational demand; as well as the evaluation at state level and the creation of the ETPL. The module has the function of collecting the ETPL performance data element required in the ETA 9171.

Compliance: The Plan does not provide the information a sponsor does need to provide per TEGL 8-19, Attachment IV. There is very confusing information regarding the RA provider and the steps they need to take to be on the list and who cannot be on the list as a RA provider. RA programs must be given the opportunity to opt-in to the ETP list rather than be added automatically. The policy does not define any of the required eligibility criteria. The policy does not describe the process for removing a provider from the ETP list nor the appeals procedure for a provider that is

facing removal. The policy does not define what the state considers a "substantial violation of the requirement to timely and accurately submit all required information…."

The current policy *"Reglamento para la determinación de elegibilidad inicial y continua para proveedores de servicios de adiestramiento"* is under review. The revision will be by TEGL 8-19 Change I and will detail the documents required for Registered Apprenticeship Sponsors interested in joining the ETPL. The policy under development will allow Registered Apprenticeship to opt into the ETPL rather than being automatically included. Article IV *Aplicabilidad y Objetivos* includes detailed eligibility criteria. However, they will be updated according to TEGL 8-19. The revised policy will define substantial violations.

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

The State Board recognizes that it has to develop a uniform public policy that establishes the priority of services for individuals most in need, as required for the youth, adults and displaced workers programs. The publication of TEGL 7-20, which extends the priority for adult services that meet the criteria of most in need, makes the development of this public policy pertinent.

Planning guideline is the state board's primary source for setting public policy for the use of funds and service delivery in AJCs. Through this guide, local areas must establish the criteria and the process by which priority of service will be applied. Priority for individualized career and training services must be given to recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient. It is not necessary to determine that an adult is eligible in accordance with the priority of service until it is determined that the individual needs individualized career or training services. Veterans and eligible spouses continue to receive priority of service.

Local areas must establish the criteria and the process by which priority of service will be applied. Priority for individualized career and training services must be given to recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient. It is not

necessary to determine that an adult is eligible in accordance with the priority of service until it is determined that the individual is in need of individualized career or training services. Veterans and eligible spouses continue to receive priority of service.

When programs are statutorily required to provide priority for a particular group of individuals, priority must be provided in the following order:

- First, to veterans and eligible spouses who are also funded in the groups given statutory priority for the Workforce Innovation and Opportunity Act (WIOA) Adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services funded with the WIOA Adult formula funds for individualized career services and training services.
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the WIOA's priority groups.
- Third, to veterans and eligible spouses who are not included in the WIOA's priority groups.
- Fourth, to priority populations established by the Governor and/or the local Workforce Development Board.
- Last, to non-covered persons outside the groups given priority under the WIOA.

TEGL 7-20-Priority of Service Provisions Adult Program

Planning guidelines is the state board's primary source for setting public policy for the use of funds and service delivery in AJCs. This guide is updated annually to temper with public policies issued by ETA, the state board, and state policies issued by the governor. The state board must develop, as soon as in PY 2022, a uniform public policy to establish the priority of services required in youth, adult, and dislocated worker programs. Once the state board complete this policy, then local boards must review and update their policies and procedures, including the monitoring of the implementation of these policies and procedures in AJCs, according with the state policy.

However, the WDP will include in advance, instructions in the guide for the fulfillment of this priority established in the TEGL 7-20, Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program. TEGL summary will include the following items:

- WIOA requires states to develop criteria, policies, and procedures for applying this priority, including monitoring local areas' compliance with this priority provision as stated in 20 CFR 680.600 and TEGL 19-16. These priorities are in addition to the requirements in the WIOA regulations at 20 CFR 680.650 those veterans and their eligible spouses receive priority of service for all Department of Labor (DOL)- funded job training programs, including the WIOA Adult program.

- TEGL 7-20 convey ETA vision to priority of service provisions in the WIOA Adult program, to enhance workforce development services to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient. When using WIOA Adult program funds to provide individualized career services and training services, must give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners). AJC staff must always prioritize services to these populations, regardless of the amount of funds available to provide services in the local area.

- ETA envisions that giving priority of service to these individuals means ensuring that at least 75 percent of a state's participants receiving individualized career and training services in the adult program are from at least one of the priority groups mentioned above, and expects this rate will be no lower than 50.1 percent in any state.

- States and local WDBs to take the following actions, as appropriate, to improve efforts to serve individuals from these priority groups.

Establish Policies and Procedures for Provision of WIOA Adult Priority of Service

Priority must be provided in the following order:

1. First, to veterans and eligible spouses who are included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
2. Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
3. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
4. Fourth, priority populations established by the Governor and/or Local WDB.
5. Last, to non-covered persons outside the groups given priority under WIOA.

State board and local board will establish outcomes to measure the implementation of the policy, like the percentage of individuals in individualized career or training services from at least one priority group, or the percentage of individuals from at least one priority group receiving individualized career or training services.

Integrate Service Delivery to Support Priority Populations

1. Coordination with CGU partner programs is expected to maximize resources and align services for these priority populations.
2. AJC partners can work together as follows:
    a. Develop cross-training among CGU partner programs to broaden understanding between programs and share expertise on the needs of specific populations, including those most in need.
    b. Staff the center with career counselors skilled in advising job seekers of their options, who are knowledgeable about local labor market dynamics, aware of available services inside and outside the AJC, and skilled in developing customers' skills for employment success.

c. Develop and implement operational policies aimed at establishing an integrated case management system, using technology to achieve alignment in the provision of services that meets the needs of clients.

d. Create partnerships through programs, including community-based and philanthropic organizations, to maximize services, including support services.

e. Develop strategies for dissemination and search for candidates integrated with the partner programs of the CGU, to identify and provide services to those most in need. Candidate search strategies should include the alternative of identifying those most in need through referral to federal, state, local, community, and philanthropic organizations, including those that provide support services.

f. Encourage, develop, and implement the use of career pathways for those most in need. For more information and technical assistance on career pathways, please visit the following resources: o Career Pathways Community (WorkforceGPS) - https://careerpathways.workforcegps.org/ o Career Pathways Toolkit - https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolki

g. TEGL 7-20 presents examples of how CGU partner programs such as WIOA youth programs*, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Adult Education and Family Literacy Act (AEFLA), Vocational Rehabilitation (VR), Community Service Block Grant, HUD's Continuum of Care (CoC) Program*, among others, can be integrated to offer integrated services to this population of most in need.

h. Report accurate service data

    i. The state and local level, through the elements of the PIRL, has to report the provision of services to the population most in need. Section 116 of WIOA requires States to accurately report data on the characteristics of participants, services received and results obtained. DOLETA will analyze the

data sent by the State to identify compliance with the rate of 50.1% of its total adult participants, who receive individualized career services and / or training are part of one or more of the priority groups. ETA will provide technical assistance to states, as needed.

i. Collaborate with ETA in the implementation at the state level

ETA will be evaluating the implementation of the priority for adults, through the following activities:

Review states' Priority of Service policy implementation and monitoring;

1. Identify and share promising practices and facilitate peer-to-peer assistance among states and local areas;
2. Monitor the numbers of individuals from priority groups that are enrolled in individualized career services and training services, as well as the policies and practices that support these services;
3. Monitor state and local area implementation of priority of service;
4. Work with states to identify and solve data reporting issues, including data validation and data integrity efforts like the Quarterly Report Analysis (QRA) process ETA is currently piloting.

Technical Assistance Resources

1. ETA has technical assistance tools, resources and events that highlight best practices and lessons learned in the implementation of this policy. These resources are available through the following links:
    a. WorkforceGPS.org
    b. Innovation and Opportunity Network (ION) or Performance Reporting
        i. "Adult and Dislocated Worker Key Resources - Special Populations" page (https://ion.workforcegps.org/resources/2017/03/09/11/25/Special_Populations_-_Adult_and_Dislocated_Worker_Populations) or

ii. "Performance Reporting for WIOA Adult Priority Populations" Desk Reference (https://performancereporting.workforcegps.org/resources/2019/11/08/19/53/Perform ance-Reporting-for-WIOA-Adult-Priority-Populations-Desk-Reference).

iii. Department of Labor's Clearinghouse for Labor Evaluation and Research at https://clear.dol.gov/topic-area/low-income-adults;

iv. HHS Pathways to Work Evidence Clearinghouse https://pathwaystowork.acf.hhs.gov/.

Monitoring

The statutory requirement applies to Adult program funds for individualized career and training services. Funds allocated for the Dislocated Worker program are not subject to this requirement. The State Board will be reviewing and approving a policy to provide the framework for the local boards. Priority of Service is monitored as part of the state's WIOA programmatic reviews. The goal of programmatic reviews is to provide technical assistance, as appropriate, and ensure that established policies, procedures, and systems achieves quality program outcomes that meet the requirements and objectives of the WIOA and federal and state regulations.

The Workforce Innovation and Opportunity Act (WIOA) requires priority to be given to public assistance recipients, other low-income individuals, and individuals who are basic skills deficient, when providing individualized career services and training services using WIOA Title I Adult program funds. WIOA provides a focus on serving individuals with barriers to employment, and this priority in the law intends to ensure access to these populations on a priority basis across all titles. In the initial evaluation process for WIOA participants, they are asked to report whether they are receiving public assistance, whether the participant has a low-income level, and whether they have deficient basic skills level through assessment tests conducted by AJC staff. The follow-up process for these participants is conducted to ensure that the service priority is met. The DEDC is in the process of doing the monitoring instrument to ensure compliance with the priority of service policy for eligible participants. The tool will provide a review of overall eligibility as well as the

priority of service based on the requirements of the state policy. Also, the monitoring instrument will verify that all local areas have established written policies and procedures to ensure that priority of service to participants is met. Currently, AJC staff in Puerto Rico keep the eligibility document for priority services in the participant's file.

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

The Planning Guidelines is also the official document that sets the public policy and requirements for local area funds allocation regarding the Youth, Adult and Dislocated Workers programs. Section VIII of the guidelines establishes the public policy for transfer of funds between the adult and dislocated worker programs in accordance with section 133(b)(4) of WIOA allows for the transfer of 100 percent of funds between adults and dislocated workers programs, subject to the approval of the Governor. The local areas transfer requests are evaluated according to the need of each local area. To request transfers between programs, local areas must present to the State a transfer application that include:

- Transfer application signed by the president of the Board of Mayors and the president of the Local Board
- Certification of the Local Board in quorum, with the presentation of the minutes of the meeting in which are discussed the scope of the transfer of funds, together with the vote held to authorize it
- Statistical data of the closures of business, industries or employers, as well as the dislocated workers or adults with need, which justify and evidence the need for increase services in the program which funds will be transferred (applications received without this information will not be considered for evaluation)
- Measures to be implemented to avoid any adverse impacts on the services of the program from which funds were transferred or reduced

- Two Budget Information Summaries (BIS), one including the transferred amount to maintain the identity of the program where it is transferred, and another reflecting the reduction of the program from which the transfer takes place

Transfer of funds will be made only after completing a thorough analysis of the impacts on the service in the affected programs. The Local Board in charge of establishing the priorities and outcomes of the local areas will consider the impact in the service delivery at the One Stop Centers prior to completing a transfer of funds.

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

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

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

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

As provided in sec. 123 of WIOA, local boards must identify eligible providers of youth workforce development activities in the local area by awarding grants or contracts on a competitive basis based on the recommendation of the youth standing committee, whose establishment will be encouraged by the State Board.

The Local Boards must include the State plan criteria used to identify youth providers, taking into consideration the ability of the provider to meet performance accountability measures based on the primary indicators of performance for the youth programs. Also, must conduct a full and open competition to secure that the selection of youth service providers is made in accordance with federal procurement guidelines in 2 CFR parts 200, in addition to applicable State and local procurement laws.

- WIOA-03-20- Policy for the Competitive Selection of Eligible Youth Service Providers

- DDEC-WIOA-02-20 - Technical Assistance Guidelines to 14 elements of youth program - Guide to define concepts, eligibility, and other aspects related to the youth program

Where the Local Board determines there is an insufficient number of eligible providers of youth workforce development activities in the local area, such as might be the case in a rural area, the Local Board might opt to award grants or contracts on a sole source basis (WIOA sec. 123(b)).

Local youth programs must be designed to provide for an objective assessment of each youth participant that meets the requirements of WIOA Section 129(c)(1)(A) and include a review of the academic and occupational skill levels, as well as the service needs, of each youth for the purpose of identifying appropriate services and career pathways for participants and informing the individual service strategy. Also, to develop and update, as needed, an individual service strategy for each youth participant and provide case management to youth participants, including follow-up services. Local areas must ensure that WIOA youth service providers meet the referral requirements established in sec. 129(c)(3)(A) of WIOA for all youth participants.

According to sec. 129(c)(2) of WIOA, local areas must make each of the required 14 youth elements available to youth participants. According to WIOA sec. 129(c)(3)(C), the local areas must ensure that parents, youth participants, and other members of the community with experience relating to youth programs are actively involved in both the design and implementation of its youth programs. A minimum of 75% of State and local youth funding is to be used by local areas for out-of-school youth (OSY). At least 20% of local Youth formula funds must be used for work experiences, such as summer and year-round employment, pre-apprenticeship, OJT, internships, or job shadowing.

Youth program providers must provide a detailed description of each program element with youth performance information (for WIOA youth providers). Performance information for each training program will include a detailed description of the provider partnerships with business partners, and a provider must not be found in fault in criminal, civil, or administrative proceeding related to its performance as a training or educational institution and must not be included in any Federal, State, or local debarment and suspension lists.

For the fulfillment of these principles, the procurement process and the provision of 14 elements of the youth program, the state board issued the following public policies:

- DDEC-WIOA-08-20 - Case Management and Record-Keeping Policy
- DDEC-WIOA-07-20- Procedure for the follow-up service required by WIOA for participants of the Adult, Dislocated Worker, and Youth Programs
- WIOA-03-20- Policy for the Competitive Selection of Eligible Youth Service Providers
- DDEC-WIOA-02-20- Technical Assistance Guidelines to 14 elements of youth program - Guide to define concepts, eligibility, and other aspects related to the youth program.

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

Out of school youth are one of the most difficult populations to serve because their primary interest lies in attaining self-sufficiency. Local Areas received youth with facing diverse economic and social barriers to achieve their academic or employment goals. Among these: below average academic and reading levels; risks of becoming dropouts, homeless, runaway, foster child, pregnant or parents, offenders; or in need of additional assistance to obtain and maintain employment. To improve the out of school youth outcomes the State will pursue the following strategies:

- Implementation of the Registered Apprenticeship. Registered Apprenticeship will be implemented as a useful strategy to increase youth attainment of industry-recognized credentials, as well as to improve youth outcomes.
- Puerto Rico Office of Apprenticeship will partner with the PRDE, community colleges, universities and community partners to increase the opportunities for youth to transition from high schools into an apprenticeship or pre-apprenticeship program.

- Foster a structured approach for out of school youth emphasizing the importance of a youth program design that includes meaningful work experiences that integrate work-based learning and academic classroom learning, as a strategy to strengthen services to out of school youth. Local areas will be encouraged to design this activity by providing a greater number of hours in work experience combined with alternative secondary school, support service and academic learning for the out of school youth.

- Strengthening Employer Collaboration. Increase partnerships with employers to foster economic development and high-growth opportunities for out of school youth. The WIOA system has the mission to prepare and train workers, and to help businesses find qualified workers to meet their present and future workforce needs. Local areas will be encouraged to integrate employers to help define and support new strategies designed to better educate, train, and prepare out of school youth and to provide critical leadership in the creation of these pipeline strategies.

- Also, employers can help the workforce system by identifying the skills and competencies needed in the industry, particularly for entry-level positions; developing industry certification; collaborating with training institutions in occupational-skills curriculum development; creating student internships and work experience opportunities; providing formal mentoring programs and partnerships that support youth in their interest to pursue careers in high-growth and high-demand industries; and acquiring employer and industry commitments to hire youth. Also, under WIOA, employers are the main partner in the implementation of Apprenticeship training opportunities and credentials.

When designing youth employment and training programming, State and local areas should consider the following design elements; promotion and increase of meaningful work experience opportunities as set forth in section 129(c)(2)(c) of WIOA, particularly for out of school youth; increase of service delivery for youth with disabilities; need to address the issues impacting service delivery for out of school youth; need to ensure quality case management through the monitoring process; and provision of effective follow-up services.

The state level will provide technical assistance to local areas for carrying out the necessary activities to improve the outcomes for out of school youth as described in section 129(a)(1)(B).

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

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

The state board approved the public policies WIOA-03-20 and WIOA-02-20, which establish the parameters to be followed by local areas in the design of the youth program. The first requires the fulfillment of a procurement and open competence process in the selection of eligible providers, and the second helps to define the theoretical framework for the design of the 14 elements, establishing the allowable, not allowable activities, as well as examples of service delivery activities for this clientele. The WDP conducted several technical assistance sections for both policies.

WIOA eligible youth are individuals between the ages of 14 and 24 that are either Out of School Youth or In School Youth as defined by WIOA's section 129(a)(1). These must also meet one of the following additional conditions: being basic skills deficient; be an English language learner; an offender; homeless, runaway, in foster care or aged out of the foster care system; pregnant or parenting; an individual with a disability; or a person who requires additional assistance to enter or complete an educational program or to secure and hold employment.

Services are provided to eligible youth participants through a network of youth service providers, which are competitively procured. The Youth program is committed to providing, through local areas, the following required youth elements:

- Tutoring, study skills training, instruction and evidence-based drop-out prevention and recovery strategies;
- Alternative secondary school services or drop-out recovery services;
- Paid and unpaid work experiences;
- Occupational skills training;

- Education offered concurrently with and in the same context as workforce preparation;
- Leadership development;
- Supportive services;
- Adult mentoring;
- Comprehensive guidance and counseling;
- Financial literacy education;
- Entrepreneurial skills training;
- Labor market and employment information services;
- Activities that prepare for transition to post-secondary education and training; and
- Follow-up services.

In order to become an eligible Youth training provider, the entity must first contact the local area to apply. The area will conduct a competitive bidding process to award locally procured youth contracts. The statewide youth eligible provider list is comprehensive list of those locally procured youth contracts. Once the entity has successfully completed the application process dictated in the local area policy, the application is then referred to the State program to be included on the statewide youth provider list.

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

State policy defers to local policy on the definition of "requires additional assistance to complete and educational program, or to secure and hold employment."

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

Puerto Rico compulsory education laws require children between the ages of 6 and 16 to attend school. However, for purposes of WIOA, the Workforce Development Program does not consider providers of Adult Education under title II of WIOA, YouthBuild programs, and Job Corps programs to be schools. Therefore, WIOA youth programs may consider a youth to be "not attending school" for purposes of WIOA youth program eligibility if he/she is attending Adult Education provided under title II of WIOA, YouthBuild, or Job Corps. It is the policy of the WDP that student attendance at a post-secondary institution qualifies as "attending school."

State policy defines "alternative education" as options for students who are at risk of dropping out of high school to remain engaged in an alternative-learning environment that focuses on their particular skills, abilities, and learning styles.

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

Puerto Rico is using the basic skills deficient definition as contained in WIOA sec. 3(5). The term "basic skills deficient" means a youth that: has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

As included in WIOA Section 3(5)(B):

The term "basic skills deficient" means, concerning an individual-

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

An adult may be assessed as deficient in basic knowledge through observations by the case manager and documented in case notes. For example, the case manager may observe that the adult is not able to read or fill out an application form or have basic computer skills. It is expected that any such basic skills deficiencies will be determined by an objective, valid, and reliable assessment. There are several methods for evaluating basic skills. Each local area must use the test tabulation to classify the participant's performance levels. The participant's file must contain an academic test (including the participant's name, date of test, and results).

d. Single-area State Requirements

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

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

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

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).)

Not applicable.

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

Not applicable.

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

Not applicable.

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.

Not applicable.

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.

Not applicable.

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.

Not applicable.

e. Waiver Requests (optional)

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

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

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

Waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720 (b)

to increase the On-the-Job Training (O)T) employer reimbursement up to 90 percent

1. Statutory and/or regulatory requirements to be waived:

WIOA Section l34(c) (3)(H)(ii)(II), and the accompanying regulations as promulgated at 20 CFR 680.720 (b), state that employers may be reimbursed up to 50 percent of the wage rate of an OJT participant for the extraordinary costs of providing the training and additional supervision related to the OJT.

State Law 62-2014, ***Ley de Apoyo a la Microempresa, al Pequeño y Mediano Comerciante***; defines microbusiness (PYMES by its Spanish acronym) as a business that generates a gross income of less than $500,000 annually, with seven employees or less, and small merchant as someone who generates less than $3 million gross per year and employs 25 people or less. Also defined are the medium-sized business those that generate an annual gross revenue of less than $10 million and employs fifty or fewer employees.

According to the Center for Economic Research of the Economic Development Bank for Puerto Rico (BDE), when compared to 2021, in 2022 there was an increase of 4% of small and medium-sized business (SMEs) in the Puerto Rican economy. On average, each SME in 2022 generated 12 jobs, which added 715,998 workers in the private sector, and of this total, 43.4% correspond to people who work in establishments with fewer than 50 employees, and 56.6% work in private companies with a payroll of 50 employees or more, according to BDE data. (Source: El Vocero de PR; October 22, 2022; Hay más pequeñas y medianas empresas en la Isla; Banco de Desarrollo Económico para Puerto Rico (BDE))

According with BDE, the five industries with the most private business operating with fewer than 50 employees are:

- retail trade, with 8,408 establishments;

- health and social assistance services, with 7,380;
- professional, scientific and technical services, with 5,142;
- accommodation and food services, with 4,671;
- other services with 3,349 businesses.
- and construction came in sixth place, with 2,233 establishments.

The PYMES have a significant impact on the island's economy and on job opening and is the state's public policy to promote the creation and strengthening of these businesses. Puerto Rico is requesting a waiver to the current allowable employer reimbursement rate of up to 50 percent of the wage rate of an On-the-Job-Training (OJT) participant for the extraordinary costs of providing training and additional supervision related to the OJT as described in the WIOA Section 134(c)(3)(H)(ii)(II). The waiver request has been developed following the WIOA guidelines in Section 189(i)(3)(B) and the WIOA Federal regulation at 20 CFR 680.720(6).

Puerto Rico is proposing a sliding scale of reimbursement to the employer based on its size and capability. Under this waiver, the following scale will be implemented:

- up to 90% reimbursement for employers with 50 or less employees.
- up to 75% reimbursement for employers with a workforce between 51 and 250 employees.
- For employers with 251employees or more, the statutorily defined 50% limit will continue to apply.

The waiver is requested to be used with all WIOA formula funds: Adult, Dislocated Worker, Youth, National Dislocated Worker Grants, as well as other Discretionary grants, as appropriate.

The state board developed the public policy WIOA-PP-04-22, Requirements for Workbase Training Activities targeting that in On-the-Job Training activities, priority is given to training aimed at companies committed to the registered apprenticeship program (RAP). The Puerto Rico Apprenticeship Team has been working hard to involve the LWDBs in the expansion of the apprenticeship programs. In PY 22-23, forty-three (43) technical assistance sessions were carried out in ten of the fifteen local boards. As a result, five boards invested WIOA formula funds in seven programs to conduct the On-the-Job Learning. In addition, the AJC staff provide case management and supportive services to eligible apprentices.

The waiver allows Puerto Rico's businesses to rapidly adapt to technological and general marketplace changes by improving their capacity to expand and remain competitive with affordable OJT options uniquely designed to achieve their specific development goals. The reduced match requirement for employers, particularly new start-ups and small to medium-sized

businesses, provide an attractive and cost-effective financial incentive, increasing the opportunity to utilize the OJT model for hiring and training new workers. From an economic development standpoint, increasing the number and quality of the labor force stimulates the competence and competitiveness of Puerto Rico's economy.

2. Actions undertaken to remove state or local barriers:

There is no state or local statutory or regulatory barrier to implement the proposed waiver.

3. Goals and expected programmatic outcomes from the waiver:

This waiver request is consistent with national policy to develop a workforce system that is responsive to the demands of both individual and employer customers. The Commonwealth anticipates the following goals will be achieved with the waiver's approval:

- Maximize the flexibility needed to impact local economic vitality and direct resources where demand for services is greatest by assisting local areas in marketing the OJT as a vehicle to engage employers, particularly in targeted sectors, to hire and provide training to new workers.
- This flexibility will build the capacity and future viability of both the workforce and the industries themselves. Assist with the transformation of the current workforce system to a demand-driven, sector-based and regionally driven talent development pipeline.
- Increase training and transitional employment for unemployed workers and hard-to-serve youth and adults.
- Equip individuals with relevant job training and transferable skills in high-skill, high-wage, high-demand occupation, and industries.
- Increase business usage of the local workforce system by providing added incentives to hire and train new workers.

The data presented is the official data registered in the Participant Record Information System (PRIS).

- Tables 1 above show the official data for the delivery of training services in the period 2020-2022, both at the state level and in 15 local areas. It also includes the number of participants entering employment for the second and retained in the fourth quarter.

TABLE 1- Training Services PY 2020-2022 & Projected 2025

PY	Receive Training	OJT	%	Employment Exit 2Q	%	Retention 4Q	%
2020	5,480	439	8%	300	68%	228	76%
2021	7,130	784	11%	521	66%	346	66%
2022	5,298	522	10%	208	40%	10	5%
	Projected						
2023	5,787	998	17%	251	25%		
2024	5,696	1040	18%	205	20%		
2025	5,025	1146	23%	159	14%		

- In PY 2021, 10% of training offered were OJT, with 66% employed in the second quarter and 66% with retention in the fourth quarter.
- For PY 2022, 522 on-the-job training were offered, with a placement of 39% in employment in the second quarter and a retention rate of 4% in the fourth quarter.
- In PY 2023, the approved planning by the WDP to local areas shows that the 15 ALDLs planned to deliver 998 OJTs, with 270 for adults and 728 for dislocated workers. The estimated investment would be approximately $9.7 million, as shown in Table 2.

Applying a simple linear forecasting formula, it is projected that for the PY 2024 and 2025, 2,186 OJTs will be delivered with a job placement in the second quarter of 364 exiters, as shown in Table 1.

Table 2- Projected Participants OJT PY 2023

PY 2023-24				
LWDA	Adults	Allocation	DW	Allocation
Bayamón	16	$64,392	50	$250,000
Caguas	16	$95,760	96	$574,560
Carolina	44	$333,710	39	$284,453
GTB	10	$60,000	15	$112,500
LM	2	$20,000	9	$90,000

PY 2023-24				
Manatí	82	$351,469	32	$736,000
Mayagüez/LM	8	$54,981	30	$280,500
Noreste	-	-	12	$159,890
Noroeste	50	$90,000	80	$290,000
Norte Central	5	$28,500	14	$98,000
Ponce	10	$14,000	56	$957,600
San Juan	7	$122,385	241	$3,753,000
Sur Central	12	$96,000	21	$168,000
Sureste	5	$50,000	30	$544,481
Suroeste	3	$18,468	3	$18,468
Total	270	$1,399,665	728	$8,317,452

Measurable outcomes that the state projects will result from the implementation of this waiver.

Taking as a parameter the statistics from de PRIS database and the forecasting presented in table 1, the following outcomes are projected for 2023-2025:

Table 3- Waiver Outcomes 2023-2025

PY	Adults	DW	Total
2023	270	728	998
2024	281	759	1,040
2025	309	836.58	1,146
TOTAL	860	2,324	3,184

- The OJT waiver will be extended to all 15 LWDBs, considering the relevance to increasing services to employers and improve the economy.

4. Describe how the waiver will align with the Department's policy priorities, such as: Supporting employer engagement; Connecting education and training strategies; Supporting work-based learning; Improving job and career results; and other priorities as articulated in guidance.

The Workforce Development Program will require the local areas to submit quarterly reports regarding the use of all the approved waivers. The report includes the number of participants, funds allocation and information related to any situation that would affect the waiver implementation. PRDEDC will report on the impact and outcomes of its approved waivers in the WIOA Annual Report.

Policies in place to ensure compliance with OJT requirements.

The State Workforce Development Board (SWDB) approved the public policy WIOA-PP-04-22, Requirements for Workbase Training Activities to provide guidelines for the following WBT activities: On the Job Training (OJT), Customized Training, Incumbent Workers Training, and Registered Apprenticeship. The policy includes a section dedicated to the implementation of the waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720(b) to increase on-the-job training (OJT) employer reimbursement up to 90 percent using a sliding scale based on employer size. In addition, it establishes that On-the-Job Learning (OJL) activities with Related Instruction (RI) of the Registered Apprenticeship Program are considered as the first alternative when offering Training Services.

Other policies approved by the State Board related to the delivery of services, including the OJT services, are:

- WIOA-PP-02-2023- WIOA Title I Adult Program Priority of Services
- DDEC-WIOA-PP-01-2023- Diversity, Equity, Inclusion and Accessibility
- WIOA-PP-03-2023 – Support Services and Needs Related Payments (NRP))
    - WIOA-PP-07-2023- Transfer of Funds between Adult and Dislocated Workers Programs
- DDEC-WIOA-05-2022- Applicability of State Law No. 47 of 2021, on Minimum Wage to Municipal Consortia and Program Participants under the WIOA
- DDEC-WIOA-03-2022- Guidelines Regarding Allowable and Non-Allowable Costs with WIOA Funds
- DDEC-WIOA-004-2022- Applicability of 29CFR38 and 29USC3248 (WIOA) to the provision of services in One-Stop or One-Stop Partners, statutes, and prohibition of discrimination on the basis of race, color, national origin, religion, age, disability, gender, place of residence, political affiliation, or belief, in the provision of service
- DEDC- WIOA- 01- 2021- Policy to comply with the Sunshine Provision for Local Board activities under the Workforce Opportunity and Innovation Act WIOA

- DDEC-WIOA-07-2020- Procedure for the follow-up service required by WIOA for participants of the Adult, Dislocated Worker, and Youth Programs
- DEDC WIOA 08-2020- Case Management and Record-Keeping Policy- Provide guidance for carrying out case management interventions (eligibility, referrals, training activities, employment, etc.) and record-keeping.
- DDEC-WIOA-09-2020- Cost allocation and fund reimbursement
- DDEC-WIOA-11-2020- Payroll Cost Allocation Policy- Guidelines and procedures for payroll based on budget.
- Policy to establish the procedure for the determination of WIOA rules violations and the imposition of state board sanctions.

Waiver will align with the Department's policy priorities with:

- Connecting individuals with chronic unemployment or inconsistent work history with opportunities to build workplace skills and job history, and;
- Inject the economy with skilled individuals that will continue to advance in their specific fields or occupations, and;
- Targeting and improve RAP credential among the workforce system.

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

The need for training is especially acute for those workers most in need: dislocated workers transitioning to new occupations and industries, long-term unemployed individuals in need of advancing outmoded skills in offer to catch up with emerging technologies, and low-income and entry-level workers seeking to start their careers in a weak economic climate. Approval of the waiver will increase training options for WIOA-eligible job seekers.

The reduced match requirement for employers, particularly new start-ups and other small to medium-sized businesses, will provide an attractive and cost-effective financial incentive, increasing the opportunity to utilize the OJT model to hire and train new workers. This waiver will allow Puerto Rico's businesses to adapt to both technological and general marketplace changes more rapidly by improving their capacity to expand and remain competitive with affordable OJT options uniquely designed to achieve their specific development goals.

6. Describes the Process used to:

1. Monitor the progress in implementing the waiver;

The WDP of PRDEDC will monitor progress under this waiver and work with the fifteen (15) local workforce development boards to implement the appropriate state and local policies. The Monitoring Unit will be adding the monitoring of waivers to its monitoring processes to ensure compliance with waiver guidelines.

The Monitoring and Compliance Division of DEDC assesses the Operational, Administrative, and Fiscal Systems using the DEDC Monitoring Rule and the Resolution of Audit Reports of WIOA grants and other funds allocated by USDOL. The DEDC rule defines monitoring as a continuous process of structured assessment of the operations of local areas and sub-recipients to identify at an early stage those inappropriate practices that may result in non-compliance with the purposes of the act and the 20 CFR.

Some of the objectives established in the State Monitoring System, as instituted in the current rule, are:

- Conduct annual on-site monitoring reviews of local areas' compliance with 2 CFR part 200, as required by sec. 184(a)(3) of WIOA.
- Verify expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations.
- Determine the compliance with WIOA regulations and other applicable laws.
- Verify that services to participants qualify for Title I programs and as specified in the Local Plan and annual funding allocation plan.
- Evaluate the internal control structure with respect to these objectives to determine the risk of illegal acts or violations of the Allocation Contract, Applicable Laws, or Regulations.
- Expand the analysis carried out by DDEC units regarding financial reports, identify any deviation or unexpected result reflected in the reports, and corrective actions implemented at the local level.

In summary, the implementation of waivers is one of the areas to be evaluated as part of fiscal and program monitoring. This is even stated in the monitoring guide and in the worksheets used during the review process. In addition to monitoring, we have personnel who are continuously verifying the efficiency and effectiveness of the LWDB.

2. Process for Notice of Local Boards and Opportunity to Comment:

The unified plan and the waiver request were published for a period of four (4) weeks on the PRDEDC website, allowing for public comment on its content and potential impact. In addition, copies of workforce system waivers will be provided to the Major's boards, Local Boards and LDWA's.

- *Public comment period for Unified Plan and Waiver Request.*

The following is the public comment process to the approval of the PR Unified State Plan 2024-2027:

- The Puerto Rico Unified State Plan 2024-2027 draft is published on the DDEC website for review and public comments for a period of four (4) week, beginning on January 22, 2024, until February 21, 2024.
- In addition, the draft plan is sent to all members of the State Workforce Development Board (SWDB) for review and comment.
- Also, the WDP sent the draft to all the presidents of the Local Boards, Chief Elected Officials, and Deputy Directors of the ALDLs, for local dissemination and public comments. The Plan draft must be available at the AJC so that the citizen, participants, partners, and services providers could review and evaluate it. The AJC staff must collect recommendations or comments and send them to the WDP.
- WDP must evaluate all the public comments and recommendations to assess the pertinence with WIOA rule and state policies, objectives, strategic and priorities for the workforce development system.
- The Planning and Executive Committees of the State Board must meet to evaluate the proposed plan and submit their recommendations to the board quorum. The committee must convene all the members for an ordinary meeting for the approval of the Plan.
- A second assessment process will be taken by the state board to submit their comments and recommendations.
- The WDP will assess the state board input and upgrades or change the unified plan according to the state board feedback. The process will be repeated until the board approval of the board.
- The WDP will host an open webinar to discuss the proposed Unified Plan 2024-27, with the presidents of the Local Boards, CEOS, deputy directors, and AJC staff.
- WDP will make a presentation summarizing the plan, including the strategic objectives for the implementation of the Plan and the most significant strategies. Also, include a summary of the waiver's application included in the Plan.

3. Provide any local board affected by the waiver an opportunity to comment on the request;

See process described in previous section.

4. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

See process described in previous section.

5. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

The Workforce Development Program will require the local areas to submit quarterly and annual reports regarding the use of all the approved waivers. The report includes the number of participants, funds allocation and information related to any situation that would affect the waiver implementation. PRDEDC will report on the impact and outcomes of its approved waivers in the WIOA Annual Report.

WDP has been assigned a coordinator, which oversees the local board, on the process of monitoring the use of the waiver and filing quarterly reports on time. In addition, at the end of the program year, the WDP requires all local boards to submit an annual narrative report on the activities and services delivered in the program year, which includes the use of the waivers.

The WDP provides ongoing technical assistance on the use of the waiver, in areas like tracking the funds and participants impacted through the waiver. This technical assistance is offered through webinars, which are recorded and maintained on the DEDC website for access at any time. Quarterly and annual reports include a standard worksheet with instructions for filing quarterly reports and the annual report on the use of waivers.

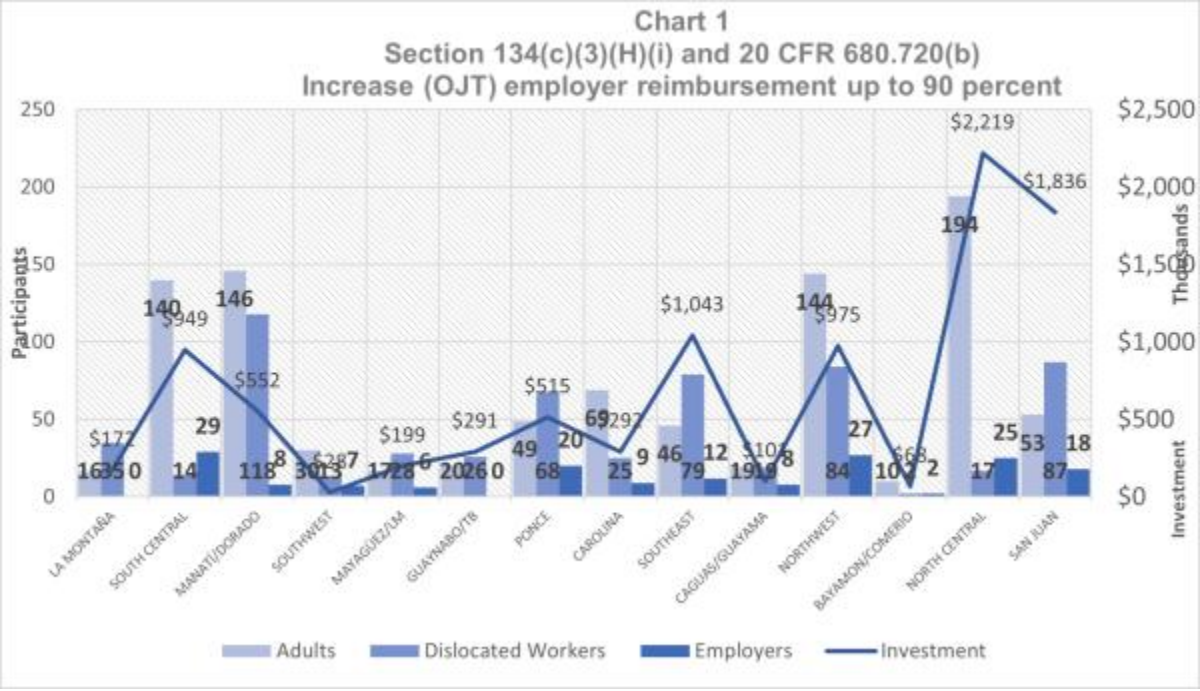
7. The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

This waiver was approved by USDOL on June 7, 2022, and it will be valid until June 30, 2024. The waiver allows Puerto Rico's businesses to rapidly adapt to technological and general marketplace changes by improving their capacity to expand and remain competitive with affordable OJT options uniquely designed to achieve their specific development goals. The reduced match requirement for employers, particularly new start-ups and small to medium-sized businesses, provide an attractive and cost-effective financial incentive, increasing the opportunity to utilize the OJT model for hiring and training new workers. From an economic development standpoint, increasing the number and quality of the labor force stimulates the competence and competitiveness of Puerto Rico's economy.

This waiver has been a great tool to help LWDA's to attract new employees to the workforce system. For example, during PY22 this waiver was used by fourteen (14) LWDA's with a participation of 171 employers and 1,568 employees, 953 adults, and 615 dislocated workers, with a total expenditure of $9,239,516. The waiver has been responsible for increasing employee

and employer participation. As shown in chart 1, the LWDA's had an extremely satisfactory performance.

The LWDA's that benefited most from the waiver according to the information provided on their expenditures are North Central ($2,218,758), San Juan ($1,836,160) and Southeast ($1,042,524). Based on the labor and business sector background in Puerto Rico, the impact of the waiver is increasing the opportunity to promote job skills improvement, job creation, and business sustainability of various economic regions of Puerto Rico. As a result, with the data provided by the LDWA's, we expect an increase in the participation of employers, adults, displaced workers, and youth, as well as in the investment of funds for PY 2023.



Source: Puerto Rico Annual Report (2022)

- Implementation of this waiver in previous years

The data presented is the official data registered in the Participant Record Information System (PRIS).

- Tables 1 above show the official data for the delivery of training services in the period 2020-2022, both at the state level and in 15 local areas. It also includes the number of participants entering employment for the second and retained in the fourth quarter.
- In PY 2020, 8% of the training delivered at the state level was OJT. In the second quarter, 68% of participants with programmatic exit were employed, and 76% were retained in employment for the fourth quarter.

- In PY 2021, 10% of training offered were OJT, with 66% employed in the second quarter and 66% with retention in the fourth quarter.
- For PY 2022, 522 on-the-job training were offered, with a placement of 39% in employment in the second quarter and a retention rate of 4% in the fourth quarter.
- In PY 2023, the approved planning by the WDP to local areas shows that the 15 ALDLs planned to deliver 998 OJTs, with 270 for adults and 728 for dislocated workers. The estimated investment would be approximately $9.7 million, as shown in Table 2.

Waiver of the requirement under WIOA 129(a)(4), and consistent with 20 CFR 681.410, that states and local areas must expend a minimum of 75 percent of their Youth formula funds on youth workforce activities for out-of-school youth (OSY).

1. Statutory and/or regulatory requirements to be waived:

PRDEDC requests a waiver of the requirement under WIOA §129(a)(4), and consistent with 20 CFR 681.410, that States and local areas must expend a minimum of 75 percent of their youth formula funds on youth workforce activities for out-of-school youth (OSY).

The use of this waiver is limited to emergency, disaster-related needs only. Puerto Rico is exposed to the onslaught of natural disasters like hurricanes, earthquakes, pandemic like COVID-19, causing the shutdown of economic activity and the loss of thousands of jobs throughout the recovery process. Local economists forecast that Puerto Rico will face an economic contraction that can extend for the next ten years. After a disaster, the Local Areas will be facing an increase in the demand for jobs, due a lot of job sites are destroyed or will not be able to restart operations because of the instability of infrastructure, lack of financial resources or the decrease in product production.

This situation directly impacts OSY and ISY. The OSY is a hard to serve population, given that they require a combination of educational and employment services that are not available every time the island is facing an emergency scenario. It is reasonable to expect that many youth service providers are unable to provide services due to the damage suffered in their infrastructure, loss of employees or permanent closures. OYS are also competing for jobs opportunities with unemployed adults and dislocated workers, during the recovery process. These two factors make it difficult for the workforce system to reach the WIOA requirement to meet the 75% OSY during a national emergency like hurricanes, earthquakes, or worldwide diseases.

On the other hand, demand for services for ISY increases considerably in the face of emergencies, as schools must close during and after hurricanes, others have been destroyed by earthquakes and a large number become obsolete due to damage in its structure. In the case of pandemics, all schools have been forced to a full lockout. In these events ISYs will experience an increase in the need for services to meet their needs. The elements of the youth program are an alternative to support ISYs in receiving educational services in an emergency.

Nonetheless, Puerto Rico continues its efforts to provide employment and education services for out-of-school youth (OSY). Is necessary to promote the holistic development of youth to foster their economic self-sufficiency to the extent that barriers to employment and access to education are broken down, including OSY and ISY population.

2. Actions undertaken to remove state or local barriers:

Describe the actions undertaken to remove state or local barriers.

There are no State or local statutory or regulatory barriers for the implementation of the proposed waiver.

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

This waiver will provide Local Boards the necessary flexibility to use Youth formula funds, when appropriate, to meet the individual training and employment needs of all youth affected by an emergency.

The expect outcomes are as follow:

- Improve the ability of LWDAs to develop workforce strategies that align with economic realities within their workforce area;
- Improve the ability for LWDAs to design programs in response to the needs of their customers.
- Provides In-School Youth more choice opportunities to enter into post-secondary education, vocational training or a “learn and earn” opportunity through Pre-Apprenticeship Programs in order for them to increase math, literacy, vocational and pre-vocational skills needed to gain entry into a Registered Apprenticeship Program.

The waiver to WIOA section 129(a)(4) was approved to PR on June 7, 2022, and is valid until June 30, 2024. The Table 1 shows the registered youth in the database Participants Record Information System (PRIS), from 2018, until the current program year. This waiver increases the number of In-School Youth (ISYs) that receive services in the AJC, with over 50% of in-school youth.

Youth Registration in PRIS 2018-2023

	OSY	%	ISY	%	TOTAL	% OSY Expenditure
2018	3,388	53%	3,023	47%	6,411	69%
2019	2,437	50%	2,423	50%	4,860	66%

	OSY	%	ISY	%	TOTAL	% OSY Expenditure
2020	1,527	45%	1,866	55%	3,393	69%
2021	1,120	40%	1,682	60%	2,802	59%
2022	2242	45%	2707	55%	4,949	
2023*	498	46%	572	54%	1,070	

*Data until Q1,Q2

Services for out-of-school youth (OSY), are more expensive because OSY needs a comprehensive service strategy that includes education, training, employment, and support services, among others.

The data from the annual narrative report presents the data of the youth served by the local boards who requested the use of this waiver. Based on the quarterly report data gathered by the WDP, a simple linear projection was made for the PY 2023-2025.

The following table shows a forecasting of the youth expected to be served under this waiver. The expected outcomes are more than three thousand youth delivery of service under the waiver in the three program years, in an average of 8 local areas that will request the use of it.

						Projected		
	2018	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
ISY	1,588	1,835	1,436	1,148	2,124	*1,742*	*1,807*	*2,052*
OSY	2,160	1,625	1,503	926	1,145	*1,492*	*1,377*	*1,361*
Total	3,748	3,460	2,939	2,074	3,269	*3,234*	*3,185*	*3,414*

4. **Department of Labor's policy priorities:**

Describe how the waiver will align with the Department's policy priorities, such as: Supporting employer engagement; Connecting education and training strategies; Supporting work-based learning; Improving job and career results; and other priorities as articulated in guidance.

- Maximize the flexibility needed to ensure speedy implementation of work-based learning opportunities that WIOA encourages for both formula and discretionary grants;
- Increase business usage of the workforce system and thereby achieve greater access to employment opportunities for youth;

- Provide greater incentives for employers to retain and retrain current employees to avoid layoffs and to create new jobs;
- Create additional opportunities for new workers, and for unemployed and underemployed workers to speed up their return to full-time employment; and
- Support Puerto Rico's small and medium-sized businesses and the entrepreneurial start-up economy.

5. Individuals impacted by the waiver:

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

This waiver applies to the fifteen (15) LWDAs that compose Puerto Rico's Workforce Delivery System. All fifteen (15) LWDAs provide services to both out of school, and in-school youth.

6. Describes the Process used to:

1. Monitor the progress in implementing the waiver;

The WDP of PRDEDC will monitor progress under this waiver and work with the fifteen (15) local workforce development boards to implement the appropriate state and local policies. The Monitoring Unit will be adding the monitoring of waivers to its monitoring processes to ensure compliance with waiver guidelines.

The Monitoring and Compliance Division of DEDC assesses the Operational, Administrative, and Fiscal Systems using the DEDC Monitoring Rule and the Resolution of Audit Reports of WIOA grants and other funds allocated by USDOL. The DEDC rule defines monitoring as a continuous process of structured assessment of the operations of local areas and sub-recipients to identify at an early stage those inappropriate practices that may result in non-compliance with the purposes of the act and the 20 CFR.

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- Verify expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations.
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- Verify that services to participants qualify for Title I programs and as specified in the Local Plan and annual funding allocation plan.

- Evaluate the internal control structure with respect to these objectives to determine the risk of illegal acts or violations of the Allocation Contract, Applicable Laws, or Regulations.
- Expand the analysis carried out by DDEC units regarding financial reports, identify any deviation or unexpected result reflected in the reports, and corrective actions implemented at the local level.

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- WDP must evaluate all the public comments and recommendations to assess the pertinence with WIOA rule and state policies, objectives, strategic and priorities for the workforce development system.
- The Planning and Executive Committees of the State Board must meet to evaluate the proposed plan and submit their recommendations to the board quorum. The committee must convene all the members for an ordinary meeting for the approval of the Plan.

- A second assessment process will be taken by the state board to submit their comments and recommendations.
- The WDP will assess the state board input and upgrades or change the unified plan according to the state board feedback. The process will be repeated until the board approval of the board.
- The WDP will host an open webinar to discuss the proposed Unified Plan 2024-27, with the presidents of the Local Boards, CEOS, deputy directors, and AJC staff.
- WDP will make a presentation summarizing the plan, including the strategic objectives for the implementation of the Plan and the most significant strategies. Also, include a summary of the waiver's application included in the Plan.

3. Provide any local board affected by the waiver an opportunity to comment on the request;

See process described in previous section.

4. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

See process described in previous section.

5. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

The Workforce Development Program will require the local areas to submit quarterly and annual reports regarding the use of all the approved waivers. The report includes the number of participants, funds allocation and information related to any situation that would affect the waiver implementation. PRDEDC will report on the impact and outcomes of its approved waivers in the WIOA Annual Report.

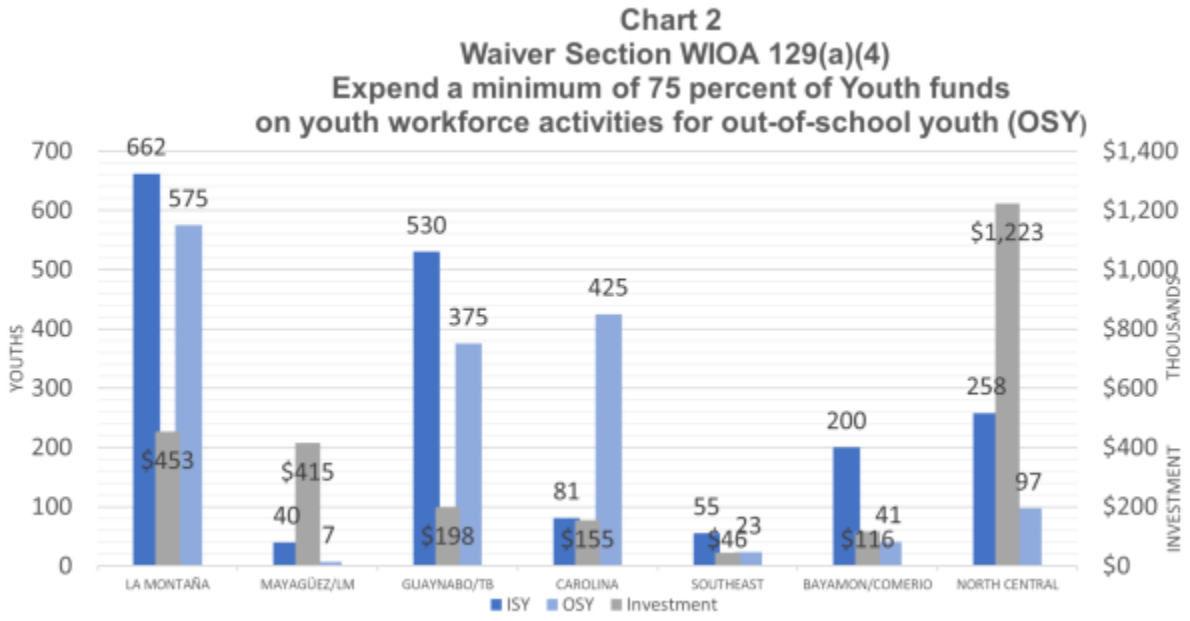
WDP has been assigned a coordinator, which oversees the local board, on the process of monitoring the use of the waiver and filing quarterly reports on time. In addition, at the end of the program year, the WDP requires all local boards to submit an annual narrative report on the activities and services delivered in the program year, which includes the use of the waivers.

The WDP provides ongoing technical assistance on the use of the waiver, in areas like tracking the funds and participants impacted through the waiver. This technical assistance is offered through webinars, which are recorded and maintained on the DEDC website for access at any time. Quarterly and annual reports include a standard worksheet with instructions for filing quarterly reports and the annual report on the use of waivers.

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.

This waiver was aproved in June 7, 2022, and is curently valid until June 30, 2024. The chart below, details the use of the same by the participating LWDA's. Puerto Rico continues its efforts to provide employment and education services for out-of-school youth (OSY). Given the economic rising that the island is experiencing, it is necessary to promote the holistic development of youth to foster their economic self-sufficiency to the extent that barriers to employment and access to education to OSY and ISY population.

The chart below shows the participation of OSY and ISY for the PY22, as presented in the Annual Report Narrative 2022. The approval of waivers in previous years had a significant effect in increasing ISY participation. The seven (7) local areas that used the waiver in the aggregate reported expenditures of $2.6 million during the PY22. The LWDA of North Central reported the highest expenditures and La Montaña the largest number of participants. The chart shows the relationship between participation and expenditures in the WIOA Youth Program. It should be noted that the participating LWDA's continued to provide services to OSY, and the data reflects that the provided OSY services did not decrease. In simpler words, the number of OSY is approximately near than ISY, with 1,543 OSY and 1,826 ISY, as shown in chart 2.



Source: PR Annual Report PY 2022

Waiver to allow flexibility in the use of funds reserved by the Governor to provide statewide rapid response activities to instead provide statewide employment and training activities, including disaster relief employment to affected areas

1. Statutory and/or regulatory requirements to be waived:

The Commonwealth of Puerto Rico, through the Department of Economic Development and Commerce (DEDC), the WIOA Title I-B grantee, seeks a waiver allowance of WIOA section 134(a)(2)(A), (2)(B) and (3) to allow flexibility in the use of the funds reserved by the Governor for use to provide statewide rapid response activities (i.e. WIOA section 134(a)(2)(A)), and for use to provide statewide employment and training activities (i.e. WIOA section 134(a)(2)(B) and (3)) to provide disaster recovery assistance to affected areas as describe in WIOA 170(d) and 20 CFR 687.100(b), for program years 2024 and 2025, in case then PR face any disaster qualifying event by FEMA..

The set of Governor's reserved statewide funds shall be described in this waiver allowance request as "WIOA statewide funds". Under this waiver allowance the funds described at WIOA section 134(a)(2) and (3) may be used interchangeably.

Under this waiver allowance, permitted WIOA statewide fund use includes, but is not limited to:

- Provide disaster relief services immediately upon the event, maximizing the use of funds available from the state's reserve of the dislocated workers program, before applying for funds from the National Dislocated Workers Grant (NDWG).
- Expeditious allocation of funds to a local workforce development board, or local board, so they may respond quickly to a disaster, emergency, or other qualifying event as described at 20 CFR 687.l00(b). Only those events, and cascading events caused by a qualifying event, that have been declared as an emergency or disaster by the Federal Emergency Management Agency (FEMA), by the chief official of a Federal Agency with jurisdiction over the Federal response to a disaster with potential significant loss of employment, or the Governor of Puerto Rico qualify for the use of WIOA statewide funds.
    - To alleviate the effects that a qualifying event causes within affected local area(s), and/or planning regions, WIOA statewide funds will allow comprehensive disaster relief employment and employment and training activities, and the provision of needed humanitarian resources and services, including other services or resources deemed necessary as described at 20 CFR 687.180(b)(1).
    - An individual's disaster relief employment is limited to 12 months or 2,080 hours for work related to recovery from a single emergency or disaster. The Workforce Development Program (WDP) of the DEDC may extend an individual's disaster relief employment for up to an additional 12 months or 2,080 hours if requested and sufficiently justified by the local board.
    - Supportive services may be provided to enable individuals to participate in disaster relief employment, and employment and training activities, including

such costs as transportation, childcare, and personal safety equipment and clothing consistent with local policies.

- Individuals shall be eligible to be offered disaster relief employment and employment and training services if such individual is a dislocated worker; is a long-term unemployed individual as defined by the State; is temporarily or permanently laid off as a consequence of the emergency or disaster; or in the case of an individual who is self-employed, becomes unemployed or significantly underemployed as a result of the emergency or disaster.

2. Actions undertaken to remove state or local barriers:

The Commonwealth of Puerto Rico established the Puerto Rico State Agency for Emergency and Disaster Management —Spanish: Agencia Estatal para el Manejo de Emergencias y Administración de Desastres (AEMEAD)— as the agency that oversees all emergency activities that occur in Puerto Rico. Within all local workforce development areas, or local areas, there are responsible entities marshalled by local government, or its agents, should a qualifying event occur. The AEMEAD works in concert with these entities to provide resources and expertise.

The Government of Puerto Rico will apply for National Dislocated Worker Grants (NDWG), consistent with WIOA Sec. 170 and its corresponding regulatory requirements. The NDWG grants are helpful once allocated, but in the time between the event and allocation, aid is urgently needed and there is much work to be done. If months pass before the NDWG allocation occurs, damage can be exacerbated, and work is not completed. The Government is mindful of this time gap and strives to apply as soon as the state is eligible for NDWG funding assistance, as appropriate. The efficient use of time right after a qualifying event occurs is a critical variable in how well recovery is measured.

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

This waiver will allow the Commonwealth of Puerto Rico to efficiently and effectively respond to disasters by aligning the program requirements of a disaster recovery project regardless if they are funded with WIOA Statewide Rapid Response funds or the National Dislocated Worker Grant Program. In the case of a qualifying event, the State intends to use WIOA statewide funds so that relevant workforce development responses are provided in a timely manner. WIOA statewide funds may be provided to local areas deemed in need of financial resources because of being affected by a qualifying event.

The use of WIOA statewide funds associated with this waiver supports the state's goal of local WIOA based programs and activities that better serve targeted groups of workforce development system customers. The use of WIOA statewide funds offers greater flexibility so that the state and local governing entities can expand their ability to coordinate resources, services and activities

for individual, workers and employers affected by the qualifying emergency and/or disaster event. The state will use WIOA statewide funds to ensure that critical, time-sensitive work can be performed, and the potential participant pool is widened. The waiver flexibility permits local areas the latitude to marshal available labor, conduct appropriate training, enable required resources to be requisitioned quickly, and provide immediate and comprehensive disaster recovery assistance, including efforts to minimize further disaster impacts.

The waiver to WIOA section 134(a)(2)(A), (2)(B) and (3) was approved to PR on October, 6 2022, and is valid until June 30, 2024. During the validity of the waiver, the DEDC attended two disaster events using the flexibility in the use of the funds, the attention to dislocated workers by Hurricane Fiona in September 2022, as well as those dislocated by COVID-19.

Temporary Jobs Hurricane FIONA

Temporary employment activities were carried out in 12 local areas to address emergency needs, with functions such as cleaning and disinfection of common areas in municipal and recreational offices, maintenance of green areas, streets, roads, debris collection, assistance in the distribution of essential materials to the population, collect and dispose of food, provide detailed guidance on safety protocols, support the call center related to emergency management, conduct phone interviews, emails, in-person, or other methods for disaster-related requests for information. The total number of impacted participants was 775 with an investment of $4,160,258.26.

Home Care Aides Project

This project, developed with funds from the state reserve of the dislocated workers program, has the purpose of providing a credential for Home Care Aides, for out-of-school youth affected by the pandemic, people with long-term unemployment and displaced by the COVID-19 pandemic. This initiative is in the process of being implemented and is expected to be completed in PY 2023, with 100% colocation in employment.

The outcomes of this project are presented in the following table:

Home Care Aides

LWDA	OSY	DW	Total Participants	Allocation OSY	Allocation DW	Total Allocation
Guaynabo-Toa Baja	10	40	50	$145,260	$581,040	$726,300
La Montaña	25	110	135	$363,150	$1,597,860	$1,961,010
Mayaguez-Las Marias	10	60	70	$145,260	$871,560	$1,016,820

LWDA	OSY	DW	Total Participants	Allocation OSY	Allocation DW	Total Allocation
Noreste	45	180	225	$653,670	$2,614,680	$3,268,350
Norte Central	40	160	200	$581,040	$2,324,160	$2,905,200
Noroeste	35	140	175	$508,410	$2,033,640	$2,542,050
Ponce	5	20	25	$72,630	$290,520	$363,150
Sur Central	25	100	125	$363,150	$1,452,600	$1,815,750
Sureste	35	140	175	$508,410	$2,033,640	$2,542,050
Suroeste	50	200	250	$726,300	$2,905,200	$3,631,500
Caguas-Guayama	40	160	200	$581,040	$2,324,160	$2,905,200
Total	**320**	**1,310**	**1,630**	**$4,648,320**	**$19,029,060**	**$23,677,380**

The state estimates that the waiver will improve outcomes and provide other tangible benefits in the following ways:

- Increase statewide and local area workforce development response times to a qualifying event;
- Increase public safety and help support humanitarian activities;
- Availability of disaster relief employment will provide grant participants with access to employment and training activities;
- Increasing of eligible grant participant's employment and training activities will lead towards a higher probability of securing unsubsidized employment; and
- Alignment with Department of Labor’s policy priorities

After hurricanes Irma and María in 2017 approximately 2,200 dislocated workers participated from temporary workers. For COVID-19 Pandemic we impacted 1,518 dislocated workers who helped with the cleaning and disinfection of common areas, but also supported the delivery of supplies and other humanitarian aid. For hurricane Fiona disaster were served 775 participants.

Based on the outcomes of the participants during the emergencies of Hurricanes Irma, Maria and Fiona, earthquakes, and pandemics, it is estimated that the implementation of this waiver in the event of a possible natural disaster, the following participants can be delivered in temporary by local Area:

Local Area	Participants	
Bayamón-Comerío	50	Clean-up, Emergency and Humanity Services
Caguas-Guayama	75	Clean-up, Emergency and Humanity Services
Carolina	25	Clean-up, Emergency and Humanity Services
Guaynabo- Toa Baja	75	Clean-up, Emergency and Humanity Services
La Montaña	75	Clean-up, Emergency and Humanity Services
Manatí-Dorado	125	Clean-up, Emergency and Humanity Services
Mayaguez-LM	150	Clean-up, Emergency and Humanity Services
North Central Arecibo	250	Clean-up, Emergency and Humanity Services
Northeast	75	Clean-up, Emergency and Humanity Services
Northwest	200	Clean-up, Emergency and Humanity Services
Ponce	150	Clean-up, Emergency and Humanity Services
San Juan	50	Clean-up, Emergency and Humanity Services
South Central	200	Clean-up, Emergency and Humanity Services
Southeast	150	Clean-up, Emergency and Humanity Services
Southwest	350	Clean-up, Emergency and Humanity Services

Local Area	Participants	
Total	2,000	

4. Describe how the waiver will align with the Department's policy priorities, such as: Supporting employer engagement; Connecting education and training strategies; Supporting work-based learning; Improving job and career results; and other priorities as articulated in guidance.

This waiver aligns with not only the Department of Labor's priorities. This will allow the state to temporarily expand service capacity at the local level through time-limited funding assistance in response to significant disasters.

Expanding the ability for the state to provide disaster related employment opportunities through statewide funding allows participants to develop skills that will better prepare them to obtain permanent employment.

5. Individuals, groups or populations benefitting, or otherwise impacted by the waiver from the waiver

The waiver will positively impact:

- All eligible participants as identified at WIOA section 170 and 20 CFR 687.170 which include dislocated workers, long-term unemployed individuals as defined by the State, temporarily or permanently laid off workers as a consequence of the emergency or disaster, or in the case of an individual who is self-employed, becomes unemployed or significantly underemployed as a result of the emergency or disaster; and
- Non-WIOA eligible recipients include affected businesses and employers, residents and other individuals that benefit from the qualifying event clean-up, restoration and humanitarian activities, and resources provided.

6. Describes the processes used to:

1. Monitor the progress in implementing the waiver;

Emergency qualifying events

The state will use the following approach for monitoring progress in implementation:

Workforce Development Program (WDP) leadership will determine if the qualifying event requires the use of WIOA statewide funds and will approve parameters for the project and be the operational lead. Applicable federal, state and local laws, regulations, policies and procedures will be used to ensure fiscal accountability. Unless otherwise authorized in this waiver, the financial and administrative rules contained in the Workforce Innovation and Opportunity Act; Final Rule (i.e. 20 CFR 683) will apply.

• Completed Request for Funds form with local board signatory authorizing request;

- Official declaration documenting the emergency and/or disaster event;
- Narrative will include, at a minimum, summary of the event, preliminary assessment of the cleanup, humanitarian needs of the affected areas, and will demonstrate whether there is a sufficient population of eligible individuals to conduct the planned work;
- Budget and budget justification; and
- Completed worksite summary.

The WDP will receive monthly project status reports and will host teleconferences with project stakeholders as necessary to monitor project status. At a minimum, funding recipients will provide the WDP with the following information for review:

- Revised narrative and associated attachments when a modification is required;
- Monthly Financial Status Reports;
- Monthly project status report of project activities; and
- Data entry for all participant service in the state system of PIRL system.

Only local boards will be the recipient of WIOA statewide funding for qualifying events. If a qualifying event occurs in a local area, the state requires the respective local board to collaborate with local governments and other recognized entities to determine whether workforce development-oriented services and activities are warranted. Local boards may work with their respective local area fiscal agents to complete and submit the funding request to WDP. Local boards will work with one-stop operator(s) to communicate the funding parameters to workforce development system partners and other service providers. Participant activity is to be recorded in the state system of record.

All funds obligated will be accounted for in the financial management system, the MIP. Case management and related source documentation associated with the emergency and/or disaster must include the qualifying event as a point of reference.

State staff who administer programming will provide ongoing technical assistance and oversight as it relates to the appropriateness and the effectiveness of this waiver.

Annual WIOA on-site programmatic reviews will include an evaluation of the impact the waivers have on programmatic goals and outcomes.

Operational, Administrative, and Fiscal Monitoring

The WDP of PRDEDC will monitor progress under this waiver and work with the fifteen (15) local workforce development boards to implement the appropriate state and local policies. The

Monitoring Unit will be adding the monitoring of waivers to its monitoring processes to ensure compliance with waiver guidelines.

The Monitoring and Compliance Division of DEDC assesses the Operational, Administrative, and Fiscal Systems using the DEDC Monitoring Rule and the Resolution of Audit Reports of WIOA grants and other funds allocated by USDOL. The DEDC rule defines monitoring as a continuous process of structured assessment of the operations of local areas and sub-recipients to identify at an early stage those inappropriate practices that may result in non-compliance with the purposes of the act and the 20 CFR.

Some of the objectives established in the State Monitoring System, as instituted in the current rule, are:

- Conduct annual on-site monitoring reviews of local areas' compliance with 2 CFR part 200, as required by sec. 184(a)(3) of WIOA.
- Verify expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations.
- Determine the compliance with WIOA regulations and other applicable laws.
- Verify that services to participants qualify for Title I programs and as specified in the Local Plan and annual funding allocation plan.
- Evaluate the internal control structure with respect to these objectives to determine the risk of illegal acts or violations of the Allocation Contract, Applicable Laws, or Regulations.
- Expand the analysis carried out by DDEC units regarding financial reports, identify any deviation or unexpected result reflected in the reports, and corrective actions implemented at the local level.

In summary, the implementation of waivers is one of the areas to be evaluated as part of fiscal and program monitoring. This is even stated in the monitoring guide and in the worksheets used during the review process. In addition to monitoring, we have personnel who are continuously verifying the efficiency and effectiveness of the LWDB.

2. Process for Notice of Local Boards and Opportunity to Comment:

The unified plan and the waiver request were published for a period of four (4) weeks on the PRDEDC website, allowing for public comment on its content and potential impact. In addition, copies of workforce system waivers will be provided to the Major's boards, Local Boards and LDWA's.

Public comment period for Unified Plan and Waiver Request.

The following is the public comment process to the approval of the PR Unified State Plan 2024-2027:

- The Puerto Rico Unified State Plan 2024-2027 draft is published on the DDEC website for review and public comments for a period of four (4) week, beginning on January 22, 2024, until February 21, 2024.
- In addition, the draft plan is sent to all members of the State Workforce Development Board (SWDB) for review and comment.
- Also, the WDP sent the draft to all the presidents of the Local Boards, Chief Elected Officials, and Deputy Directors of the ALDLs, for local dissemination and public comments. The Plan draft must be available at the AJC so that the citizen, participants, partners, and services providers could review and evaluate it. The AJC staff must collect recommendations or comments and send them to the WDP.
- WDP must evaluate all the public comments and recommendations to assess the pertinence with WIOA rule and state policies, objectives, strategic and priorities for the workforce development system.
- The Planning and Executive Committees of the State Board must meet to evaluate the proposed plan and submit their recommendations to the board quorum. The committee must convene all the members for an ordinary meeting for the approval of the Plan.
- A second assessment process will be taken by the state board to submit their comments and recommendations.
- The WDP will assess the state board input and upgrades or change the unified plan according to the state board feedback. The process will be repeated until the board approval of the board.
- The WDP will host an open webinar to discuss the proposed Unified Plan 2024-27, with the presidents of the Local Boards, CEOS, deputy directors, and AJC staff.
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3. Provide any local board affected by the waiver an opportunity to comment on the request;

See process described in previous section.

4. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

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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.

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Home Care Aides

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Ponce	5	20	25	$72,630	$290,520	$363,150
Sur Central	25	100	125	$363,150	$1,452,600	$1,815,750
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Total	**320**	**1,310**	**1,630**	**$4,648,320**	**$19,029,060**	**$23,677,380**

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WAIVER TO ALLOW USE OF SUPPORTIVE SERVICES

1. Statutory/Regulatory Requirements to be Waived

The Commonwealth of Puerto Rico is seeking a waiver from the requirements outlined in WIOA Section 134(d)(2) and 20 CFR 680.910 to allow use of supportive services.

2. Removal of State or Local Barriers

There are no known state-level, local statutory, or regulatory barriers in Puerto Rico related to implementing the requested waiver.

3. Puerto Rico's Strategic Goals

This waiver request supports Puerto Rico's five strategic pillars:

1. Build a Talent-Ready Puerto Rico: Aligning workforce development with long-term economic growth and reshoring opportunities

High-growth industries require certifications that can take months to earn. Extending supportive services prevent employed individuals from dropping out due to a single life emergency, like a car breakdown or utility shut-off, ensuring a steady pipeline of talent. In addition, by covering services such as transportation or equipment, we can ensure that a talent-ready pool is drawn from the entire island, not just those living in urban centers near training facilities.

2. Establish a Workforce Reshoring Model: PRDEDC launched the Puerto Rico Workforce Reshoring Fund initiative, designed to assess workforce readiness and strengthen talent pipelines for priority industries such as pharmaceutical manufacturing, advanced manufacturing, medical devices, biotechnology, IT and aerospace.

Reshoring pharmaceutical and aerospace manufacturing requires a workforce capable of working in highly regulated, 24/7 environments. Extending childcare supportive services specifically for non-traditional hours is essential for parents to participate in these priority reshoring sectors.

3. Leverage Funding: Braiding WIOA resources, particularly state reserve funds—with new workforce initiatives to scale training programs that demonstrate strong employment outcomes.

4. Expanding Apprenticeships & Work-Based Learning: Scaling Apprenticeship and other work-based learning models across priority industries.

Supportive services provide a financial cushion during the early stages of an apprenticeship. This allows participants to stay in the program until they reach the journey-level wages that lead to self-sufficiency. Priority industries like aerospace and advanced manufacturing require expensive specialized tools or safety gear. Extending supportive services to cover these costs removes the upfront financial burden from the apprentice.

5. Create Sustainable Workforce Financing: Exploring innovative financing models, including a revolving workforce development fund, to ensure long-term sustainability and allow successful training initiatives to be reinvested and expanded.

Innovative models like revolving funds depend on successful employment outcomes- participants getting jobs and generating tax revenue. Data shows that participants with access to supportive services have significantly higher job placement and retention rates. By investing in supportive services, we will be supporting higher employment retention rates which leads to the sustainable reinvestment needed to scale the model island-wide.

4. Quantifiable Programmatic Outcomes

DEDC would establish a goal of shifting the Employment Rate (2nd and 4th Quarter after Exit) upwards by 5 percent.

5. Benefiting individuals and groups

The waiver will benefit all populations seeking employment. It will also benefit businesses that engage with the workforce system.

6. Monitoring of Waiver Implementation

Several entities within Puerto Rico's Department of Economic Development & Commerce (DEDC) will monitor the waiver implementation in Puerto Rico:

- DEDC will provide guidance to the local areas on a supportive services policy and evaluate the impact implementing the waiver has on Puerto Rico's performance goals;

- DEDC's Monitoring and Compliance Unit will monitor Local Areas to ensure compliance with the new waiver requirements; and,

- DEDC's performance unit will stay abreast of waiver impact and all outcomes will be included in the WIOA Annual Report.

7. Assurance of Posting for Public Comment

DEDC will be posting this waiver for public comment in conjunction with the WIOA State Plan Modification

WAIVER TO ALLOW LOCAL AREAS to PROVIDE ISY WITH ITAS

1. Statutory/Regulatory Requirements to be Waived

The Commonwealth of Puerto Rico is seeking a waiver from the requirements outlined in 20 CFR 681,550 to allow local areas to provide In-School Youth (ISY) with individual training accounts (ITAs).

2. Removal of State or Local Barriers

There are no known state-level, local statutory, or regulatory barriers in Puerto Rico related to implementing the requested waiver.

3. Puerto Rico's Strategic Goals

This waiver request supports Puerto Rico's five strategic pillars:

1. Build a Talent-Ready Puerto Rico: Aligning workforce development with long-term economic growth and reshoring opportunities

Providing ITAs to ISY represents a positive strategic shift in workforce policy. Extending them to youth in Puerto Rico provides a faster-track to high-demand technical careers. ITAs empower students to move beyond the traditional education path and gain industry-recognized credentials while still in high school or early college. By providing ITAs, Puerto Rico aligns the career interests of its youngest workers with the island's long-term economic growth sectors, i.e. aerospace and

biosciences. This strategy also shortens the time between education and employment, creating a "talent-ready" workforce that can meet the immediate needs of companies reshoring to the island.

2. Establish a Workforce Reshoring Model: PRDEDC launched the Puerto Rico Workforce Reshoring Fund initiative, designed to assess workforce readiness and strengthen talent pipelines for priority industries such as pharmaceutical manufacturing, advanced manufacturing, medical devices, biotechnology, IT and aerospace.

Priority industries like pharmaceutical and medical device manufacturing require highly specific technical skills. ITAs allow In-School Youth to choose specialized training programs—such as those vetted by the Workforce Reshoring Fund—ensuring the youth pipeline is not just educated, but technically proficient in priority sectors. Because ITAs are used for programs on the Eligible Training Provider List (ETPL), they ensure that youth are only spending resources on curricula that have been validated by the very industries Puerto Rico is looking to reshore.

3. Leverage Funding: Braiding WIOA resources, particularly state reserve funds—with new workforce initiatives to scale training programs that demonstrate strong employment outcomes.

Providing ITAs to Youth maximizes our return on investment. ITAs are performance-based. By focusing these funds on programs with demonstrated employment outcomes, Puerto Rico ensures that braided federal and state dollars are only supporting the most successful training providers.

4. Expanding Apprenticeships & Work-Based Learning: Scaling Apprenticeship and other work-based learning models across priority industries.

ITAs can serve as the classroom component of a Registered Apprenticeship. For ISY, an ITA can fund the pre-apprenticeship training required to enter a high-level aerospace or IT apprenticeship. ITAs also reduces the financial burden on employers. If an ITA covers the cost of the Related Technical Instruction (RTI), small and medium-sized advanced manufacturing firms are more likely to take on young apprentices, as the training costs are already subsidized.

5. Create Sustainable Workforce Financing: Exploring innovative financing models, including a revolving workforce development fund, to ensure long-term sustainability and allow successful training initiatives to be reinvested and expanded.

ITAs provide the perfect data-tracking mechanism for innovative financing models like revolving funds. Because ITAs are tracked individually in systems like PRIS, the state can measure the exact return on Investment for every youth participant. When youth trained via ITAs enter high-paying reshoring industries, the economic boost (through taxes or direct reinvestment models) feeds back into the workforce fund. This creates a sustainable cycle where the success of today’s youth graduates funds the ITAs for the next generation of Puerto Rican students.

4. Quantifiable Programmatic Outcomes

DEDC would establish a goal of shifting the Employment Rate (2nd and 4th Quarter after Exit) upwards by 5 percent.

5. Benefiting individuals and groups

The waiver will specifically benefit younger youth seeking employment tied to Puerto Rico's in-demand, and higher paying industry sectors. It will also benefit businesses that engage with the workforce system.

6. Monitoring of Waiver Implementation

Puerto Rico's Department of Economic Development & Commerce (DEDC) performance team will monitor the waiver implementation in Puerto Rico:

- DEDC's performance unit will stay abreast of waiver impact and all outcomes will be included in the WIOA Annual Report. Since ITAs are intended for talent-ready certification, the performance team will track the Credential Attainment Rate specifically tied to the ETP (Eligible Training Provider) list.

- DEDC's performance team will also track the Measurable Skill Gains (MSG) during the training, such as passing a technical exam or completion of a specific reshoring training module. This will allow the team to intervene if a specific training provider has low MSG rates.

- The Workforce Development Unit at DEDC will also analyze and map these credentials against the Reshoring Fund priorities to determine success in feeding the reshoring pipeline.

- The Workforce Development Unit will also work with the PRIS administrator, Softec, to create a "Youth-ITA" in the PRIS system to track specific youth outcomes.

7. Assurance of Posting for Public Comment

DEDC will be posting this waiver for public comment in conjunction with the WIOA State Plan Modification.

WAIVER FOR LOCAL AREAS TO PROVIDE ALL 14 YOUTH PROGRAM ELEMENTS

1. Statutory/Regulatory Requirements to be Waived

The Commonwealth of Puerto Rico is seeking a waiver from the requirements outlined in WIOA sec. 129(c)(2) which requires each local area to make all 14 youth program elements available to eligible youth.

2. Removal of State or Local Barriers

There are no known state-level, local statutory, or regulatory barriers in Puerto Rico related to implementing the requested waiver.

3. Puerto Rico's Strategic Goals

A cornerstone of Puerto Rico's workforce and business engagement strategy is the transformation of Registered Apprenticeship (RA) from a traditional training model into an engine for industrial growth. By leveraging WIOA funds, the DEDC is creating a labor pool tailored for the global reshoring movement.

Under the leadership of Governor González-Colón, apprenticeships are being institutionalized as a standard workforce solution for the Puerto Rican business community. More than $11 million in WIOA 2025 Governor Reserve funds have been strategically deployed to scale RA frameworks across the Island. As of early 2026, DEDC oversees 140 Registered Apprenticeship Programs, with a record-breaking 51 programs established in 2025 alone. Puerto Rico currently supports a robust ecosystem of over 2,200 active apprentices, with 324 graduates recently attaining industry-recognized credentials that serve as a gold standard for technical proficiency. The administration is aggressively diversifying the apprenticeship portfolio to move beyond traditional trades into high-complexity, high-wage technical sectors.

To support youth, DEDC has recently entered into an agreement with the Department of Education and the Restaurant Association (ASORE) in Puerto Rico to establish a pre-apprenticeship program for youth. DEDC has also engaged in a partnership with the Pharmaceutical Industry Association (PIA) to align training programs with the specific technical skills needed for positions in meditech and life sciences. Lastly, DEDC has proactively engaged local and external non-profits such as the Boys & Girls Club and Raices Cyber, for profits such as the Polytechnico, Nuestra Escuela and Casa Grande

While the standard WIOA Youth Program elements (such as alternative secondary school services and postsecondary preparation) provide a necessary academic foundation, they often lack the immediate, tangible connection to the labor market that high-growth industries require.

For Puerto Rico's specific goals of Workforce Reshoring and Talent Readiness, shifting the focus toward Registered Apprenticeships (RAs) and Pre-Apprenticeships offers several distinct advantages not directly available via the Youth Program Elements.

This waiver request supports Puerto Rico's five strategic pillars:

1. Build a Talent-Ready Puerto Rico: Aligning workforce development with long-term economic growth and reshoring opportunities

Traditional elements like postsecondary preparation focus on getting a student *to* the next stage of education. In contrast, Apprenticeships act as an options multiplier. Youth in RAs see the immediate relevance of their classroom learning by applying it in a pharmaceutical lab or an

aerospace hangar. This significantly reduces dropout rates compared to traditional alternative secondary school settings where the connection to a career can feel abstract.

Apprenticeships often lead to both a nationally recognized credential and college credit, effectively achieving the goals of postsecondary transition while the student is already earning a paycheck. Pre-apprenticeship and RA models provide direct skill alignment where the training matches specific machine/software needs of reshoring firms.

2. Establish a Workforce Reshoring Model: PRDEDC launched the Puerto Rico Workforce Reshoring Fund initiative, designed to assess workforce readiness and strengthen talent pipelines for priority industries such as pharmaceutical manufacturing, advanced manufacturing, medical devices, biotechnology, IT and aerospace.

Pre-apprenticeships serve as a feeder for reshoring industries. They provide the basic technical and professional skills needed to pass entry exams for advanced manufacturing, making them more effective than general workforce preparation activities. Work Based Learning programs provide the opportunity for technical immersion since youth would gain cleanroom (manufacturing) or aerospace experience while finishing education.

4. Expanding Apprenticeships & Work-Based Learning: Scaling Apprenticeship and other work-based learning models across priority industries.

WIOA Youth elements that focus on education concurrently with workforce preparation often struggle to keep youth engaged because the workforce component is usually unpaid or simulated. Registered Apprenticeships provide a guaranteed wage progression. For youth in Puerto Rico, this immediate income can be the deciding factor in staying in a program versus entering the informal or low-wage economy.

Pre-apprenticeships serve as a feeder for reshoring industries. They provide the basic technical and professional skills needed to pass entry exams for advanced manufacturing, making them more effective than general workforce preparation activities.

Industry-specific work experiences build a direct relationship between the youth and the employer. This reduces the risk of training for a job that doesn't exist, which can occur in more academic-heavy postsecondary transition activities.

5. Create Sustainable Workforce Financing: Exploring innovative financing models, including a revolving workforce development fund, to ensure long-term sustainability and allow successful training initiatives to be reinvested and expanded.

The transition from preparation to immersion is the key benefit. By prioritizing Pre-Apprenticeships and Registered Apprenticeships, Puerto Rico ensures that its youth are not just preparing for a future career—they are active participants in the island's economic resurgence. This creates a workforce that is not only talent-ready but already talent-deployed. High completion and high wages of apprentices lead to a better pay-back into a revolving fund.

4. Quantifiable Programmatic Outcomes

DEDC would establish a goal of increasing Pre-Apprenticeship, Registered Apprenticeship and Work-Based Learning experiences by 5 percent.

5. Benefiting individuals and groups

The waiver will specifically benefit Youth seeking employment tied to Puerto Rico's in-demand, and higher paying industry sectors. It will also benefit businesses that engage with the workforce system.

6. Monitoring of Waiver Implementation

Puerto Rico's Department of Economic Development & Commerce (DEDC) performance team will monitor the waiver implementation in Puerto Rico:

- DEDC's performance unit will stay abreast of waiver impact and all Youth outcomes. Since Registered Apprenticeship sits under the DEDC umbrella all apprentices will be tracked via the Registered Apprenticeship Partners Information Data System (RAPIDS).

- The Workforce Development Unit will also work with the PRIS administrator, Softec, to create a "Youth-RA" in the PRIS system to track specific youth who participate in RA program.

7. Assurance of Posting for Public Comment

DEDC will be posting this waiver for public comment in conjunction with the WIOA State Plan Modification.

WAIVER TO INCREASE FUNDS AVAILABLE FOR INCUMBENT WORKER TRAINING (IWT)

1. Statutory/Regulatory Requirements to be Waived

The Commonwealth of Puerto Rico is seeking a waiver from the requirements outlined in WIOA Section134(d)(4)(A)(i) and 20 CFR 680.770, which limits a Local Board to using no more than 20 percent of its combined Adult and Dislocated Worker funds for Incumbent Worker Training (IWT).

The Commonwealth requests a waiver to increase the allowable limit for IWT to 35 percent of combined Adult and Dislocated Worker formula funds. This will allow Local Workforce Development Boards (LWDBs) more flexibility to support business retention and worker upskilling in priority sectors.

2. Removal of State or Local Barriers

There are no known state-level, local statutory, or regulatory barriers in Puerto Rico related to implementing the requested waiver.

3. Puerto Rico's Strategic Goals

IWT funds have served as a powerful tool for businesses to both retain their current talent and strengthen the Registered Apprenticeship (RA) pipeline in Puerto Rico. While the Commonwealth leverages On-the-Job Training (OJT) to support the RA model, IWT is specifically designed to upskill existing employees.

IWT serves are part of our business engagement and economic development strategy since IWT funds act as a risk-reduction mechanism that allows business to modernize their workforce without bearing the full financial burden.

This waiver request supports Puerto Rico's strategic pillars:

1. Build a Talent-Ready Puerto Rico: Aligning workforce development with long-term economic growth and reshoring opportunities.

Increasing IWT funding ensures that the talent already in the system remains competitive, preventing layoffs and maintaining a high-skilled labor pool. As companies move operations (like semiconductor or advanced pharma) back to Puerto Rico, IWT funds will allow existing employees to learn the complex new processes required, making the island a more attractive destination for global firms.

2. Establish a Workforce Reshoring Model: PRDEDC launched the Puerto Rico Workforce Reshoring Fund initiative, designed to assess workforce readiness and strengthen talent pipelines for priority industries such as pharmaceutical manufacturing, advanced manufacturing, medical devices, biotechnology, IT and aerospace.

Increased IWT funding allows for deeper assessments of current worker skills. If an aerospace firm needs workers trained in specific composite materials, IWT funds bridge that gap immediately. By subsidizing the cost for companies to train their own staff in advanced manufacturing, the government lowers the entry cost for companies considering reshoring.

3. Expanding Apprenticeships & Work-Based Learning: Scaling Apprenticeship and other work-based learning models across priority industries.

IWT funds are increasingly being used to convert traditional jobs into Registered Apprenticeships in Puerto Rico. Instead of only using apprenticeships for new hires, IWT funds allow a company to place a current junior worker into an apprenticeship to become a journey worker. IWT funding also supports the time senior workers spend mentoring, which is critical for scaling these models in high-complex sectors like Medical Devices and Aerospace.

4. Create Sustainable Workforce Financing: Exploring innovative financing models, including a revolving workforce development fund, to ensure long-term sustainability and allow successful training initiatives to be reinvested and expanded.

By upskilling current workers, we increase their earning potential and tax contributions, which can eventually feed into revolving development funds.

4. Quantifiable Programmatic Outcomes

DEDC would establish a goal of increasing the percentage of workers who earn a recognized industry certification or state license by 5 percent.

5. Benefiting individuals and groups

The waiver will specifically benefit employees who will realize employment retention and increased wages. This waiver will also benefit the business community in Puerto Rico with a higher-skilled labor pool. Finally, this waiver will also and support economic development in the Commonwealth.

6. Monitoring of Waiver Implementation

Puerto Rico's Department of Economic Development & Commerce (DEDC) Workforce Development Unit will work collaboratively with the Registered Apprenticeship to monitor the waiver implementation in Puerto Rico:

- Since Registered Apprenticeship sits under the DEDC umbrella, incumbent workers serving as apprentices will be tracked via the Registered Apprenticeship Partners Information Data System (RAPIDS).

- The Workforce Development Unit will also work with the Performance Team to track the percentage of workers who earn a recognized industry credential as a result of increased IWT funding.

7. Assurance of Posting for Public Comment

DEDC will be posting this waiver for public comment in conjunction with the WIOA State Plan Modification.

Title I-B Assurances

The State Plan must include assurances that:

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

The State Plan must include	Include
procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated	Yes

The State Plan must include	Include
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.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

WAGNER-PEYSER ACT PROGRAM (Employment Service)

(a) Employment Service Staff.

(1) *Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.*

The Puerto Rico Department of Labor and Human Resources (PRDOL) is steadfast in its commitment to providing high-quality labor exchange services under the Wagner-Peyser Act (WP), adhering to recent amendments in regulations. Recognizing the pivotal role of qualified, nonpartisan personnel in ensuring effective service delivery, the Department is strategically leveraging State merit staff employees as the primary workforce for Employment Services (ES).

This strategic decision aligns with the objective of ensuring that labor exchange services are administered by professionals meeting specific and objective qualifications. State merit staff members will undergo comprehensive training to bolster their competence in delivering high-quality services. Furthermore, these professionals will be held to transparent performance standards, contributing significantly to the overall effectiveness and integrity of labor exchange services.

It's worth noting that the PRDOL has embraced the 12 competencies developed by the National Employment Counselor Association as a framework for guiding the delivery of ES services. These competencies serve as a solid foundation for the professional development and training of State merit staff, ensuring their proficiency in addressing the diverse needs of individuals seeking reemployment services.

Moving forward, Employment Services under the Wagner-Peyser Act will primarily be facilitated through merit-based state employees. The PRDOL takes pride in its existing pool of human capital distinguished by excellence in knowledge, leadership, and high-quality management, aligning seamlessly with global trends and sectoral needs. The ongoing objective is to persist in recruiting and training talent endowed with exceptional knowledge and leadership capabilities.

Actively recruiting new personnel under the Workforce Innovation and Opportunity Act (WIOA) is vital for providing mandated services and meeting the overarching responsibilities of the WP. Equally crucial is the continuous training of existing personnel providing direct services to federally designated high-priority populations, such as veterans and eligible spouses, UI applicants with a higher likelihood of exhausting their benefits (including UCX), and other special target populations identified as in need of career services, such as Migrant and Seasonal Farm Workers (MSFW). This involves equipping them with the skills and tools necessary to deliver these services effectively.

Our commitment to continuous education and training extends to our staff, ensuring they stay updated on essential topics for effective case management with clients. We

will persist in providing talent retraining on our island, staying aligned with global trends. This commitment ensures that our personnel remain highly skilled, demonstrating sensitivity and empathy in assisting clients to identify appropriate assistance tailored to their needs. This, in turn, facilitates stable employment and promotes community economic well-being and an enhanced quality of life.

Furthermore, our experienced staff and supervisors continue their training initiatives, actively sharing their knowledge with newly recruited personnel. This aligns with the overarching goal of expanding the knowledge base across all the service programs we offer. Leveraging digital technology, our staff undergoes online training from external entities and other government agencies. This collaborative approach, facilitated through interagency agreements, consistently results in a highly qualified workforce.

(2) *Describe how the State will utilize professional development activities for Employment Service staff to ensure that staff are able to provide high-quality services to both jobseekers and employers.*

In the realm of workforce development, the significance of possessing the latest competencies and knowledge cannot be overstated. The commitment to providing high-quality services to both job seekers and employers is at the core of the State's approach within the Employment Services. Central to this commitment is the recognition that the WP staff plays a pivotal role in the success of the workforce system. As articulated in our strategy, we emphasize the imperative of equipping WP staff with the necessary competencies and skills through diverse and effective approaches.

Skills-based training stands out as a foundational element in our approach. By delivering targeted and effective training, we ensure that staff not only acquire conceptual knowledge but also practices new behaviors and receives valuable feedback on their performance. This ensures a practical understanding of the information and behaviors crucial for delivering high-quality services.

Job assignments are another integral facet of our strategy, providing WP staff with real-world challenges and responsibilities to promote the seamless integration of new ideas

into their existing roles. This hands-on approach enhances adaptability and problem-solving skills.

Building relationships is recognized as a crucial avenue for learning and development. Through interaction with others, WP staff gains insights and perspectives that contribute to their professional growth. The state is committed to investing necessary and eligible funds in consistent, ongoing, and strategic training, aiming to motivate staff and align their efforts with the goals of the workforce system.

Continuous professional development is not merely a pursuit of competence; it is a commitment to excellence. Actively seeking professional development ensures that knowledge and skills remain relevant and up to date, making WP staff more attuned to the ever-changing trends in the workforce system.

The PRDOL has invested time and effort in implementing technological changes by integrating new platforms to enhance its services. In this regard, the PRDOL has adopted the United States government's Executive Order 13985, "Advancing Racial Equity and Support for Underserved Communities through the Federal Government." This order establishes that promoting affirmative equity, civil rights, racial justice, and equal opportunities is the responsibility of the entire country. To address the need for equitable services and equal employment opportunities, funds have been invested in integrating sign language interpretation services through technology.

Furthermore, our commitment to professional development extends to the training of WP staff on the provisions outlined in the Americans with Disabilities Act of 1990. This initiative aims to promote both physical and programmatic accessibility, ensuring that our services are accessible to individuals with disabilities. To support this commitment, eligible funds will be allocated for specialized training, including sign language, with the goal of enhancing our services to the deaf community. This underscores our unwavering dedication to inclusivity.

Additionally, our supervisors undergo real-time training using the ASLS VRI APP online platform. This platform addresses the need to effectively communicate with individuals who are audio-impaired and receiving unemployment insurance, facilitating their access

to employment services. This training equips supervisors with the skills necessary to provide personalized services to the deaf community, enabling seamless connections with individuals through online interpreters and further enhancing our ability to meet the unique needs of this community. Through the PRIS system, statistical data will be collected to identify people with disabilities, providing valuable information to integrate new services tailored to their needs.

Since the inception of the Workforce Innovation and Opportunity Act (WIOA), workforce counseling through American Job Centers has remained a top priority. This collaborative process between WP workforce professionals and job seekers, whether conducted in groups or individual activities, empowers job seekers with insights into the labor market, realistic career perspectives, and adaptive career choices.

The responsibilities of WP staff extend to delivering direct services to high-priority populations, including veterans, eligible spouses, and UI applicants at a higher risk of benefit exhaustion. As the landscape of professional services evolves, our commitment to continuous learning and development ensures that WP staff remains at the forefront of excellence in workforce counseling, contributing to the overall success of the workforce system. To meet this responsibility, WP staff will receive specialized training focused on the minimum competencies required to effectively provide all professional services according to WIOA:

1. Individual Counseling (one to one): Refers to a private session (face to face) between an employment specialist and a job seeker. The main objective is to help the job seeker to explore his current situation regarding the selection or changing job or occupation.
2. Group Counseling: Refers to the process by which an employment specialist uses the principles and techniques of group dynamics and leadership roles in a continuous and meaningful way to help a job seeker who have trouble getting or keeping a job due to work-related attitudes, behaviors, or habits. Usually, these group interventions focus on the discussion of a common theme within the rest of the group.
3. Counseling Skills: Refers to the ability to establish a relationship of trust, open and useful to each client, accurately interpreting the feelings as well as verbal and

nonverbal expressions, and convey that understanding to the client and any other relevant information and necessary assistance. The employment specialist must have the awareness and knowledge of career development theory and the ability to support the job seeker through transitions and facilitate decision-making and goal setting. Must have the ability to recognize the need to refer the job seeker to appropriate resources to eliminate barriers to employment and the ability to obtaining (intake) the necessary and effective information to ensure that the job seeker is fit and able to benefit from the programs available in within the One-Stop Centers.

4. Individual and Group Skills Assessment: Refers to the ability to provide a continuous assessment using individual skills and group evaluation and use of formal and informal assessment methods that comply with the regulations of the Equal Employment Opportunity Commission (EEOC); the ability to provide continuous assessment, individual and group settings, involving the assessment and measurement of customer needs, characteristics, potential, individual differences and self-evaluation; and the ability to recognize the needs and special features of all kinds, for example, minorities, women seeking non-traditional and culturally different occupations, immigrants, the disabled, older workers and people with AIDS.
5. Market Information Utilization: Refers to the ability to access, understand and interpret the labor market information and job market trends; the ability to develop and use educational, occupational, and labor market information to help job seekers in their decision-making process and the formulation of employment and career objectives that lead to self-sufficiency; and the ability to develop and use skills standards.
6. Computer Skills: Refers to the ability to apply the principles of employment counseling to the use of the Internet and other online services, including but not limited to testing, job banks (PR.JOBS), job search, preparing and distributing resumes, reports, case management, counseling and maintaining confidentiality of customer data.
7. Individual Employment Plan and Case Management: Refers to the ability to help job seekers to develop and implement an appropriate individual employability plan to help them move from their current situation through any necessary service to improve their

employability, including training and supporting services into a suitable job. It involves the knowledge of educational resources and training, sources for financial support, community resources and requirements of the local labor market; and the ability to manage cases through placement and retention.

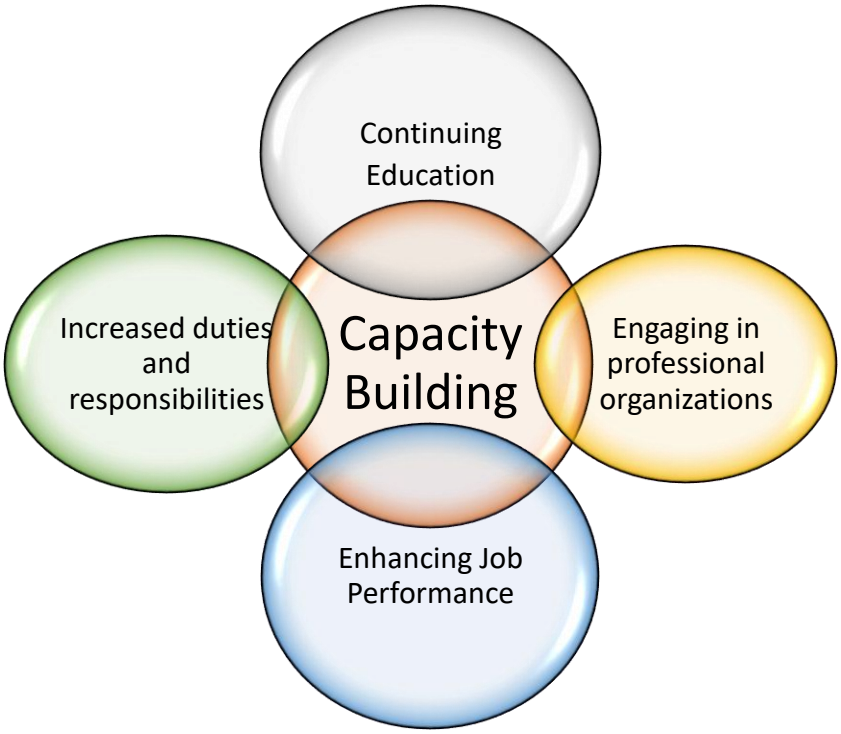
8. Placement Skills: Refers to the ability to identify and communicate an understanding of employers staffing needs to develop effective job development contacts and help the job seeker to present his/her qualifications in relation to the employer's needs; the ability to teach job search skills and for job development; the ability to help the job seeker in making decisions related to the work environment in which he/she could be more successful; and the ability to advocate for employment and career development of special target groups.
9. Community Relations Skills: Refers to the ability to help job seekers to get the services needed to address their employment barriers that may interfere with the successful employment and their career goals; the ability to make presentations to community groups and to participate in the working teams of such community groups; the ability to develop information packages; and the ability to associate and establish staff resources with other agencies within the One-Stop Centers.
10. Workload Management and Inter-Personal Relationship Skills: Refers to the ability to coordinate all aspects of the Employment Counseling Program as part of a team effort, resulting in a continuous and significant sequence of client services, agency staff, employers, and the community; and the ability to operate a comprehensive employment resource center.
11. Professional Development Skills: Refers to the ability to develop skills on an individual basis and within the position or profession and demonstrate by example the performance and standards expected of a professional Employment Specialist.
12. Ethical and Legal Aspects: Refers to the ability to meet ethical standards, knowledge of regulations and legislation affecting training and employment, employment services and social reform, such as the EEOC, the Americans with Disabilities Act, professional testing standards, Multicultural Affairs, Family Affairs and one Stop Centers.

Our goal is to have a comprehensive curriculum aligned with these competencies to equip staff with the necessary tools to provide high-quality services to both job seekers and employers. This includes intensive interview techniques, professional assessment administration, labor market information access and interpretation, personalized service strategies, identification of interpersonal skills training needs, partnership development with the workforce, and awareness of available support services.

Additionally, ongoing staff development activities may include:

a. Comprehensive online resources on the Employment Service's Intranet using MS SharePoint.
b. Comprehensive training on external online resources such as mynextstep.org and myskillsmyfuture.org.
c. On-the-job training for new staff in state and local offices.
d. Continuous assessment of training needs by local Employment Service Managers and partners.
e. Participation in Local Boards to stay informed about local, state, and national issues.

Our commitment is to continue training our staff, providing them with the necessary competencies and skills for professional service delivery, integrating advanced technology in education with digital tools that foster online learning. This involves:



1. **Continuing Education:** Offering In-person and virtual courses and workshops, certificates, accreditations, or other credentials through educational programs.
2. **Engaging in Professional Organizations:** Attending local, regional, national, and international meetings, conferences, and workshops sponsored by professional organizations; serving as an official, board member, or committee member; coordinating events sponsored by the Employment Service and/or the American Job Center.
3. **Enhancing Job Performance:** Receiving innovative training on new technological platforms, systems, and processes.
4. **Increased Duties and Responsibilities:** Taking on new challenges in the current position, short and long-term assignments.

The staff at American Job Centers under the Workforce Innovation and Opportunity Act (WIOA) plays a pivotal role in supporting job seekers, and their effectiveness is crucial to the success of WIOA. To enhance the professional services provided, we have actively sought input from the WP staff through feedback mechanisms such as focus groups. This cooperative approach guarantees that the knowledge and

experiences of the staff are effectively captured and disseminated through comprehensive training programs.

The feedback received has been instrumental in identifying key areas for inclusion in staff training. These encompass a range of topics essential for professional development, including HR practices, general skills, and supervisor-specific subjects. Noteworthy among the suggested topics are:

- Discrimination in Employment
- Diversity and Human Relations in the Workplace
- Documentation and Confidentiality: The Healthy Management of Information
- Empowerment and Development of a High-Performance Work Team
- Conversational English (Basic, Intermediate, and Advanced Levels)
- Conflict Mediation: Essential Tools for Today's Supervisor
- Results-Oriented Work Plans
- Strategic Planning in Public Relations

To facilitate the delivery of these training modules, we are establishing collaboration agreements with other government agencies that offer educational courses. The interagency training approach ensures a comprehensive and diverse learning experience for the WP staff, fostering continuous improvement and professional growth.

In summary, the proactive integration of staff insights and the incorporation of a wide array of relevant topics in training programs underscore our commitment to providing high-quality professional services to job seekers under WIOA. Through collaboration and ongoing learning, we aim to equip our staff with the knowledge and skills necessary for success in their roles.

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

In order to provide supportive guidance to the staff of the Employment Service Division, the Unemployment Insurance (UI) Division, responsible for administering the Federal Unemployment Insurance Program (UI), and the Operators of the American Job Centers, for the implementation of the provisions of the Workforce Innovation Opportunity Act of 2014 (WIOA) regarding UI Programs, a system has been integrated to share training with all personnel from various programs aligned to assist individuals in job search, access employment, education, training services, and support services to succeed in the labor market and to align employers with skilled workers needed to compete in the global economy.

Cross Training: The UI provides training, technical assistance, and support to all personnel from key partners serving job seekers and local employers to ensure that program partners are highly engaged in local and state workforce partnerships that allow for constant exchange of information on core programs, UI legislation, and available programs. This integration is designed to flow seamlessly within the One-Stop Centers.

Leveraging virtual platforms, training webinars have been integrated for staff with outstanding academic qualifications and extensive experience, qualifying them as internal educators who will continue to provide ongoing education to merit staff. These training sessions will be recorded and shared across each service program to keep staff updated with new information.

Our commitment is to continue providing cross-training on WP services to veterans, UI applicants, MSFW, and general job seekers. Additionally, training integration will cover areas such as the WP Complaint System, Agricultural Recruitment System (ARS), the refocusing of State Jobs for Veterans Grants (JVSG), and its impact on service delivery by WIOA partners, Reemployment Services, and Eligibility Assessment Program (RESEA), UI policies, rules, procedures, screening, and resolution of UI eligibility issues.

Identification of Unemployment Insurance (UI) Eligibility Issues: To meet the requirement of providing necessary information related to UI eligibility, the Employment Service Division coordinates with the Unemployment Insurance Division to ensure that:

1. An effective feedback system is in place to notify UI staff if the claimant reported as indicated, and participated in eligibility assessment and/or services, as applicable;
2. The feedback system is established for all reemployment services the UI claimant is required to participate in, including a process to refer any eligibility issues identified during the eligibility review to a UI adjudicator.
3. Employment Service staff are properly trained to conduct a comprehensive eligibility assessment and identify potential eligibility issues, referring them to a UI adjudicator;
4. Employment Service staff are adequately trained to document information for use by UI staff to adjudicate any UI eligibility issues, as applicable;
5. Only merit-based UI staff have the authority to resolve UI eligibility issues.

In accordance with the grant requirements for the Reemployment Services and Eligibility Assessment (RESEA) Program, a comprehensive review of UI eligibility is conducted under the Eligibility Review Program (ERP). Section 303(a)(1) of the Social Security Act (SSA) requires "methods of management... as the United States Secretary of Labor determines are reasonably calculated to ensure full payment of unemployment compensation when due." This necessitates the implementation of procedures and policies for UI eligibility information by ES and/or WIOA staff to promptly identify UI eligibility issues and refer them to UI staff for proper adjudication according to state UI law.

To ensure ES meets the needs of UI, there are policies and procedures to define and timely provide required information related to the participation or availability requirements of a claimant. UI applicants referred to RESEA will be subject to this

eligibility review as part of their participation in RESEA. However, all UI applicants not referred to RESEA and receiving employment services will be subject to the same eligibility review by WP staff as part of the initial assessment. These services will be provided by merit-based WP state staff. WP/RESEA staff will review WP/RESEA participants who have completed assessment interviews and refer them to UI for adjudication, as appropriate.

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

Consistent with the Employment Service policies and procedures which require an integrated approach to its reemployment strategy to strategically coordinate resources and activities serving the unemployed community, policies and procedures are in place to address the provision of services to UI claimants regarding assistance to individuals filing a claim for UI through the American Job Centers.

This operational guide established the guidelines, policies, and procedures to be followed by the WP and UI staff (responsible for the administration of the Federal Unemployment Insurance Program (UI)), in the implementation of the provisions of the Workforce Innovation Opportunity Act of 2014 (WIOA) with relation to UI Programs, and to:

Recommend the Division of Unemployment Insurance to continue working with other partners in the Workforce System, in the development and implementation of strategies that support WIOA's vision, as described in the Training and Employment Guidance Letter (TEGL) 19-14.

Urge the Division of Unemployment Insurance and the Division of Employment Service to coordinate with State Boards and Local Boards on how best to most efficiently use UI programs including the Reemployment Services and Eligibility

Assessment (RESEA), as they develop integrated strategies for service delivery through American Job Centers under WIOA.

Career Services under WIOA Include the Provision of "Information and Assistance" in Connection with the Filing of a UI Claim.

The integrated workforce system established by WIOA is intended to provide participants with a unique and comprehensive experience that includes a professional level of service provided in a timely manner. WIOA requires, as part of its career services, the provision of information and assistance to individuals in connection with the filing of a UI claim (WIOA Section 134(c)(2)(A)(x)), WIOA 20 CFR 678.430(a)(10)).

To provide this access and the meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through the One-Stop Centers, assistance will be available through:

- UI orientation provided to every new claimant explaining the full range of workforce services available to help them return to work by Wagner-Peyser merit staff and/or duly trained WIOA staff.
- Online access via https://desempleo.trabajo.pr.gov/reclamantes/ where customers can file electronically from career centers, home, libraries, or any other Internet portal.
- Fully staffed resource centers at all career centers, including Internet access, copies, phones, fax, and resource libraries as permitted due to COVID-19 pandemic.
- Access points at One-Stop Centers and career centers across the State.
- An opportunity for each claimant to access in-person reemployment services as they come to career centers and One-Stop Centers to complete the UI filing process.

- Access to professional and experienced staff for the preparation of resumes, registration in ES as a requirement for claimants and job matching services.
- The availability of staff, technology, and written materials in a variety of languages to meet the needs of all customers.
- Fully accessible services, online and in person, to serve any customer with a disability.
- Joint participation of UI staff with other workforce partners in large layoff events.
- Daily referrals of customers from workforce partners to UI specialists to ensure that customers have access to all benefits to which they are entitled.

People who directly seek career services from the One-Stop Career System should receive services beyond what they could get on their own using self-service tools, such as public Internet portals and telephone services. The goal is for individuals to be able to receive more robust or "meaningful" staff-assisted services, as needed.

As set forth in 20 CFR 678.305(d), access to each partner's programs and services means:

- Have a representative of this program physically present in the American Job Centers.
- Have a representative of a different partner program, physically present at the American Job Center properly trained to provide information to clients about the programs, services, and activities available through all partner programs; or
- Have a direct link available, using technology, to a representative of a partner program who can provide meaningful information or services.

The methods or means of providing access to the different partner programs are contained in the Memorandum of Understanding (MOU). These have been coordinated with the Local Boards and the Operators of the One-Stop Career System.

In the context of aiding Ul's claimants, "significant assistance" means having staff in the American Job Centers properly trained in the filing of a Ul claim, and in the rights and responsibilities of the claimants. Employment Service staff is responsible for providing the necessary assistance in filing Ul's claims, if requested, or if the individual is identified as needing the service due to barriers such as limited Spanish proficiency, disabilities, or other barriers. The staff who provide this assistance may come from UI, Wagner-Peyser, or other AJC staff who have been duly trained to aid and service in the taking of claims thus facilitating the daily acceptance of information. Costs associated with providing this information and assistance to individuals filing Ul claims may be met with administrative funds from Ul's grant under Title III of the Social Security Act or through a combination of funds from other programs that are consistent with the language authorizing such programs and Federal cost principles.

The provision of meaningful information or services is carried out using technology or direct liaison to an appropriate representative of a partner program. As described in 20 CFR 678.305(d)(3)(i), a "direct link" means providing a direct connection at an American Job Center within a reasonable time, by telephone, or through real-time Internet communication, with a representative of a partner program who may provide program information or services to the customer.

The level and timeliness of the remote service is comparable to the assistance the person would receive if staff were assisting such an individual in person at the AJC. This means that, if an individual in an AJC is directed to a telephone for assistance regarding an Ul claim, there must be a dedicated telephone line to serve the customer in a timely manner (20 CFR 20 CFR 678.305(d)(3)(i)). Individuals should not simply be directed to a general information line or dial-up line with UI Call Center, where the individual is placed on hold along with all other claimants who have called for service. Providing only a telephone number, link to a web page, information, pamphlets, or other resources and materials does not constitute a "direct link" (20 CFR 20 CFR 678.305(d)(3)(i))). ES must ensure that, if assistance is

provided remotely using technology, it should be one that allows trained staff to aid in a timely manner.

It is important to emphasize that UI eligibility determinations must be made by UI merit staff who is responsible for carrying out this activity. As set out in UIPL 12-01, Outsourcing of Unemployment Compensation Administrative Functions, and explained in more detail in UIPL 12-01, Change 1, Outsourcing Unemployment Compensation Administrative Functions – Claim Taking, only merit staff (state employee) will ask, either in person at the AJC, or remotely, answer questions, provide advice or make decisions that may affect Ul eligibility of claimants. For example, for assistance in completing a UI claim, only UI merit staff may provide specific advice to the individual, including an indication of the possible effects on UI eligibility based on the individual's specific circumstances or actions. And, in relation to services to claimants, only UI merit staff can adjudicate UI issues that may arise and that may include the search for data by all parties (partners).

Some of the areas of opportunity that have been implemented to improve the integration of Ul into the Single Management System include, but are not limited to:

- Access by Ul claimants to the full range of services available at the AJCs.
- Referral of UI claimants to reemployment services through the Worker Profiling and Reemployment Services (WPRS) and/or the Reemployment Services and Eligibility Assessment Programa (RESEA).
- Ensure that claimants meet eligibility requirements (such as, job search, register with the Employment Service as provided by state law, participate in reemployment services as required under the RESEA and WPRS programs), and ensure that there is a feedback loop to provide Ul Program staff with information about any potential eligibility issues.
- Ensure that claimants are fully notified of the deadlines and eligibility requirements associated with TRA, the Alternative Trade Adjustment Assistance (ATAA) Program, and the Reemployment Trade Adjustment

Assistance (RTAA) Programs, and that communication with the case managers of TAA participants is an enabler.

- Coordination with the Rapid Response teams to provide services to employers and workers in situations of mass dismissal and carry out activities to file a UI claim to receive UI compensation benefits.

(5) Describe the State's strategy for providing re-employment assistance to UI claimants and other unemployed individuals.

Reemployment Services to UI Claimants

In March 2023, the Puerto Rico Department of Labor and Human Resources (PRDOLHR) contracted with The Policy & Research Group (PRG) to conduct an impact and lessons-learned evaluation of its Reemployment Services and Eligibility Assessment (RESEA) program. The goal of this effort is to ensure that PRDOLHR meets the U.S. Department of Labor's (DOL) tiered-evidence requirements for RESEA, while contributing to the evidence base on reemployment strategies.

Since 2010, PRDOLHR has operated the Reemployment Eligibility and Assessment (REA) program and its successor, the RESEA program. RESEA "remain a high priority" for DOL because there is "strong evidence that these types of reemployment programs and service delivery strategies are effective."

On February 9, 2018, amendments to the Social Security Act permanently authorized the RESEA program. The program is guided by four goals:

(1) To improve employment outcomes of Unemployment Compensation (UC) recipients and to reduce the average duration of UC receipt through employment.
(2) To strengthen program integrity and reduce improper UC payments through the detection and prevention of such payments to ineligible individuals.
(3) To promote alignment with the broader vision of the Workforce Innovation and Opportunity Act (WIOA) of increased program integration and service delivery for job seekers, including UC claimants.

(4) To establish reemployment services and eligibility assessment as an entry point for claimants into other workforce system partner programs.

The foundational element of the RESEA program is an in-person orientation and one-on-one meeting (initial RESEA) between the claimant and a RESEA/Wagner-Peyser (WP) merit staff. The following core components are required by RESEA:

(5) A UC eligibility review.
(6) Provision of customized labor market and career information.
(7) Co-enrollment in the Wagner-Peyser Act-funded Employment Service program.
(8) Support with an Individual Reemployment Plan.
(9) Referrals and information provided for additional reemployment services and other AJC services, resources, and trainings, as appropriate.

Primarily, RESEA activities are individual one-on-one appointments between the claimant and an RESEA career specialist. In Puerto Rico, all claimants are assigned to in-person services at an AJC serving the municipality in which they live. PRDOLHR allows claimants to participate virtually, however, on a case by-case basis. This may involve meetings over Microsoft Teams, over the phone, or other virtual platforms deemed appropriate for the case. Although we have the flexibility to provide Reemployment services virtually, the priority is to provide services in person.

By providing comprehensive reemployment services that are targeted to priority populations, specifically those most likely to exhaust their UI benefits, the goal of the RESEA program in Puerto Rico is to increase employment, retention, and earnings of unemployment benefit recipients, and in doing so, improve the quality of the workforce to sustain economic growth and enhance productivity and competitiveness.

All RESEA participants attend an orientation during their initial RESEA visit. Orientations are conducted weekly at all AJCs that have RESEA service capacity. In most cases the orientation is an individual session, though local staff have the flexibility to schedule a

group orientation if preferred. During the orientation presentation, claimants are introduced to the RESEA program. They are further provided with an overview of services available at the AJC and re-employment services available through Wagner Peyser and other partner programs. Claimants are also informed during orientation of the requirements for RESEA participation and of the adverse effects on their eligibility to continue receiving UI benefits if they do not fulfill these requirements. These include the requirement for the number of RESEA meetings required. The orientation is followed by the initial RESEA one-on-one appointment.

All UI claimants referred to by RESEA must attend an initial RESEA appointment. During the initial RESEA, claimants undergo an unemployment benefits eligibility assessment, complete an initial evaluation with RESEA career coaches, create an Individual Reemployment Plan, and receive referrals to additional reemployment services as needed. In Table 1, we provide details of the initial RESEA content.

Subsequent RESEA sessions are provided if recommended by the RESEA coordinator. In practice, however, all claimants are scheduled for subsequent sessions if they are not reemployed by the time, he/she is scheduled for a subsequent .26 There are no limits on the number of subsequent sessions that can be provided under the current RESEA program. Each subsequent session includes an eligibility review, review of the claimant's job search activities, and any additional reemployment services offered in the local area.

Table ___. *Initial RESEA Overview27*

Topic	Content
Unemployment Benefits Eligibility Assessment	At each RESEA meeting, the RESEA representative conducts an eligibility review. The eligibility review is completed in a one-on-one setting by the RESEA representative using Microsoft Forms or on the identical paper form. The claimant's responses are recorded and then examined by

	RESEA staff, who determine if there are concerns that should be referred to the UI adjudications section for investigation. UI claimants in Puerto Rico are required to make at least three contacts per week with employers to demonstrate that they are actively searching for a job. The claimant is responsible for keeping a record of their job search activities and presenting this information during the eligibility assessment. If the claimant fails to present evidence of their job search efforts, the RESEA coordinator will notify the UI adjudications unit. The consequences of not meeting the job search requirement may include a temporary stop in UI payments or total disqualification of UI benefits.
RESEA Initial Evaluation	The initial RESEA evaluation focuses on reemployment services. The first step of the evaluation process includes an initial assessment to determine if the claimant is job ready using various assessment tools including the Self-Assessment Form, the Job Search Skills Assessment Form, and the Job Search Activity Log Form. The claimant reviews completed forms with an RESEA representative and/or career counselor alongside a review of the claimant's employment history and educational level to determine their job prospects. As part of this step, the RESEA representative provides the claimant with LMI to assist in their job search. The evaluation process may also include the use of tools such as MiProximoPaso.org and MySkillsMyFuture.org, which are free and available to claimants at all AJCs through the Resource Center or online from their mobile devices, tablets, and computers.

	Following this step, an RESEA occupational counselor conducts a deeper review of the claimant's skills, knowledge, and abilities to identify the minimum acceptable skills necessary for the claimant to improve their chances of reemployment. These two reviews serve as the basis for preparing the PIR.
Development of Individual Reemployment Plan (*Plan Individual de Reempleo* – PIR)	A RESEA representative works with each claimant to help them to create a PIR. The PIR contains specific steps, agreed upon between the claimant and the representative, that have been determined to be most appropriate to achieve their reemployment. The cooperative creation of a PIR focuses on the claimant's unique goals, relevant experience, and barriers to employment.28 The PIR includes reemployment services and job search activities (e.g., resume workshop, interview skills training) that the claimant should undertake, and any AJC services, approved training program, or other referrals that may benefit them. Scheduled reemployment services must be documented in the PIR, as well as details to reflect which party (i.e., claimant or staff) is responsible for each action. During development of the PIR, the claimant receives LMI specific to their individual skills and interests to assist in planning their job search activities. Staff review the PIR Responsibility Statement with the participant to clarify program responsibilities, and each party signs the document. A copy of the PIR is provided to the claimant for implementation, and any proposed changes to the plan are

	made jointly with the claimant and documented in the plan.
Referrals to Reemployment Services	As needed, claimants are referred to reemployment services. Each reemployment service provided must be electronically documented in the Participant Record Information System (PRIS) in accordance with the policies and procedures established in the Puerto Rico Servicio de Empleo 4-14, Protocol for Referral to Career Services. The RESEA representative, Wagner-Peyser staff, AJC staff, or other WIOA partners may offer any number of career services to claimants; these services are authorized under the WIOA Act of 2014. The RESEA representative reminds the claimant that they may be subject to disqualification of their benefits if they do not attend any reemployment services to which they are referred.

Reemployment Services to Other Unemployed Individuals

Wagner-Peyser, along with other partner's staff, is responsible for the provision of comprehensive employment and placement services to jobseekers who are most in need and face multiple barriers to reemployment. This employment and placement services are available to job seekers thorough the American Job Centers on a customer–centric approach for the deliverance of services, aligned with WIOA, for providing reemployment assistance to UI claimants and other unemployed individuals (job seekers) as long they are eligible to work in the United States including, but not limited to:

- Providing the job seeker, not only job search assistance, but information on the AJC services.

- Encouraging job seekers to attend an AJC orientation and refer them to subsequent services, as appropriate.
- Detailed labor market information related to growth occupations and industries, and wage surveys to assist with decision making in the selection of a better career opportunity or looking for a new job.
- An orientation about the services available through the AJC with emphasis on access to information available on the labor market and careers, delivery of labor market information unique to the experience, skills, and desired occupation of the claimant.
- Assistance in the use of basic services available and self-help offered within the AJC through the use resources room or virtually (Internet).
- An initial assessment of skills relative to available jobs preferably with an Employment Counselor to identify strengths, weaknesses and barriers after the claimant receives the initial orientation by the ES/RESEA staff.
- Referrals to appropriate services offered by other partners within the AJC such as self-assessment, information on education and training, interviewing techniques, networking, occupational exploration, and online resources, among other services.
- Development of an Individual Reemployment Plan which should include job search activities, appropriate topics such as preparing resumes and strategies workshops, job search and/or authorized training.
- Workshops on effective job search.
- Interviewing techniques and resume development.
- An overview of multiple self-service employment resources.
- Direct referrals to job training, educational and supportive service opportunities in the community.

The provision of reemployment services is of high relevance during recessions and high unemployment periods. As a result, Wagner-Peyser will continue focusing its attention and resources to continue better integration and service connection with the services provided through the AJCs under WIOA. The goal is to ensure that jobseekers have access to the full range of employment services and training through the AJCs. Most of the employment and

placement services are done through staff assisted services. Nevertheless, jobseekers have access to the whole range of services provided by the AJCs such as self-assisted services, group presentation and customized one-on-one assistance. Jobseekers who need more specialized services according to their needs (e.g., veterans, migrant and seasonal farmworkers, UI claimants) receive more in-depth career services to further their career goals through the respective programs.

(6) Describe how the State will use Wagner-Peyser Act funds to support UI claimants and the communication between the Employment Service and UI, as appropriate, including the following:

a. Coordination and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act

The PRDOLHR administers the WP Labor Exchange System. During PY22, the Puerto Rico Department of Labor and Human Resources implemented several initiatives and strategies utilizing the 10% Wagner-Peyser governor's reserve. Notably, one of these initiatives is Proyecto Infinito.

The Infinite Talent program was initiated by the Department of Labor and Human Resources in May 2023 with the aim of enhancing the employability of individuals with functional diversity in Puerto Rico. The program comprises various components:

a. Talent Education Program

The Infinite Talents program was tailored to the specific needs of its registered members, providing them with the essential employability skills required to succeed in the job market. The program covered a range of topics, including Growth Mindset, Resume & LinkedIn Preparation, Basic Knowledge of My Rights, Managing Anxiety and My Emotions, Job Interviews & Job Search Tools, and Assertive Communication.

b. Service Provider Education Program

Education service providers were certified to create a sustainable employability ecosystem for talent. It is crucial for them to understand the labor market's needs, job offers, and employers' requirements. The program covered various topics, including the most in-demand technical and essential skills, the latest trends in resumes, interviews, and job search platforms, as well as training on the exclusive Radiography Talento Infinito tool, which aims to align talent effectively with the demanded positions in the labor market.

c. Employer Education Program

As part of the program, participating companies were certified as Inclusive Companies of Infinite Talent. The programmer covered legal aspects of employability in infinite talent, recruiting infinite talent, and integrating infinite talent.

d. Infinite Talent Integrated Services Center

The Infinito Talent Service Center is responsible for coordinating and facilitating various services for talent, companies, and educational service providers. These services include x-rays, resume creation or revision, interview internships, career coaching, professional photography, job search assistance, and job application support, among others.

In addition, by 2024, the PRDOLHR will implement a new leading technology based on AI to improve the lives and careers of its citizens known as PR Workforce Exchange. Through this partnership, Puerto Rico will be able to create family-sustaining career opportunities for jobseekers and connect employers to the skillsets they need to thrive.

The platform may allow jobseekers to register onto the platform and create their resume online thought www.perfil.trabajo.pr.gov.

With this leading technology:

- Employers will have faster access to qualified candidates: Easily source with high quality candidate pipelines, deep understanding of candidates' skills and broad outreach through campaigns and access to diverse talent.
- Job seekers have a consumer-like self-service experience: Career planner, recommended jobs, personalized resumes, mentoring, and mobile device support.
- Matching talent at scale with AI: Match candidates to specialized training and career development opportunities. Build faster time to value as a strategic service provider.
- Centralized marketplace for employers and job seekers: Manage employers, job posting and job seeker application workflows in one centralized marketplace.

From a job seeker's point of view, the platform provides the ability to:

- Make Job Searches a Thing of the Past: Explainable AI-matching empowers candidates to discover the best fit roles for them.
- Intelligently Personalize Engagement: Tailor messages over the channel of their choice, all for specific candidates or an entire talent pool.
- Reduce Hiring Friction: Use intelligence and automation throughout the entire hiring process to keep candidates engaged.

From an employer's perspective, the platform provides the ability to:

- Access top candidates matched by AI: See high quality pipeline of candidates coming to the employer through AI matching.
- Interact with Job Seekers: Contact Job Seekers through email, invite the best ones to apply, and manage the best prospects efficiently.

- Calibrate positions to fine tune AI: Define the skills, experience, ideal candidates, and target companies for your positions.

The platform is Internet based therefore job seekers may access it through AJCs resource centers where job seekers can conduct job search and resume creation activities by using resources such as computers and phones, respond to employment opportunities. In addition to self-service options, claimants can also receive staff-assisted services, such as job search workshops, assistance with access and navigating the new platform, individualized labor market information, referral to veteran services, and referral to education, training, and supportive services, including Federal electronic tools such as MyNextMove and MySkillsMyFuture and use of fax and copier machines, telephone, resume writing and development, career exploration, among other services. These services are available to all job seekers including UI claimants. Both UI and WP program representatives are party to the MOU with other local area partners to identify the service delivery. The PRDOLHR programs, including UI, are committed to their roles as partners within the AJCs and consistently collaborate internally and with the local areas to further support the spirit of WIOA. These two partners are also coordinating internally within the PRDOLHR as this agency administers both programs.

In summary, PRDOLHR will use WP funding to support the reemployment and related services to UI claimants. ES continues providing labor exchange services as required by 20 CFR 652.3

e. Registration of UI claimants with the State's employment service if required by State law.

UI claimants are mandated by state law to register with the employment service (WP) as a prerequisite for eligibility to receive UI compensation. After filing their UI claim

online, claimants must visit the nearest career center to complete their registration with WP.

Beginning around the end of the first quarter in 2024, the new UI platform system, Geographic Unemployment System (GUS), will initiate a request to the WIOA State Management Information System (PRIS). This request aims to verify if a claimant is registered within the system as a WP participant, as mandated by law. GUS will transmit a daily file to PRIS containing information about all claimants in the system.

Subsequently, PRIS will respond to GUS, confirming whether the listed claimants are registered WP participants. Claimants reported as not registered will experience a suspension of their UI benefits until PRIS verifies their WP registration status.

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

UI claimants in Puerto Rico receiving UI benefits must be able and available to work as required by law and be actively seeking full-time work. Amendments to the UI law in Puerto Rico in 2012, established that if an individual earned most wages in the base period used to establish the claim from part-time work, the individual would be allowed to restrict their work search part-time and can reject a full-time job offer. The only exceptions to the work search requirements in Puerto Rico are for the following:

- Individuals with a job attachment, which would include individuals for whom their employer has filed a “partial” unemployment claim for them or those individuals with a definite recall to work (the law does not establish a predetermined period to return to work).
- Union members in good standing.
- Individuals who are approved and enrolled in an approved training program by the Director of the Bureau of Employment Security.

The primary work test is done through the UI benefit certification Form 566, which includes a question about whether the individuals can be available and actively seeking employment. A negative response places an issue on the certification, which cannot be removed until a statement is obtained regarding availability. If an issue is determined, a benefits eligibility review is performed by the UI benefits interview specialist or claims examiner and a determination released, if in order. During the initial claims filing application, individuals are asked questions regarding their availability. Negative responses require adjudication of the potential availability issue by a UI claim examiner or service specialist.

Administration of the work test is also performed through the RESEA. During the in-person appointments, a UI eligibility review is performed, and the RESEA staff interview the claimant about been able and available for work and any barriers to employment they may be facing. During this work test staff review the individual's work search, discuss the individual's availability, and any barriers to work. WP Placement Officer staff have regular contact with employers and receive notice when individuals fail to report to an interview or refuse work – resulting in an issue on the individual's claim. This can include employers reporting individuals who do not report for interviews, individuals who are incarcerated, or are otherwise not able, available, and/or actively seeking work. In the event a potential issue is discovered from any source, an unemployment benefits interview is scheduled with a claim examiner. If the individual is not able, available, and actively seeking work (and is not exempted from work search), an appropriate determination regarding UI benefits is released.

The other work test is done through WP at the one-stop-centers. If a UI claimant walk-in into an AJC for employment and/or placement services, WP staff will perform the work test and contact the UI adjudication unit when they become aware of UI claimant's refusal of suitable employment or failure to attend scheduled interviews.

g. Provision of referrals to and application assistance for training and education programs and resources.

The integration of WP within the American Job Centers in Puerto Rico allows for the orderly provision of services to job seekers and the provision of referral to and application assistance for training, educational programs, and resources. It is of utmost importance for WP to coordinate the integration of these services, which is the primary goal of WIOA. This brings together the core programs to provide the whole range of services seamlessly and coordinated to individuals seeking services at the career centers, providing information to job seekers on community resources, labor market information, General Educational Development Test (GED), occupational training, OJT, and support services that make training possible to enhance an individual's ability to return to work. The network functions as the "front door" to the workforce system. WP staff from roles are inserted in the workflow with the responsibility of identifying job seekers' needs and assisting them with UI, employment and reemployment assistance, trade services, automated resources, workshops, and referrals to more intensive services, such as training, which are provided by WIOA through local boards and other partners.

RESEA participants are referred to the Dislocated Workers program for eligibility and leverage of resources for services not provided by WP. This will serve as an access point to inform UI customers about other WIOA Title I-B and other partner programs and services. This collaborative partnership facilitates a streamlined referral process for UI customers to WIOA programs and services within the AJC system.

a. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of the WIOA. The AOP must include an assessment of the needs.

   The Agricultural Outreach Plan (AOP) is a crucial component mandated under the Workforce Innovation and Opportunity Act (WIOA) for each State agency, requiring a comprehensive update every four years as part of the Unified State Plan outlined in sections 102 or 103 of WIOA. The primary objective of the AOP is to conduct a needs assessment.

In alignment with the amendments introduced by WIOA, the Puerto Rico Department of Labor and Human Resources (PRDOLHR) assumes responsibility for delivering services to Migrant and Seasonal Farmworkers (MSFW) in a manner that is both qualitatively equivalent and quantitatively proportionate to services offered to non-MSFWs. Recognizing the considerable challenges faced by MSFWs in achieving basic educational goals and securing sustainable employment, the PRDOLHR addresses impediments such as transportation issues, language barriers, and workplace hazards.

Efforts are directed at overcoming these challenges, with the PRDOLHR ensuring transportation for MSFWs through their employers. A range of services, including job search assistance, counseling, testing, and referral services, along with various training programs available under WIOA and the National Farmworker Jobs Program (NFJP), is extended to all MSFWs. Outreach activities involve in-site visits to MSFWs, offering orientation and counseling services. To mitigate exposure to workplace hazards, the PRDOLHR employs a housing checklist compliant with safety and security regulations.

According to WP regulations (20 CFR 653.107), an Agricultural Annual Outreach Plan (AOP) must be submitted annually. As part of the Unified State Plan mandated by WIOA, the AOP for Program Year (PY) 2024 is included, outlining strategies for serving domestic MSFWs and H-2A foreign guest workers not reached by standard intake activities. This plan spans from July 1, 2024, to June 30, 2027.

The WP Act, amended by WIOA, emphasizes that the full spectrum of employment and training services for the agricultural community, encompassing both MSFWs and agricultural employers, must be provided within the One-Stop Centers network. This commitment ensures equitable access to a comprehensive array of services for MSFWs, aligning with the Charles R. Richey Order of 1973 addressing civil rights violations against MSFWs.

Puerto Rico holds historical significance as a designated MSFW State, reflecting the highest number of MSFW participants in the WP program, as reported in the Wagner-Peyser (WP) Annual Performance Report, ETA-9173 4QTR report.

i. Assessment of Need. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activities in the State. Such needs may include, but are not limited to, Employment, Training, and Housing.

The Agricultural Outreach Plan (AOP) mandates a comprehensive assessment of the distinct requirements of farmworkers in the region, grounded in historical and anticipated agricultural and farmworker activities within the State. These needs encompass, but are not confined to, aspects such as employment, training, and housing.

The AOP is geared towards scrutinizing the specific needs of farmworkers for the 2023-2027 Workforce Innovation and Opportunity Act (WIOA) State Unified Plan. It delineates activities designed to furnish an extensive array of employment and training services to the farmworker community, coupled with outreach initiatives targeting Migrant and Seasonal Farmworkers (MSFW) not reached through standard intake procedures conducted by local Employment Service offices.

In compliance with the Wagner-Peyser Act, as amended by WIOA, the Puerto Rico Department of Labor and Human Resources (PRDOLHR) holds the responsibility of formulating precise strategies to ensure that Migrant and Seasonal Farmworkers receive services through American Job Centers that are both quantitatively proportional and qualitatively equivalent to those provided to non-MSFWs. Furthermore, the WP is committed to ensuring that H-2A foreign guest workers and domestic farmworkers are well-informed about their rights and acquainted with labor laws designed to safeguard them.

Puerto Rico retains its designation as a significant MSFW State, driven by special circumstances such as the estimated high number of MSFWs in the service area. Despite the absence of One-Stop Career Center MSFW data in PY2022, Significant MSFW One-Stop Career Center designations for PY2023 remain unchanged. Puerto Rico continues to serve as a supplier state for various entities in the Eastern Region of the United States.

Nevertheless, the significant barriers faced by MSFWs in securing agricultural employment in the U.S., exacerbated by discriminatory practices of some H-2A employers demanding increased job experience, have led to a substantial decrease in the number of MSFWs seeking agricultural jobs on the mainland. This trend not only impedes local workers from applying for these positions but also creates opportunities for employers to hire non-U.S. citizen workers. The State Monitor Advocate is actively engaged in advocating for MSFWs, coordinating efforts with various federal agencies to identify unscrupulous H-2A employers who consistently violate H-2A, Wagner-Peyser, and labor-related laws.

The subsequent enumeration outlines some prevalent needs within the MSFW population, accompanied by strategies employed by PRDOLRH to address them:

NEEDS	STRATEGY
Lack of flexibility in their work schedules prevents them from accessing basic services, as agricultural work hours do not coincide with typical business hours.	As a strategy, the PRDOLRH has implemented the provision of services in the field by outreach personnel to migrant workers and or their families to coordinate referrals to support services, assistance in making appointments and arranging transportation for individual MSFW or a member of their family to and from American Job Centers or other appropriate agencies.
Poor access and/or assistance with transportation not only to their workplace but also to basic services such as health, legal advice, and education. Limited or poorly	To address this barrier, PRDOLRH has already agreed with employers to provide transportation to agricultural workers during the work period; some have implemented shelters or housing within the workplace premises for easier access. PRDOLRH evaluates

equipped housing facilities near your workplace.	whether worker housing meets federal OSHA regulations as a suitable place to live.
Lack of coordination of assistance to access educational development opportunities, as many appear to lack basic skills.	The PRDOLRH is close to establishing collaboration agreements with educational entities to provide training or education courses that improve or acquire the skills necessary to carry out their tasks. Additionally, the Interamerican University, San German Campus, currently administers the High School Equivalency Program and the College Assistance Program for Migrants (HEP/CAMP), which offers educational programs to students from migrant families or seasonal agricultural workers. HEP helps students who have dropped out of high school earn their GED, and CAMP helps students in their first year or college with academic, personal, and financial support.
The lack of young farmers since 65% of the island's agricultural workforce is over 55 years old. The decline in new farmers will have significant negative effects on the island's agriculture in the coming decades.	Puerto Rico has some municipalities that have implemented strategies to address this need by enabling disused schools to develop training and tree nurseries training, in planting coffee, banana, oranges, bread fruit, guanabana. In addition, the Municipality of Utuado has integrated the participation of youth people in agriculture through its Agriculture Program at the University of Puerto Rico. Also, the PRDOLRH considers evaluating whether students who receive assistance from the

	HEP/CAMP Program can be recruited to meet this need.
Lack of knowledge and adequate training to protect oneself from occupational risks.	The PRDOLRH has collaboration agreements to provide advice, guidance, and legal services so that workers know their rights and protect themselves at work.
Discriminatory practices in the hiring process reduce your chances of obtaining employment.	The PRDOLRH, through its programs, continues to promote the implementation of inclusion to avoid employment discrimination. Additionally, outreach staff along with the SMA provide support by coordinating referrals to legal services and channeling complaints of violations of their rights for investigation.
Low educational level, some totally illiterate.	The PRDOLRH, through its programs, continues to bring training to work areas to address this barrier and provide guidance on the range of services available in their native language, English and/or Spanish.
Lack of basic communication skills in English, which prevents them from seeking employment offered by US employers.	The PRDOLRH has bilingual staff available in DSE offices to offer guidance on the services available in English to help them identify employment with US employers. In addition, the DSE plans to include courses in English in its list of educational workshops.

PRDOLHR will continue its commitment to helping MSFWs overcome these barriers by ensuring that WP services, such as job search assistance, counseling, testing, and referral services, including the wide range of training services available under WIOA and the National Farmworker Jobs Program (NFJP) are made easily available to you.

b. Provide an assessment of the agricultural activity in the State: 1) identify the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identify any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

In 2020, the agriculture industry in Puerto Rico constituted over $800 million (0.62%) of the island's gross domestic product. This sector constitutes 15% of the food consumed locally. It is expected that these crops could cover approximately 30% of local demand, especially for smaller vegetables such as tomatoes, lettuce, and different types of tubers that are currently being imported. The existence of a prosperous agricultural economy has been hindered due to a heavy focus on industrialization, bureaucratization, poor land management, lack of alternative methods and a poor workforce. Its geographic location within the Caribbean exacerbates these issues, causing already scarce crops to suffer the devastating effects of hurricanes.

Puerto Rico has 487,775 acres of cropland, with a total value of agriculture sales of $485,053,483. Agriculture is Puerto Rico's oldest industry and will continue to be a significant economic driver for the next four years in most of the Island's regions. According to the 2017 USDA Agricultural Census for Puerto Rico, the agriculture industry in Puerto

Rico is responsible for approximately 21,029 jobs on a permanent or temporary basis when compared to 2022 (30,122), a reduction[3].

As of December 2023, the total number of workers (not seasonal adjusted) was 18,000, according to PRDOLHR's statistics for this worker group, experiencing a reduction in total workers with respect to October 2023 (16,000) of 2,000 workers. We conclude that this workforce reduction is closely related to climate change. Long periods of heat and drought have a negative impact on agricultural production. In June 2023, the government increased the Puerto Rico minimum wage to $9.50. The agricultural industry is exempt from the state minimum wage. Nevertheless, agricultural employers are paying between $8.50 and $9.50 to attract a workforce and to retina the current one.

According to the Puerto Rico Statistics Institute for 2019, we can pinpoint the top five labor intensive crops as follows based on the quantity harvested:

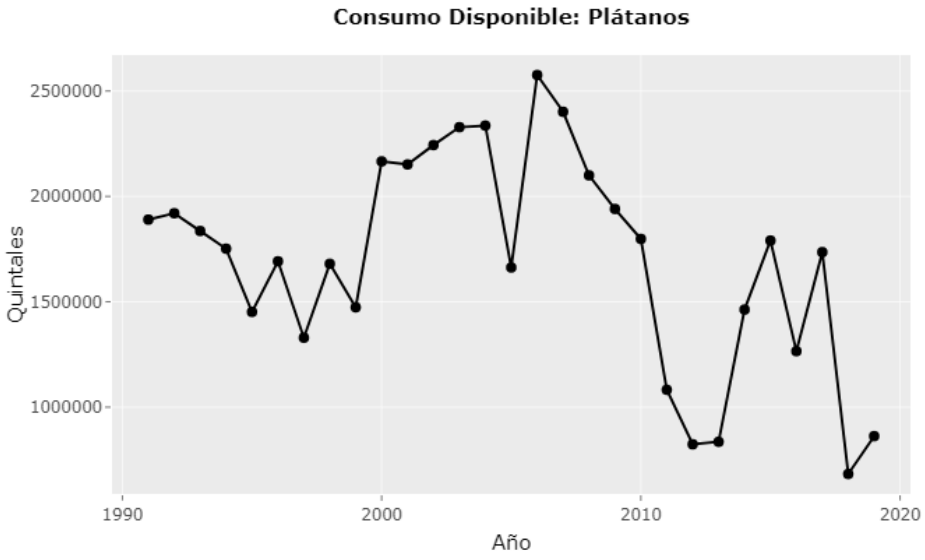
Crop	Quantity Harvested
Plantain	805,805 quintals
Green Bananas	606,569 quintals
Banana	326,614 quintals
Mango	282,726 quintals
Tomatoes	218,629 quintals

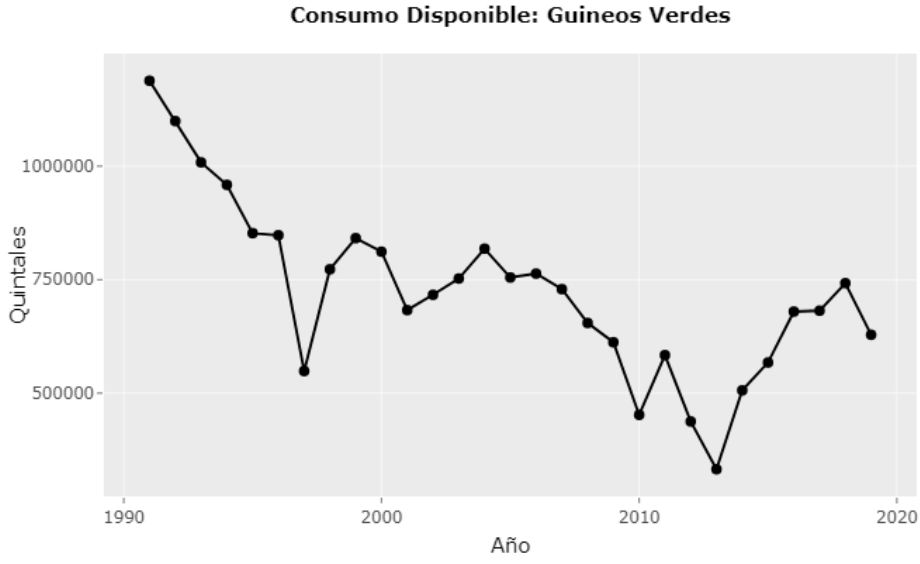
The Plantain industry remains among the top five most labor-intensive crops. Growing coffee represents one of the major contributions to the Puerto Rico's economy, one of its main businesses and way of life for much of the population of the central area of the island. According to the USDA Census of 2017, there are about 1,251 coffee farms, of whom the vast majority are small and medium producers. Coffee farms are mainly located in the

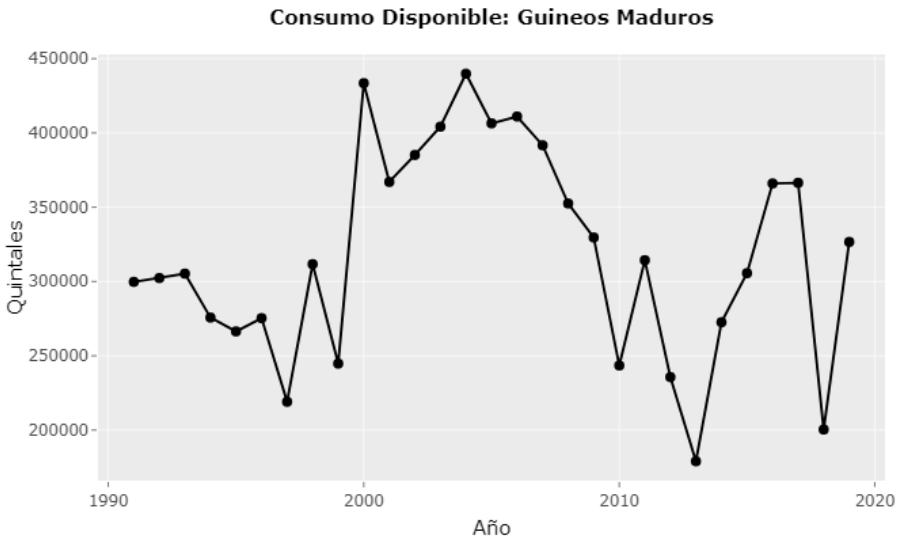
[3] In preparing the Agricultura Outreach Plan for 2023-2027, we faced the lack of statistics and data from governmental agencies responsible for keeping track of agicultural activities in Puerto Rico. Even the most Federal Agricultural Census for 2020, is still not been published by the US Department of Agriculture. This pose a big challenge to provide up to date data for the AOP.

central and western region of Puerto Rico although other small farms could be found in the Caguas region per the 2017 Agricultural Census. The major coffee harvesting was in the regions of Utuado, Lares and San Germán comprising of 15 municipalities in the central and western region. The months of heavy activity for this crop is during the months of September, October, and November.

Consumption of Puerto Rico's main crops in the last 30 years






Consumo Disponible: Guineos Maduros
Quintales
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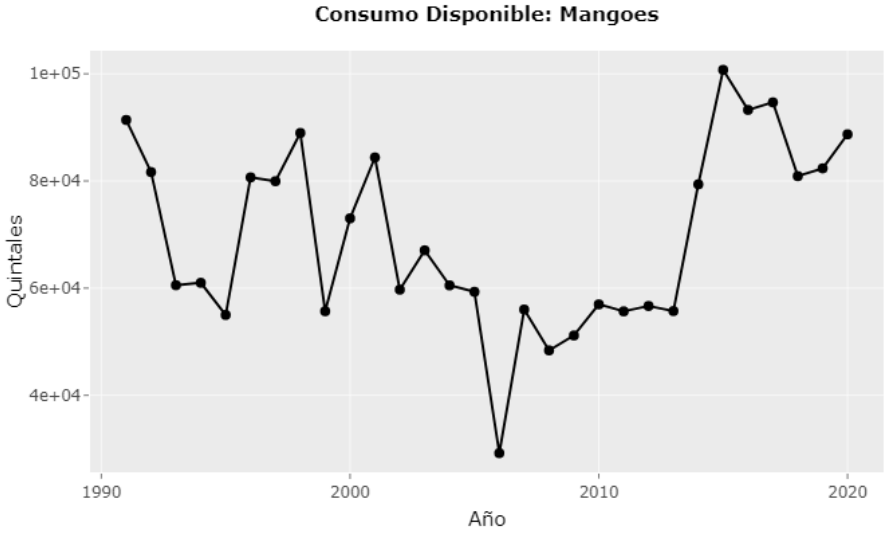
Consumo Disponible: Mangoes
Quintales
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8e+04
6e+04
4e+04
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2000
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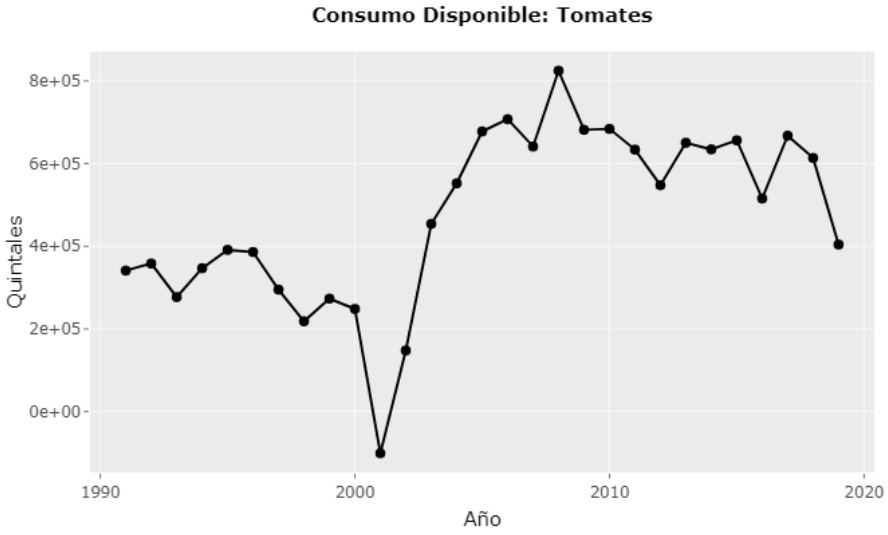
2020
Año


Consumo Disponible: Tomates
Quintales
8e+05
6e+05
4e+05
2e+05
0e+00
1990
2000
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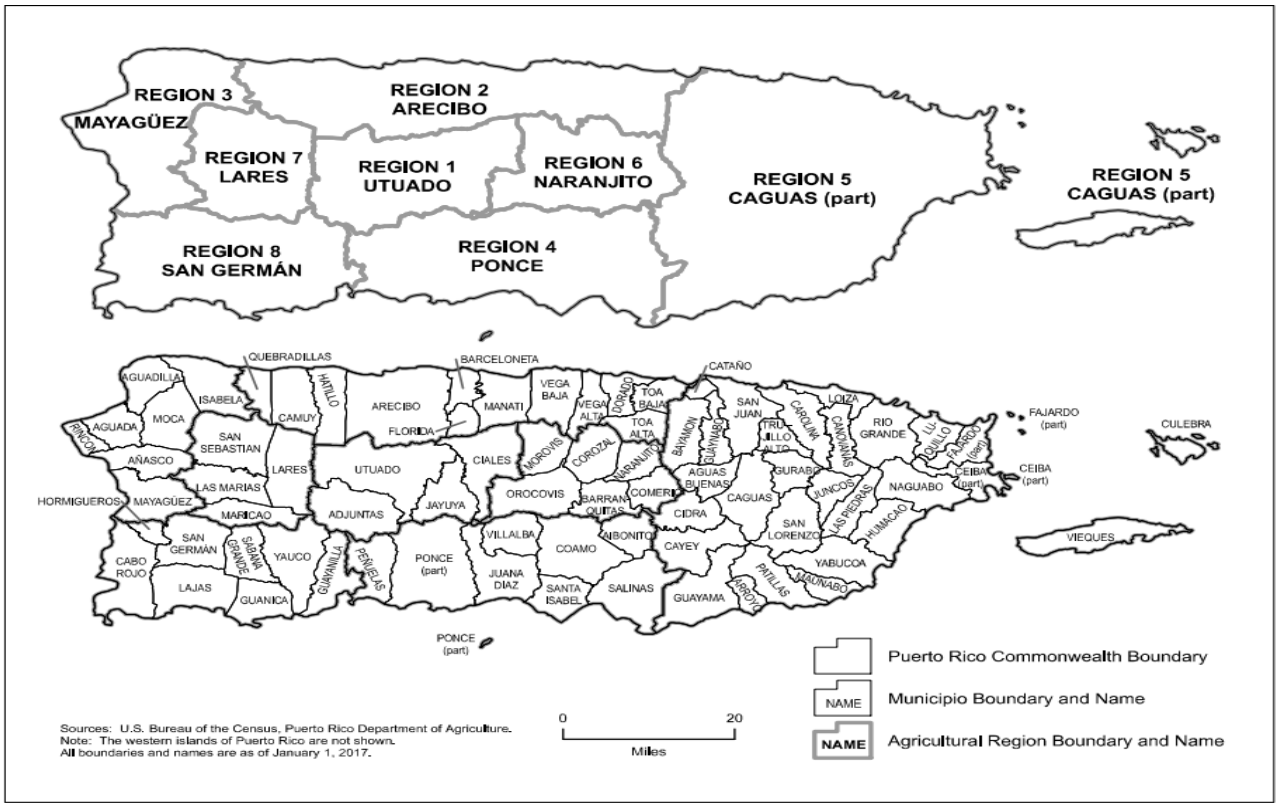
2020
Año

Agricultural Regions



The Ponce region is the major producer of vegetables accountable for approximately 46,302,725 pounds of harvested vegetables with approximately 104 farms and 2,201 acres harvested.

Plantains and bananas are one of the most economically important crops in Puerto Rico. In 2018 it contributed $53.2 million combined to the Gross Agricultural Income (2018 Agricultural Census). These industries are a source of income and jobs in the central area and in the coastal plains. Mayagüez, Ponce, Caguas, Naranjito and Lares regions are the major producers of plantains in Puerto Rico accountable for approximately 2,035 farms with an aggregate harvested of 10,624 acres which produces a total aggregate of 169,073 (thousands) plantains.

Plantains and bananas are usually ready for harvest anywhere from 14 to 20 months depending on the climate and other factors. Flowering usually happens within 10-15 months, while an additional 4-8 months is needed for fruit it develops and ripen.

Public Agricultural Land

The 85,798 acres of the Land Authority are distributed in 31 lines. As of May 2020, there were some 5,439 acres available, and 2,544 acres that could not be rented due to their conditions.

Table 46. **Plantains Harvested for Sale: 2018**

[Harvested and planted cuerdas were assumed to be the same. For meaning of abbreviations and symbols, see introductory text.]

Geographic area	Plantains					
	Farms	Cuerdas	Trees			Quantity harvested (thousands)
			Total	Nonbearing age	Bearing age	
Puerto Rico	2,035	10,624	10,352,963	4,079,341	6,273,622	169,073
Region 1 - Utuado	489	1,191	979,106	482,588	496,518	7,543
Region 2 - Arecibo	90	286	297,440	143,280	154,160	3,465
Region 3 - Mayagüez	196	1,617	1,570,790	714,700	856,090	17,728
Region 4 - Ponce	137	1,257	1,228,878	469,128	759,750	19,161
Region 5 - Caguas	284	1,971	2,094,120	770,195	1,323,925	29,263
Region 6 - Naranjito	279	1,934	1,953,720	680,231	1,273,489	58,918
Region 7 - Lares	438	1,828	1,773,539	718,292	1,055,247	26,824
Region 8 - San Germán	122	542	455,370	100,927	354,443	6,171

Table 47. **Bananas Harvested for Sale: 2018**

[Harvested and planted cuerdas were assumed to be the same. For meaning of abbreviations and symbols, see introductory text.]

Geographic area	Bananas					
	Farms	Cuerdas	Trees			Quantity harvested (thousands)
			Total	Nonbearing age	Bearing age	
Puerto Rico	1,157	5,207	4,300,538	1,229,234	3,071,304	226,981
Region 1 - Utuado	350	1,362	1,294,764	515,964	778,800	33,576
Region 2 - Arecibo	48	90	56,264	12,060	44,204	3,283
Region 3 - Mayagüez	52	110	65,632	10,466	55,166	1,057
Region 4 - Ponce	57	933	755,688	72,768	682,920	109,442
Region 5 - Caguas	74	187	150,531	35,151	115,380	6,002
Region 6 - Naranjito	101	355	305,616	56,400	249,216	12,173
Region 7 - Lares	341	1,234	962,723	235,922	726,801	22,565
Region 8 - San Germán	134	936	709,320	290,503	418,817	38,883

In Puerto Rico, we can see Pineapple crops in the municipalities of Lajas, Manatí, Santa Isabel, Guayanilla and Guánica. According to one grower, the varieties that are usually produced on the island are cabezona, Pan de Azúcar and MD-2. The latter turns out to be the most cultivated for commercial purposes since it can produce more than once per season. The good thing about this variety is that you can have several cycles in a single season. Through a good fertilization plan a grower can have several harvests a year. Naturally, the main harvest lasts about six months.

Pineapple crops have contributed $3 million to the Gross Agricultural Income in past years. This industry, along with the ones described above are a source of income and jobs in the valleys and coastal plains. Ponce, Lares, and San Germán regions are the major producers of Pineapple in Puerto Rico. They account for 90 farms for a total of 497 acres harvested.

Table 45. **Pineapples Harvested for Sale: 2018**

[Harvested and planted cuerdas were assumed to be the same. For meaning of abbreviations and symbols, see introductory text.]

Geographic area	Pineapples					
	Farms	Cuerdas	Plants			Quantity harvested (tons)
			Total	Nonbearing age	Bearing age	
Puerto Rico	131	652	8,517,292	3,847,466	4,669,826	4,725
Region 1 - Utuado	6	(D)	10,202	(D)	(D)	(D)
Region 2 - Arecibo	7	(D)	(D)	(D)	(D)	(D)
Region 3 - Mayagüez	16	50	(D)	(D)	(D)	(D)
Region 4 - Ponce	7	199	2,018,500	1,273,900	744,600	563
Region 5 - Caguas	6	3	4,700	3,740	960	8
Region 6 - Naranjito	6	11	(D)	(D)	(D)	(D)
Region 7 - Lares	62	118	2,292,362	1,077,956	1,214,406	1,923
Region 8 - San Germán	21	180	2,004,782	1,192,376	812,406	581

Agricultural employers are facing a shortage of workers, which is affecting the agricultural industry. According to one agricultural employer, the number of social aids provided by the federal government to low-income persons such as food stamps is the main reason why people refuse to work not only in agriculture but also in non-agricultural jobs. Other reasons for the shortage of workers can be

attributed to the low wages paid in agriculture when compared with other non-agricultural industries that increase their minimum wage up to $9.50/hour. In June 2023, the Adverse Effect Wage Rate (AEWR) increased to $9.70. This increase is applicable only if the employer hires foreign workers.

Data from the Office of Agricultural Statistics of the Department of Agriculture indicate that about 85% of the food consumed in the Puerto Rican archipelago comes from abroad and that local foods have higher sales prices than imported foods. These high prices reflect the struggles farmers face in their profession. According to the statistics of the Department of Agriculture, we can pinpoint some of the reasons for this:

- Labor – One of the reasons is due to higher productions costs. While labor in countries that export food to Puerto Rico is cheaper, in many Latin American countries, agricultural workers sometimes receive less than $2.00 an hour. Puerto Rico must comply with a minimum wage for agricultural workers that amounts to $7.25 an hour; sometimes more.
- Expensive machinery and increase in fuel - Many farmers in the archipelago have chosen to mechanize their agricultural operation. To achieve this, many farmers purchase imported machinery, which in turn must comply with federal regulations, such as compliance with the EPA's gas emissions limit. Added to this are the costs of fuel, which are 100% imported because Puerto Rico does not have oil sources. On the other hand, the salaries of machinery operators also contribute to higher costs since they exceed $15 per hour.
- Rises in temperatures - According to the Intergovernmental Panel on Climate Change, Puerto Rico is in a region where the manifestations of climate change can be observed more intensely. In recent years, the average temperature has risen, which affects agricultural production. For example, in the dairy sector, heat stress in cows in Puerto Rico is greater than in most regions of the United States, which reduces milk production in these animals.

- High costs of water and electricity - The costs associated with utilities, such as electricity and drinking water, are costly in Puerto Rico, and agricultural rates are even higher. In fact, the cost of electricity and drinking water in Puerto Rico is one of the highest in Latin America and the United States.

  According to the United States Energy Information Administration, by 2022, in Puerto Rico an average of 29.4 cents per kilowatt hour was paid, which represented more than double the US average, which is 12.9 cents per kilowatt. These costs reduce farmers' profits, forcing them to sell their products at higher prices.

  Other problems persist, as Dr. Orville M. Disdier Flores, executive director of the Puerto Rico Statistics Institute, performed a series of electronic surveys to farmers throughout Puerto Rico. Some of the issues farm owners mentioned were as follows:

- During the 2020-2021, 73% of the farmers interviewed indicated that the biggest barrier they had in their business was the high costs of materials.
- Additionally, 59% indicated that they faced problems with a lack of employees.
- On the other hand, 54% indicated they had problems due to weather events.
- 64% of farmers indicated that the greatest cause of their losses due to weather events was hurricanes.
- 50% of farmers indicated having had to change crops in the last 5 years due to production problems.
- 47% of farmers indicated having had to change the cycle or season to plant in the last 5 years.

As a result of the backdrop described above, agricultural employers began to turn their view to the H-2A Program for the first time in Puerto Rico.

The already difficult situation of a severe lack of workers turned into a real crisis forcing many agricultural employers, including coffee, banana, and vegetable growers, to go to social media to implore people for help to save their crops. To overcome this situation, some agricultural workers had to recur to the H-2A program. According to the Puerto Rico Employment Service Foreign Labor Certification Unit a total of 83 agricultural employers have submitted a total of 140 Agricultural Job Orders (ETA-790) associated to an H-2A Visa application requesting 1,166 H-2A visas to bring foreign worker to work in the different crops in Puerto Rico. From this CNPC has approved 125 Job Orders. As of the time of this annual plan, 720 foreign workers were hired by agricultural employers in Puerto Rico since October 2019 to December 31, 2023.

	2019	2020	2021	2022	2023	Totals
Employer	2	17	29	27	8	83
Job Orders Received	2	22	35	56	25	140
Job orders approved by CNPC	2	20	30	51	20	125
H2-A Visa Requested	14	177	266	491	218	1,166
Foreign Workers in PR	14	91	204	355	56	720

Another element to consider in the present volatile employment environment of the MSFWs in Puerto Rico is Public Law #87, approved on June 22, 1962 (Public Law #87). It allows employers to conduct active recruitment in Puerto Rico to perform work in the U.S. mainland. These job offers are typically not for agricultural

employment although every so often there are farming jobs and offers for landscaping, processing plants and food packagers. The job offers promoted under this law could be temporary or permanent in nature. The increase in this type of employment offers have significantly impacted the MSFWs in Puerto Rico because they are gravitating towards these jobs with better chance of permanency, much better salaries, and the possibility of permanent relocation rather than pursuing the regular Interstate Job offers that are posted from other states under the ARS.

There is a need for educational opportunities and incentives for these new farmers, farmers looking to shift to new crops or alternative farming methods, and MSFWs interested in becoming entrepreneurs. Directing more efforts and resources to these needs will promote the development of new agricultural employers and increase the employability of the MSFWs of Puerto Rico. In addition to these challenges, the agricultural community does not have up to date agricultural data. The lack of agriculture statistics is forcing farmers, private entities, and government agencies to plan without adequate information on the status of the agricultural industry. The PRDOLHR, with the assistance of the SMA, will explore the possibilities of joining efforts with partners and organizations such as PathStone, the Puerto Rico Department of Education (PRDOE), the University of Puerto Rico Agricultural Extension, Puerto Rico Farm Bureau, the PRDOA and others, to create a series of orientation sessions to be offered in every region to promote existing and upcoming educational opportunities and incentives aimed to alleviate the above listed issues.

c. Provide an assessment of the unique needs of farmworkers by summarizing migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must consider data supplied by the WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or

federal agency data sources, such as the U.S. Department of Agriculture and the U.S. DOL, Employment and Training Administration.

Assessing the unique needs of farmworkers entails a comprehensive summary of Migrant and Seasonal Farmworker (MSFW) characteristics. This involves analyzing factors such as the predominant countries of origin, languages spoken, the estimated number of MSFWs during peak and low seasons, and their classification as migrant, seasonal, or year-round farmworkers. This information necessitates collaboration with WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, MSFW organizations, employer associations, and relevant state and federal agencies, including the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

As indicated by the Worker Group Survey, specifically Table 6, which details people employed by the Main Occupational Group (Not Seasonally Adjusted), the agricultural workforce in Puerto Rico is currently at 50,000, exhibiting an increase in workers. This survey encompasses the entire agricultural workforce, irrespective of seasonal status, even though agricultural employers in peak seasons are obligated to utilize the H-2A program.

The farmworker demographic in Puerto Rico has undergone changes since 2019, primarily due to the recruitment of foreign workers in response to the shortage of local agricultural labor. Despite this, farmworkers in Puerto Rico continue to represent the predominant agricultural workforce, totaling 50,000 as of November 2023, according to data from the Worker Group Survey (Table 6, Not Seasonally Adjusted). The reliance on foreign workers stems from the scarcity of an indigenous agricultural workforce, with individuals arriving from countries such as Costa Rica, Dominican Republic, Colombia, Honduras, Guatemala, El Salvador, and Mexico.

A diminishing number of migrant workers are being referred through the Agricultural Recruitment System (ARS) to agricultural job opportunities in the United States. This decline is attributed to the availability of longer-lasting and

higher-paying employment opportunities through the Promotion of Employment Opportunities Abroad Program (P.L. 87 of June 22, 1962, as amended). Consequently, MSFWs are increasingly gravitating towards alternative types of employment on the U.S. mainland. A prevalent barrier faced by MSFWs in Puerto Rico is the combination of a low educational level and a limited understanding of the English language, rendering them perceived as unprepared for insertion into the non-farm labor market. This perception results in fewer services being offered to them, exacerbating the challenges posed by their educational shortcomings. Overall, most farmworkers in Puerto Rico are economically and educationally disadvantaged, possessing low-level skills that hinder their readiness for non-farm labor market participation.

d. Outreach Activities. Local office outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs that are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Efforts are addressed to hire four Outreach Workers due to retirement and/or resignation. The hiring efforts are to hire Outreach workers for the local areas of Sureste (Humacao), AMSI Guayama (Guayama), Mayagüez, and Norte Central (Arecibo). Currently we have only two active Outreach workers for the local areas of Coamo and San Germán. This is a hard to fill position that requires staff persons designated as Outreach Workers to be in the field visiting employers and performing outreach to MSFWs to overview their rights not been violated such as wages, housing, working conditions, etc. The PRDOLHR is committed to comply with 20 CFR 653 to conduct Outreach activities as required by law and regulations. The following sections contain the Outreach activities to be carried out during the period of July 1, 2024 to June 30, 2027.

i. Contacting farmworkers who are not being reached by normal intake activities conducted by employment service offices.

Puerto Rico has been designated as a significant MSFW supplier. As such, MSFWs significant offices will operate an Outreach program to locate and contact MSFWs not being reached by regular intake procedures. The lack of Outreach Workers put Puerto Rico in a non-compliance situation. We are committed to addressing the situation and to having all remaining Outreach workers hired by the end of March 31, 2024.

Outreach workers are full time and make contacts with MSFWs all year-round and during peak agricultural activity periods, which vary dependent on the crop. Contacts are made at locations where MSFWs live and congregate. Written and oral presentations are provided to MSFWs on services such as, but not limited to:

- Information regarding the full array of services offered in the career centers.
- Referral to agricultural, H-2A orders, and non-agricultural employment.
- Referral to training.
- Referral to supportive services.
- Career counseling.
- Job development.
- Information on the Wagner-Peyser complaint system.
- Summaries of farm worker rights (terms and conditions of employment)

When making contacts, Outreach workers obtain permission from the agricultural employers to conduct outreach activities within the limits of the employer's property. During the contact, Outreach workers provide valuable information about services available to them in the career centers and

encourage MSFWs to visit the nearest career center for the full range of employment, placement, and training services available to them.

In the event MSFWs cannot or do not wish to visit a physical one-stop system location, Outreach staff help the worker to complete an application for ES (ES-511), provide referrals to employment opportunities for which the workers are qualified, assist them in preparing complaints, or make appointments for needed services. As appropriate, Outreach staff will carry out follow-up contacts with MSFW customers.

The State Monitor Advocate also performs a variety of advocacy activities, including, but not limited to:

- Overseeing the operation and performance of the MSFW complaint system.
- Contributing to the State AOP and reviewing the daily reports of outreach workers.
- Participating in public meetings throughout the state.
- Meeting with farm worker groups and employers to promote the use of the career center services.

The State Monitor Advocate also meets and works with other workforce agencies to coordinate services to MSFWs and raised issues, as appropriate, to ensure that the development of new systems and strategies for service delivery will address the needs of MSFW customers. The State Monitor Advocate conducts onsite reviews at One-Stop Centers, ensuring local workforce systems follow the designated equity indicators and minimum service levels for MSFWs. The State Monitor Advocate also provides training

and technical assistance, as needed, to staff of partner agencies regarding outreach and services to MSFWs, and the ES complaint system.

The six Outreach Workers (four of the six outreach positions are in the process of being filled) are stationed within Puerto Rico One-Stop Career Centers. These centers are located close to high populations of MSFWs.

Since the staff is strategically located close to the MSFWs population the goal is to reach as many MSFWs as possible from the estimated number of 22,000 farmworkers during the period of July 1, 2023, and June 30, 2024. All Outreach workers are full-time staff. Therefore, an objective for the AOP is for the outreach staff to conduct frequent visits to farms with a workforce of MSFW at least four days per week. Outreach workers must perform at a minimum of 25 MSFWs contacts per week (1,200 per program year) and to provide services to MSFWs working on the farm during and after the harvest season. The goal is to keep an aggregate average of MSFWs contacts of at least 40 contacts per week to comply with the established performance goal per ETA-5148.

Staffing and minimum contact levels per program year (PY 2023-2027)

Area/service location	Outreach workers	Contacts per year	Designated outreach worker status
North Central Region	1	1,200	Vacant
Southeast Region	1	1,200	Vacant
AMSI Guayama Region	1	1,200	Vacant
South Central Region	1	1,200	Hired
Southwest Region	1	1,200	Hired

Area/service location	Outreach workers	Contacts per year	Designated outreach worker status
Mayagüez/Las Marías Region	1	1,200	Vacant
Total	6	7,200	

ii. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

For outreach workers to make an efficient job that could be beneficial to farmworkers and agricultural employers, they must be trained in all required areas and competencies to comply with 20 CFR 657.103 and be able to:

- Develop strategies and techniques to locate and contact MSFWs to provide information for services available at the local One-Stop Centers.
- Use the information of the Labor Market Information to inform MSFWs of specific job openings (agricultural and non-agricultural) available to them. Also, to assist agricultural employers in securing workers and acquiring information on labor market trends.
- Provide the necessary competencies on labor related laws affecting

MSFWs such as the Fair Labor Standard Act (FLSA), the Migrant and Seasonal Farmworkers Protection Act (MSPA), Equal Employment Opportunity Commission, H-2A Regulation, Housing, and other State regulations governing MSFWs.

- Assist MSFWs in filling job applications, preparing worker complaints, making appointments, and arranging for transportation.
- Provide information about services available through electronic means and teach them how to access this information.
- Identify qualified MSFWs seeking employment, using 20 CFR Part 653. Initial and follow-up outreach efforts will be made to provide needed services and assist MSFWs in landing a job or improving employability.
- Contact agricultural and non-agricultural employers, program operators, community or faith-based organizations, and education-and-training providers on behalf of MSFWs.
- Soliciting jobs, training opportunities and employment related services for MSFWs.
- Provide agricultural and non-agricultural employers with information, services and assistance requests related to labor issues and needs.
- Accept job postings while performing field outreach activities.
- Refer qualified MSFWs from the MSFWs Outreach log and from previous contacts through follow-up activities if there are job openings for referral.
- Select qualified MSFWs from the MSFWs Outreach log to perform job development activities to enhance MSFW applications by including

their additional occupational skills, transferable occupations, and matching positions with non-agricultural jobs, when no suitable, agricultural job openings are available for referral.

The hired Outreach Workers were trained and participated in workshops provided by PathStone, Legal Services Farmworker Division, PROSHA and the Wage & Hour Division to properly train the Outreach workers of WP and PathStone in all required areas and competencies established on 20 CFR 653.103. Some of the areas and topics covered were:

- Develop strategies and techniques to locate and contact MSFWs to provide information for services available at the local AJCs.
- Use the Labor Market Information to inform MSFWs of specific job openings (agricultural and non-agricultural) available to them.
- Assist agricultural employers in securing workers and acquiring information on labor market trends.
- Provide the necessary competencies on labor related laws affecting MSFWs such as the Fair Labor Standards Act (FLSA), the Migrant and Seasonal Farmworkers Protection Act (MSPA), Equal Employment Opportunity laws, H-2A Regulations, Housing, and other State regulations governing MSFWs.
- Assist MSFWs in filling job applications, preparing worker complaints, making appointments, and making transportation arrangements.
- Provide information about services available through electronic means and teach them how to access this information.
- Identify qualified MSFWs seeking employment and plan follow-up visits to provide needed services to improving their employability.

- Contact agricultural and non-agricultural employers, program operators, community or faith-based organizations, and education-and-training providers on behalf of MSFWs.
- Soliciting jobs, training opportunities and employment related services for MSFWs.
- Provide agricultural and non-agricultural employers with information, services and assistance requests related to labor issues and needs.
- Accept job orders while performing field outreach activities.
- Refer qualified MSFWs to job openings of their interest.

In addition to providing information about the AJC services, the Outreach workers frequently inquire about the working conditions, wages, and overall wellbeing of the MSFWs and encourage them to visit the nearest career center for the full range of employment, placement, and training services.

A network of American Job Center will allow the referral of workers to both agricultural and non-agricultural jobs. Coordinated efforts will continue between the ES, the Wage and Hour Division, OSHA, and the State Legal Services Farmworker Division, to provide training to outreach workers and the local WP staff. These efforts will result in highly trained Outreach workers in areas such as agricultural workplace safety information to assist and inform MSFWs how to undertake work safety measures.

The SMA will be responsible for meeting with other workforce agencies to ensure that services provided to MSFWs are rendered in a manner that is quantitatively proportional and qualitatively equivalent to those provided to non-MSFWs. To accomplish this task, the SMA must work in the development of monitoring tools that will simplify the timely and accurate identification of issues and a series of strategies and protocols for service delivery that will

ensure continuity and increase success rate when addressing the needs of MSFW customers.

During the onsite reviews of the AJCs, the SMA must analyze all available data regarding the provision of services of the local workforce systems to determine their compliance with the designated equity indicators and minimum service levels for MSFWs. The SMA will also provide training and technical assistance to staff and partner agencies as needed.

iii. Increasing outreach staff training and awareness across core programs, including the Unemployment Insurance (UI) program and training on identifying UI eligibility issues.

To comply with federal regulations, all WP must be trained in the Agricultural Recruitment System (ARS). The training provides important information to staff on the use of the ARS system, to fill the need for workers during the harvest season and for other available agricultural jobs. Outreach staff must attend an ARS training session once per year. This will provide the Outreach staff with a refreshment session on all matters related to the ARS.

To better serve the needs of agricultural employers, WP merit staff must focus on employer issues. Employer services are planned and implemented based on each career center service delivery plan. To make sure that agricultural employer needs are met, career centers must provide key activities in the agricultural referral process, such as integrating services for agricultural employers and workers; identifying job- ready workers once they arrive at the work site; and providing employers with labor market information related to their specific industry, such as farmworker rights and support service information, among other services.

The efforts to be provided by Outreach staff will cover those described in 20 CFR 653.107(i-p). These efforts are the minimum required, but staff will be more thorough in their presentation, providing a comprehensive outline of

services available in their area. The purpose of the MSFW outreach program is to take available services directly to where MSFWs live and work if they are unable to come to the One-Stop Centers. The MSFW program provides the necessary framework for the One-Stop Centers staff to locate, contact, and enhance employability of MSFWs in Puerto Rico. Outreach interviewers provide services at the point of contact or at the One-Stop Centers office. If needed, services which are not available at the local One-Stop Centers will be provided by the Outreach worker by means of referrals to other WIOA partners, agencies and organizations that provide the needed assistance. All Outreach activities will be funded with Wagner-Peyser funds for those activities managed by the Employment Service. All outreach activities managed by PathStone will be funded through WIOA- 167 funds.

Outreach workers staff contact growers during the harvesting seasons to plan for upcoming labor needs. Coordination is made with the growers and with other career centers to match the labor needs of employers with workers qualified to fill the jobs. In line with PRDOLHR's focus on services to business, State merit staff provide Outreach personnel with comprehensive listings of area growers to aid in scheduling visits throughout the agricultural community. PRDOLHR also collaborates with the Puerto Rico Department of Agriculture to ensure all resources for growers and agricultural workers are coordinated in a seamless fashion. Additionally, Outreach workers have a strong relationship with the UPR's Agricultural Extension Service/Department of Agriculture regional field staff to collaborate and improve services to agricultural employers and MSFWs.

PRDOLHR's focus is on services to business, while the state merit staff provides Outreach staff to aid in scheduling visits throughout the agricultural community. The SMA will reach out to the Puerto Rico Department of Agriculture to design strategies that could ensure all resources available to the agricultural community are coordinated in a seamless fashion.

Capitalizing on the long-standing relationship between the Outreach workers with the University of Puerto Rico's Agricultural Extension Service/PRDOA regional field staff, joint meetings will be coordinated to collaborate and improve services to agricultural employers and MSFWs. The SMA will make recommendations to the AJCs to ensure that key staff will be granted access to the local UI system to allow them to view basic information of MSFWs, which could be used to assist them with issues related to application for benefits, employment records, interstate claims and eligibility issues. Training in the basic unemployment data system will be arranged for the selected staff.

(4) Provide outreach staff professional development activities to ensure that they can provide high-quality services to both jobseekers and employers.

20 CFR 653.107(i-p) requires PRDOLHR to operate an Outreach Program to reach farmworkers that for different reasons normally did not reach ES local offices. The PRDOLHR provides outreach through six career centers in agriculturally significant areas and continues to reinforce the Outreach program to comply with regulations as required by 20 CFR 653.107. These centers will be part of the State's WIOA One-Stop Centers system, serving as either a comprehensive One-Stop Center or an affiliated One-Stop site. The employment-related needs of MSFWs are of primary importance to the PRDOLHR. These needs will be a priority for the following six significant career centers:

Career Service Servicing Areas serving MSFW

Career Center Locations	Municipalities served
North Central Region	Quebradillas, Camuy, Hatillo, Arecibo, Lares, Utuado, Jayuya, Adjuntas

Southeast Region	Humacao, San Lorenzo, Juncos, Las Piedras, Maunabo, Patillas, Yabucoa
AMSI Guayama Region	Guayama, Arroyo
South Central Region	Coamo, Villalba, Juana Díaz, Santa Isabel, Salinas,
Southwest Region	San Germán, Cabo Rojo, Hormigueros, Lajas, Sabana Grande, Maricao, Yauco, Guayanilla, Peñuelas, Guánica
Mayagüez / Las Marías Region	Mayagüez, Las Marías

Source: PRDOLHR.

The MSFW Outreach Specialists and the American Job Centers staff are included in cross-training from the standpoint of sharing information on the ES and Career Centers programs as well as learning the basics of the array of programs offered through the Centers and outside the Centers. Program cross-training is a continuous process to be able to offer a more integrated plan of service. Training will include information on Workforce Innovation and Opportunity Act (WIOA), Outreach Program, MSFW classification, Agricultural Job Orders, Welfare Transition (WT)/Temporary Assistance for Needy Families (TANF), Job Corps, business services, resource rooms, workshops, Trade Adjustment Assistance (TAA), Veterans, and Wagner-Peyser programs. For the purposes of referring participants to other support services, training will also include information on vocational rehabilitation, GED programs, childcare, and transportation.

In addition to the above, Outreach workers will be provided with workshops on issues related to MSFWs such as child labor, human trafficking and sex harassment, use of pesticides, OSHA Sanitation Standards, Housing, etc., to provide Outreach staff with the professional development and tools required to serve the MSFW population.

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

The newly designated SMA must enter an MOU with the NFJP Grantee, PathStone. As the ETA designated grantee for Puerto Rico, PathStone operates the National Farmworker Jobs Program (NFJP) and provides career and training services and related assistance for MSFWs. The cooperative agreement will serve to assist in establishing and demonstrating effective outreach coordination, enhance service delivery to MSFWs and increase registration activities between PathStone and significant career centers staff. The partnership provides for the sharing of labor market information, training, supportive services, and job-related resources available to MSFWs. The cooperative agreement will improve mutual capacities and the likelihood of effective customer service, by sharing the responsibilities for this population and displaying an efficient use of available resources.

The primary benefits of the cooperative agreement with PathStone are:

1. The information exchange process is streamlined, something that will improve the occurrence and accuracy of shared information.
2. Each organization will be better prepared to coordinate actions, including those that may require immediate intervention when serving MSFWs.
3. Staff awareness of emerging issues regarding the MSFW community has increased.
4. The establishment of a vehicle of communication with the career centers and PathStone to periodically review and assess quality services to MSFWs.
5. Reports are shared on the staff hours spent performing MSFW outreach activity.

PathStone also has cooperative agreements with several career centers and community partners focusing on integrated service strategies and resource sharing. Collaborative approaches reduce duplication of effort and ensure that resources are used effectively for the benefit of customers.

PathStone Corporation is also the NFJP housing grantee for Puerto Rico and provides housing support services to MSFWs through rental and utility assistance. The State Monitor Advocate and the PRDOLHR Outreach workers will continue to coordinate with PathStone staff in their efforts to assist growers in providing safe and affordable housing for farmworkers, hence expanding the range of services available to this population.

(5) Services provided to farm workers and agricultural employers through a one-stop delivery system. Describe the State agency's proposed strategies for:

(A) Providing a full range of employment and training services to the agricultural community, both farm workers and agricultural employers, through a one-stop delivery system. This includes:

(i) How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers; and

Each outreach staff establishes a list of available resources and develops partnerships with local organizations serving MSFWs. Resources include, but are not limited to: Department of Health, Farmworker Health Program, State Workers Compensation, Migrant Legal Services, PathStone Corporation, PRDE's Adult Education program, and ESL and GED services to MSFWs. Career centers will collaborate with Local Boards to ensure MSFWs have training opportunities for jobs in demand in the area. We believe there are enough resources for Outreach but will continue to seek additional resources to meet the needs of MSFWs as they are identified.

Although Outreach services are provided to MSFWs who cannot or do not wish to visit a physical career center location, other MSFWs visit the career centers in search of employment, placement, or training services. At the career center, MSFWs receive an orientation which is a requirement prior to receiving any services they might apply for. Through this orientation, workers will become aware of the range of services available to them at the center and how to apply for such services.

Once the workers are informed of all the services available to them, depending on their personal employment needs, might opt to use the self-service resource area where they can access the Internet to perform job searches, preparation of resumes, browsing of job offers, among other services. If in need of employment and placement services, the worker is referred to a Wagner-Peyser Employment Specialist. Here, the worker is registered in Wagner-Peyser and assessed to determine his/her job readiness. Depending on the assessment, the MSFW might be referred to an available job offer/job development, or to an Occupational Counselor for additional career services. If deemed not job ready, the MSFW is referred to one of the several partners located in or out of the center to provide the necessary assistance in attaining the skills necessary to get a suitable job.

Once registered, a farmworker might receive the following career services:

- Assistance for program compliance
- Preparation of job applications

- Job information per type of referral to specific employment opportunities (agricultural and non-agricultural), training, counseling, and other services
- Support service referrals for individuals or family members
- Information and referrals to PathStone or other appropriate program services
- Information about farm worker rights (Federal and State employment related protections laws such as MSPA and FLSA)
- How to contact other organizations servicing MSFWs, such as the Migrant Legal Services, Migrant Health, and others
- When applicable, Outreach Staff will make appropriate referrals to PathStone, Inc. as stipulated under the Job Service Cooperative Agreement or Memorandum of Understanding (MOU)

The ARS System is operated and coordinated within the One-Stop Centers by WP and other partners. As a result, the Foreign Labor Certification Unit can share Agricultural Job Orders, both local, intrastate, and interstate, with the AJCs staff and PathStone and receive referrals from the different AJCs. The FLC Unit receives job orders from the different State Order Holding Officers asking for qualified workers for open agricultural jobs. These job orders are mainly associated with an H-2A application. The job orders are distributed to the local Employment Service Offices via SharePoint lists where they be placed for job seekers applying for these agricultural jobs.

Outreach workers and WP staff at the career centers will identify workers and screen them against employer requirements; coordinate referrals with the Puerto Rico FLC Unit and assist with

scheduling interviews with employers and make travel arrangements.

One-Stop Centers will continue making efforts to strengthen the working relationships with MSFWs and employers. AJC staff assists Outreach workers in providing MSFW with the full range of services available through the One-Stop Centers.

Federal requirements call for services to be provided to MSFWs in a "qualitatively equivalent and quantitatively proportionate" to the services provided to other non-MSFWs. This means that MSFWs are to receive all workforce development services, benefits, and protections on an equitable and non-discriminatory basis (i.e., career guidance, testing, job development, training, and job referral). It is necessary, therefore, to continue strengthening the capability of the WP staff to serve the needs for farm working jobs, by helping them find employment through the Labor Exchange System. Also, ES provides a Job Bank where MSFWs can search for jobs they may qualified for.

Career centers staff assist employers by referring qualified workers to the different job orders posted. However, the process still poses challenges for career center staff to provide farmworkers with available jobs since jobs available in the Puerto Rico Job Bank are mostly in professional jobs which require college preparation, advance skills, and job experience. Information on services, including how to register for services, is provided online ensuring that farmworkers have the full range of services available whether services are received in the field or a career center. Bilingual staff are also made available to assist non-Spanish speaking customers.

The career centers receive Job Orders through the Interstate Clearance System. Concerted efforts are made with Order Holding States to refer qualified MSFWs to these job openings. To make sure that employer labor needs are met, WP merit staff works with job matching results to ensure that qualified MSFWs are referred to the corresponding job opening. Outreach efforts are used to recruit workers outside the local job site recruiting area. The outreach staff is committed to providing information on the services provided at the career centers and will help employers posting agricultural job orders and referring workers to these very same opportunities.

(ii) How does the State serve agricultural employers, and how do they intend to improve such services?

PRDOLHR plans to continue implementing strategies and the use of best practices to address the needs of agricultural employers including the following topics:

- Limited knowledge of State/Federal employment laws and regulations. Career centers will continue to host Forums/Workshops to educate employers and agricultural crew leaders regarding State/Federal laws and regulations.
- Lack of efficient use of local human resources. Career centers staff must encourage/facilitate communication between growers, regarding farmworkers' specific needs. One possible resource is Puerto Rico's Agricultural Extension Program.
- Lack of facilities/staff to screen and interview potential farmworkers. Career centers might provide temporary office space that agricultural employers might use as a job-interviewing facility. Workforce Center staff might also provide intake and referral activities at the growers' locations.

- Encourage farm labor contractors to register. Career centers staff might provide forms and instructions for completing crew leader registrations and ensure that farm labor contractors' registration cards are kept current.
- Housing: The ARS requires employers to provide housing at no cost to workers who cannot reasonably return to their place of residence after each working day. This is one of the unique challenges Puerto Rico agricultural employers faces when using ARS; especially when providing housing for coffee pickers. Also, the PRDOLHR is planning to coordinate efforts and grant activities with PathStone, Inc., the Housing Grant coordinator for the NFJP grantee under the WIOA 167 housing grant for Puerto Rico, to address the housing needs of farm workers and their families.

Agricultural employers and MSFWs are critical to the State's workforce, especially in the geographic areas where agriculture is the key economic industry. Serving the needs of the agricultural industry requires coordination among the following stakeholders:

- State Monitor Advocate
- WIOA Section 167, PathStone, Inc.
- Groups that represent MSFWs
- Agricultural employer organizations
- Wage and Hour Division (Caribbean District)
- Equal Employment Opportunity Commission (EEOC)
- Federal agencies with regulatory responsibilities for enforcing laws related to agricultural labor.
- Other organizations such as OSHA

Each of the above organizations has been instrumental in the ongoing efforts of providing support for the benefit of agricultural employers and their workers. They were provided with the opportunity to comment on and participate in the development of this plan.

(B) Marketing the Complaint System to farm workers and other farm worker advocacy groups.

In fulfilling its responsibilities under Federal regulations, the PRDOLHR has established a Uniform Complaint System under WP pursuant to 20 CFR 658.400. With this complaint system in place, career centers have the capacity to resolve MSWF complaints and any others job seeker impacted by WP activities. The state and local managers have the responsibility to resolve complaints filed pursuant to 20 CFR 658.400.

The State Monitor Advocate is responsible for the oversight, operation, and performance of the complaint system. The Monitor is also responsible for the marketing and promotion of the complaint system to other MSFW advocacy groups and partners such as MSFWs served by PathStone. The State Monitor Advocate also oversees that Outreach workers inform MSFWs about their rights and the way to contact the complaint system, and that provides them help to file a claim, as appropriate.

During the required career center orientation, job seekers are briefed on the Wagner-Peyser complaint system. During registration, a WP Employment Specialist explains the complaint system to the worker and how to properly file a complaint. A complaint form is handed out to the worker at that moment. He is also informed of his rights as an MSFW.

(C) Marketing the Agricultural Recruitment System for the U.S. Workers (ARS) to agricultural employers and how they intend to improve such publicity.

ES is committed to market the use of the ARS among employers in the local service areas by reinforcing Outreach Workers skills and knowledge to promote the ARS within agricultural employers, including ES staff assigned to placement tasks. Regarding the H-2A program, agricultural employers fear using the system due to the high costs it represents for them to provide the additional guarantees to MSFWs such as housing, and transportation, reimbursement, as required by applicable regulations. State laws have been forwarded to stimulate and regulate the employment of foreign workers with no avail since this is a Federal occupied field.

Agricultural industry in Puerto Rico is far different from the agricultural industry in the United States and local agricultural employers cannot afford the costs of implementing the required guarantees they need to provide to MSFWs, local or foreign guest workers.

To enhance the advertising of the agricultural recruitment system, the Puerto Rico Department of Labor and Human Resources (PRDOLRH) is utilizing various media channels such as radio, television, and billboards to promote the employment platform. This platform provides employers access to a personal resource bank of available workers and links for registration on the platform for recruitments.

(6) Other Requirements.

(A) *Collaboration*. Describe any collaborative agreements the State Workforce Agency (SWA) has with other MSFW service providers, including NFJP grantees and other service providers. Describe how the SWA intends to build up or increase collaboration with existing partners and establish new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Cooperative agreement with PathStone

As mentioned before, an MOU must be entered int between the SMA and the NFJP Grantee. The former MOU must be reviewed and evaluated as a starting point to develop the new MOU which must provide a better comprehensive outreach approach to MSFWs in Puerto Rico. The MOU must be developed and executed not later than June 30, 2024, to enforce the responsibilities of each partner in the agreement.

Legal Services of Puerto Rico

The PRDOLHR has linkages with the Legal Services Program and establishes collaboration to provide orientation and valuable information to MSFW who migrate to the United States to work in farm work through the Federal Agricultural Job Order Clearing System. Before departing to work in the USA, workers are briefed on the rights available to them as MSFWs. Coordination is made with Legal Services if any worker needs legal services due to the violation of his/her rights by the agricultural employer while working in the USA.

U.S. Department of Labor, Wage and Hour Division

The Memorandum of Understanding (MOU) between the United States Department of Labor (DOL) and the Puerto Rico Department of Labor and Human Resources (PRDOL&HR) exemplifies a collaborative commitment to effective communication and cooperation in areas of mutual interest. This MOU signifies the shared dedication of both entities to enhancing compliance assistance for employers and employees. Importantly, the agreement does not involve any financial commitments, exchanges of funds, personnel, property, or services. The collaboration encompasses various initiatives, including coordinated investigations, sharing of training materials, cross-training of staff, and the facilitation of outreach events. Through this MOU, DOL/WHD and PRDOL&HR aim to foster a synergistic

partnership that promotes efficiency and delivers valuable support to the workforce and business community.

The Puerto Rico Department of Labor and Human Resources (PRDOL&HR) is actively engaged in exploring additional Memoranda of Understanding (MOUs) with potential partners to fortify ongoing initiatives. In line with its commitment to strategic collaborations, PRDOL&HR seeks to establish MOUs with entities currently contributing support to existing efforts. This proactive approach underscores the department's dedication to expanding its network of partnerships, fostering cooperation, and maximizing the impact of its programs. Through these prospective MOUs, PRDOL&HR aims to create synergies that will further enhance the effectiveness and reach of its initiatives, reinforcing its commitment to the welfare of the workforce and the advancement of labor-related objectives.

(B) *Review and Public Comment*. In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, for at least forty-five calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing interest and allowing at least 30 days for review and comment. The SWA must: 1) consider any comments received in formulating its final proposed AOP; 2) inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons; and 3) transmit the comments and recommendations received and its responses with the submission of the AOP.

i. The AOP must include a statement confirming that NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested employer

organizations have been given an opportunity to comment on the AOP. Include a list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The PRDOLHR will provide the opportunity for all interested parties to review and comment on the draft AOP. The organizations listed below will receive the draft AOP and invited to comments. As the program year progresses and the needs of the agribusiness community evolves, the PDOLHR will continue to work with partners of the agricultural community to explore new approaches to meeting the demands of Puerto Rico's expanding agricultural industry through collaborative agreements.

The following organizations will receive the draft AOP:

a. Puerto Rico Department of Education (PRDE) / Migrant Education Program.
b. Puerto Rico Farmworker Health Program.
c. Puerto Rico Legal Services Farmworker Division.
d. Puerto Rico Department of Agriculture.
e. Department of Export and Commerce (PRDEDC) / WDP.
f. PathStone Corporation.
g. USDOL Wage and Hours Division.

(C) *Data Assessment*. Review the previous four-year Wagner-Peyser Act data reports on performance. Note whether the State has been meeting its goals to provide MSFWs with quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes that such goals were not met, and how the State intends to improve its provision of services to meet such goals.

The PRIS system is being enhanced to add additional functionality and make it more in compliance with the ARS system and to better record services to

MSFWs to comply with the Equity Ratio Indicators (ERIs). Changes to the system are expected to be in place by June 30, 2024.

The table below shows actual data taken from WIPS regarding the registration of MSFWs during PY2020, PY2021 and PY2022. The effect of the Covid 19 pandemic was reflected in the data collection of 2019. As we can see, the number of MSFWs registered as of June 30, 2023, is very low when compared to non-MSFWs.

Program Year	Non-MSFW	MSFWs
PY2020	5,566	59
PY2021	8,111	198
PY2022	11,674	268
Total	25,351	525

Policies and procedures were put in place to address this situation and for the proper classification of MSFWs in the PRIS system. Changes are to be made to the system to automate this process by including the required questions and as they are being answered by WP staff, the system will complete both elements 413 and 808. These changes are projected to be completed by June 2024. The goal is to comply with program regulations and to resolve findings in previous monitoring reports and to be able to capture the must number of MSFWs as possible in the system.

Given the above scenario, corrective actions must be taken to:

- Ensure MSFWs are registered in Wagner-Peyser and classified appropriately.

- Ensure services to MSFWs are entered appropriately into the PRIS System.
- Ensure Outreach Workers are not only reaching out to MSFWs but providing the services they are entitled to.

(D) *Assessment of progress*. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved, an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps in achievement in the coming year.

MSFWs contacted by outreach activities.

For the period of July 1, 2020, to June 30, 2022, the current AOP plan calls for at least 11,520 MSFWs. During the same period a total of 7,047 MSFWs were contacted. This is 4,473 contacts less than the planned of 11,520 MSFWs to be contacted. This was since in PY2022, two out of the five Outreach workers resigned. This impacted the total MSFWs to be contacted during this AOP period of performance.

We are committed to continue reinforcing the Outreach Program to comply with regulations as required by 20 CFR 653.107, which requires PRDOLHR to operate an Outreach Program to reach farmworkers that for different reasons normally did not reach ES local offices. Once the vacant positions are filled out, ES will be in position to provide the whole range of services to MSFWs dwelling in the significant agricultural areas and to increase the number of MSFWs served and provide outreach services to more than half the population of farm workers that at this time cannot be reached.

Equity Performance Indicators

The lack of performance data from the PRIS System and the failure of local offices to appropriately classify MSFWs in the system are the main barriers

to properly identify if Puerto Rico complies with the equity performance indicators. PRDOLHR is committed to working closely with and assessing the conditions that unable ES to meet the performance goals for MSFWs. This assessment will be the basis for a corrective action plan that allows the ES to meet the performance standards for MSFWs and ensure they are receiving services quantitively proportionately as compared to non-MSFWs.

Referral of MSFWs to interstate agricultural job orders:

The number of MSFWs interested in applying to agricultural jobs in the mainland has decreased in the past years. Several factors have contributed to this as explained in Section E (2), such as the Promotion of Jobs Abroad Program under P.L. 87 which provides better job conditions and the possibility of permanent relocation. The few MSFWs referred to interstate agricultural job orders are those we were recalled by their previous employers.

(E) *State Monitor Advocate*. The plan must contain a statement confirming that the State Monitor Advocate reviewed and approved the AOP.

A new SMA was designated. A copy of this plan will be provided to the SMA for review and approval.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:	
1.	The Wagner-Peyser Act Employment Service is co-located with one-stop centers, or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (Sec 121(e)(3));

	As of the date of this State plan, all Wagner-Peyser Employment Service Local Offices are co-located with One-Stop Centers and is in full compliance with the requirement set forth in Sec. 121(e)(3).
2.	If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements; The PRDLHR is committed to comply with 20 CFR 653.111. As of the date of this State Plan four Outreach Worker positions are vacant in significant MSFW One-Stop Centers (Southeast Local Area, AMSI Guayama, Mayagüez/Las Marías, and North Central local areas. Efforts to fill the vacant positions are underway. We expect to have these vacancies filled on or before March 31, 2024.
3.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and DWPs and Youth Programs under Title I; and State Vocational Rehabilitation (VR) agency is a workforce system partner and as such it has presence in the American Job Centers. The VR staff is cooperative with all workforce system partners at the American Job Centers providing services to individuals with disabilities referred by other core partners in the Center.
4.	SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans;

	5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within five calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wish to withdraw its request for hearing in writing before the hearing.
5.	The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM
PLAN MODIFICATION 2026-2028, PUERTO RICO ADULT EDUCATION PROGRAM

(a) Aligning Content Standards

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

The Puerto Rico Department of Education (PRDE), through the Assistant Secretary for Alternative Education and the Adult Education Program (AEP), serves as the eligible agency responsible for the implementation of Title II of the Workforce Innovation and Opportunity Act (WIOA).

The curriculum standards are a pillar. For Program Years 2026-2028, the AEP will continue to refine and fully implement standards-aligned curricula that integrate:

- College and Career Readiness (CCR) Standards for Adult Education.
- Workforce preparation skills aligned with in-demand occupations.
- Digital literacy competencies.
- English language acquisition standards; and
- Contextualized instruction models connected to career pathways.

Strengthened Alignment with Workforce and Industry Needs: the DE-AEP will be In alignment with the federal emphasis on industry-driven strategies, following the federal priorities identified in the Five Strategic Pillars, detailed in AMERICA'S TALENT STRATEGY. The Program will work toward the efforts to integrate existing workforce development systems to maximize efficiency and effectiveness, provide accountability for workforce training programs, upskill incumbent American workers, and develop alternatives new credentials. The AEP will ensure that academic content standards are not implemented in isolation but are delivered within instructional frameworks that connect foundational skills development with occupational relevance. Curriculum alignment will support adult learners' transitions into Integrated Education and Training (IET) programs, post-secondary education, Registered Apprenticeships, and employment in high-demand sectors.

Standards implementation will emphasize the following: Contextualized mathematics, reading, and writing instruction embedded within workforce preparation activities; integration of problem-solving, adaptability, communication, collaboration, and technology use; alignment of instructional objectives with labor market information and regional workforce priorities; and incorporation of transferable skills necessary for economic mobility.

Curriculum Implementation and Faculty Development: To ensure high-fidelity implementation of aligned standards, the AEP will maintain a structured professional development system that includes:

- Academic facilitators are assigned to core instructional areas to provide statewide technical assistance.

- Training for instructors in standards-based instruction, assessment indicators, and curriculum integration.
- Professional development on career pathways alignment, artificial intelligence (AI) literacy, and workforce preparation.
- Specialized training to address the instructional needs of adults with disabilities and English language learners; and
- Capacity building for instructional strategies that support concurrent academic and occupational skill development.

Professional development will incorporate research-based adult learning principles and instructional practices consistent with the essential components of reading instruction and scientifically valid research.

Continuous Curriculum Review and Improvement: The AEP will maintain a continuous curriculum review process to ensure responsiveness to learner outcomes and labor market shifts. This process includes:

- Instructor feedback logs and structured curriculum review cycles.
- Regular meetings of curriculum review committees composed of instructional staff.
- Analysis of student performance data to inform curriculum refinement.
- Updates to workforce preparation and career pathways components as labor market demands evolve.

This approach ensures that academic content standards remain rigorous, relevant, and aligned with both postsecondary expectations and employer-defined skill requirements.

Consistent with the Industry-Driven Strategies priorities of ETA and USDE for the workforce system to transform it into a reliable pipeline of American talent led by industry and aligned with America's economic priorities, the Puerto Rico Department of Education (PRDE) Adult Education Program will emphasize the alignment of curriculum and all other Title II activities with employer needs, aiming to reduce the lack of coordination between education systems, workforce agencies, and businesses. The main goal will be to prioritize industry needs and align WIOA Title II workforce program with private sector training investments and evolving skill demands.

In general, to evaluate the curriculum effectiveness the AEP will maintain a continuous teachers log system of feedback annotations on curriculum improvement needs as per students' interactions in the lessons and activities. A committee selected from teachers implementing the curriculum will meet regularly to discuss the log notes and plan for future improvements to the curriculum.

(b) Local Activities

Describe how the eligible agency will use 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.

Local activities will be focus in promote worker mobility as per required by Pillar II in American Talent Strategy, including the innovative use of technology and labor market data, to promote workforce support and attain economic mobility to high-wage jobs and career paths.

Multiyear Competition Process: The Puerto Rico Department of Education, Adult Education Program (PRDE-AEP), conducts a full and open multiyear competition for the award of Title II funds in accordance with WIOA Sections 231, 225, and 243, and consistent with 34 CFR 463 Subpart C. The multi-year competition process ensures direct and equitable access to funds for all eligible providers and is designed to promote program quality, industry alignment, accountability, and responsiveness to regional workforce needs.

Who are eligible individuals and providers?: The Adult Education Program recognizes adult learners as participants in the broader workforce development system and will ensure that services are designed to promote educational advancement, economic mobility, and transition to employment in in-demand industries. Service providers will deliver services to eligible individuals who have attained at least 16 years of age, are not enrolled, are required to be enrolled in a secondary school

under the Puerto Rico law, lack basic skills, do not have a secondary school diploma or its recognized equivalent, or are English language learners. Organizations eligible to apply for funding must have demonstrated effectiveness and comply with the 13 considerations established by WIOA in providing adult education and literacy services. These organizations include local education agencies, community-based organizations or faith-based organizations, volunteer literacy organizations, institutions of higher education, public or private non-profit agencies, libraries, a public housing authority, a non-profit institution that has not been described previously in this paragraph and has the ability to provide adult education and literacy activities to eligible individuals, a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described previously, and a partnership between an employer and an entity described previously. Other organizations that meet the criteria of demonstrated effectiveness under AEFLA, in accordance with the provisions of 34 CFR 463.23.

The use of the thirteen considerations Of WIOA in funding eligible providers: The PRDE's- AEP, will fund each eligible provider using the considerations specified in section 231(e) of WIOA, to establish or operate programs that provide any of the adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. Organizations interested in funding to provide services must complete RFP to solicit funding. When completing the RFP, they must provide evidence that complies with the 13 Considerations of WIOA to be eligible providers and be granted funding.

Competitive Grant Structure: Under the current and upcoming grant cycle (2026–2028), the PRDE-AEP will continue implementing the four-year multiyear competition structure consisting of:

- An initial one-year grant award.
- Continuation awards for up to three additional years, contingent upon demonstrated effectiveness, compliance with fiscal and programmatic requirements, and availability of federal funds.

Continuation funding is not automatic and is subject to:

- Achievement of negotiated performance targets under WIOA Section 116.

- Demonstrated progress in measurable skill gains.
- Alignment with local workforce development board (LWDB) plans.
- Compliance with fiscal integrity standards; and
- Satisfactory monitoring outcomes.

This structure ensures both program stability and accountability.

Promotion of Industry-Driven and Career Pathways Strategies: In alignment with federal priorities emphasizing industry-driven workforce development, the multiyear competition requires applicants to demonstrate how proposed activities:

- Align with local and regional labor market information.
- Support career pathways connected to in-demand occupations.
- Integrate adult education with workforce preparation and Integrated Education and Training (IET).
- Coordinate with employers and workforce system partners; and
- Contribute to economic mobility for individuals with barriers to employment.

Applicants must clearly describe how instructional activities will connect adult learners to recognized postsecondary credentials, apprenticeship opportunities, or employment pathways in high-demand sectors within the local workforce area.

Promotion of AI literacy in adult education: The Adult Education Program will incorporate artificial intelligence (AI) literacy as a core component of workforce preparation activities, equipping adult learners with the foundational knowledge and practical skills needed to navigate an increasingly AI-driven labor market. Participants will engage in structured learning activities designed to develop an understanding of AI concepts and terminology, the responsible and ethical use of AI tools in workplace settings, and the application of AI-powered platforms for job searching, resume development, and occupational skills enhancement. These activities will be integrated into career pathways instruction and Integrated Education and Training (IET) models to ensure that adult learners are prepared to meet the evolving digital skill demands of in-demand industries and to support their transition to employment, credential attainment, and long-term economic self-sufficiency.

Demonstrated Effectiveness Requirement: All applicants must demonstrate effectiveness in improving the literacy skills of eligible individuals, consistent with WIOA Section 231(e) and 34 CFR 463.24. To be considered for funding, eligible providers must demonstrate:

- Capacity to deliver high-quality adult education and literacy activities.
- Ability to serve individuals with barriers to employment.
- Data management systems capable of reporting performance outcomes under Section 116.
- Commitment to integrating services within the local workforce development system.

Providers must describe how proposed activities will:

- Support career pathways aligned with regional labor market demand.
- Incorporate workforce preparation, digital literacy and artificial intelligence (AI) skills.
- Offer integrated education and training (IET), where appropriate.
- Coordinate with one-stop partners and post-secondary institutions.
- Facilitate transitions to recognized credentials and employment.

Applicants previously funded under Title II must submit National Reporting System (NRS) data reflecting performance against state-adjusted levels for primary indicators under Section 116. Applicants not previously funded must provide verifiable performance data demonstrating effectiveness in serving individuals with basic skills deficiencies in reading, writing, mathematics, and English language acquisition. Applications that do not meet the demonstrated effectiveness threshold will not be considered for funding. There are two methods for an eligible provider to meet the following requirements:

1. An eligible provider that has received funds under Title II of the WIOA must provide the National Reporting System (NRS) performance data required in Section 116 of WIOA to demonstrate past effectiveness.
2. An eligible provider who has not previously received WIOA Title II funding must provide performance data to demonstrate past effectiveness in serving eligible individuals deficient in basic skills in all the following areas: Reading, Writing, Mathematics, and Learning English.

To meet the effectiveness requirements demonstrated, applicants must submit their performance records and results. All applicants must complete a Past Effectiveness Data Table to determine their demonstrated effectiveness. Each application is reviewed to determine whether it meets the standard of demonstrated effectiveness. Applications that did not provide sufficient evidence of demonstrated effectiveness for two years were eliminated from the competition. The following results will be used to determine the effectiveness of the eligible educational service providers:

1. Number of eligible people served who are deficient in the basic skills of Reading, Writing, Math, and English
2. Achievement of high school diploma/equivalent
3. Transition to post-secondary education and training.

To meet the effectiveness requirements demonstrated, applicants must submit their performance records and results. All applicants must complete a Past Effectiveness Data Table to determine their demonstrated effectiveness.

Applicants Previously Funded Under Title II: Eligible providers that have received Title II funding in the preceding program years must submit National Reporting System (NRS) performance data demonstrating past effectiveness.

Applicants Not Previously Funded Under Title II: Applicants that have not previously received WIOA Title II funding must submit verifiable performance data demonstrating past effectiveness in serving eligible individuals with basic skills deficiencies. Applicants must provide sufficient documentation to demonstrate successful educational outcomes over at least two program years or other comparable evaluation periods. Data must be reliable, documented, and capable of validation.

Alignment with Performance Accountability Framework: Demonstrated effectiveness requirements are directly aligned with the primary indicators of performance described in WIOA Section 116. Providers must show capacity to contribute to statewide performance goals, including:

- Measurable skill gains.
- Credential attainment.

- Employment in the second and fourth quarters after exit.
- Median earnings after exit.
- Effectiveness in serving employers.

This alignment ensures that funding decisions reinforce accountability and promote continuous improvement across the adult education system.

Continuous Performance Monitoring: Demonstrated effectiveness is not limited to initial eligibility. Providers receiving funding must maintain satisfactory performance throughout the grant period. Continuation awards are contingent upon:

- Meeting or exceeding negotiated performance targets.
- Compliance with data reporting requirements.
- Participation in monitoring and corrective action processes when necessary.

Providers failing to demonstrate sustained effectiveness may be subject to technical assistance requirements, corrective action plans, or non-renewal of continuation funding.

Service to Individuals with Disabilities and Barriers to Employment: The PRDE-AEP will evaluate the provider's demonstrated ability to serve individuals with disabilities, including learning disabilities, and other individuals with barriers to employment. Applicants must describe: Reasonable accommodation policies and instructional adaptations and support services.

Program Quality, Instructional Intensity, and Research-Based Practices: Applicants must demonstrate that proposed programs:

- Are of sufficient intensity and duration to achieve measurable learning gains.
- Incorporate the essential components of reading instruction, as appropriate.
- Use instructional practices grounded in scientifically valid research.
- Integrate contextualized instruction that links foundational skills with workforce preparation.

The PRDE-AEP will prioritize programs that integrate adult education with workforce preparation and occupational training through Integrated Education and Training (IET) and career pathways frameworks.

The "continuation award" process

The continuation of the award process is as follows: If an eligible service provider is approved and funded, it will receive an initial one-year grant. After the first-year grant, the PRDE can provide a continuation grant for up to three additional years. Continuation grants are subject to demonstrate effectiveness in service delivery. Furthermore, they are subject to the availability of grant funds. After the four-year period, the PRDE may complete a new competition. The PRDE may also extend the competition during an ongoing period if it is considered appropriate and necessary to serve a particular region or rural area where no service providers have shown in or been approved, and no services have been provided for disadvantaged individuals and population groups. An eligible provider can meet these requirements in two ways:

1. An eligible provider that has been funded under Title II of the WIOA must provide the NRS performance data required under Section 116 of the WIOA to demonstrate past effectiveness.
2. An eligible provider that has not been previously funded under Title II of WIOA must provide performance data to demonstrate its past effectiveness in serving eligible individuals with basic skills deficiency in all the following areas: reading, writing, mathematics, and English language acquisition.

The following outcomes will be used to determine the effectiveness of eligible education service providers:

1. The number of eligible individuals who were deficient in basic skills such as reading, writing, math, and English language skills.
2. Attainment of secondary diploma/equivalent
3. Transition to post-secondary education and training.

The following will not be considered eligible applicants: Applicants that are not in compliance with the Civil Rights Act of 1964 or those applicants that discriminate based on nationality, origin, race, gender, religion, or handicap, sexual orientation, or gender identity, political or religious ideology, disability or physical or mental disability, being a victim of domestic violence, sexual aggression, or stalking. As required by federal regulations, service providers are prohibited from using federal

funds to supplant state or local dollars. All federal funding will be used to enhance learner services, as outlined in this Plan. The Adult Education program will conduct competitions under WIOA upon receiving guidance from the USDOE, Office of Career, Technical and Adult Education (OCTAE). Awards to eligible providers will be made available through a Request for Proposal (RFP) application process. To help ensure direct and equitable access to funds for adult literacy and basic skills activities, RFP's will be announced directly to providers and through the regional media. In addition, all providers are considered for grants based on the same criteria. These criteria are aligned with the requirements in this Plan and the thirteen (13) considerations required by WIOA federal legislation.

Providers' grants distribution criteria

The PRDE's Adult Education Program uses the following parameters to distribute funds to approved applicants:

1. No less than 82.5 percent of the grant funds will be used to award grants and contracts under Section 231 and to conduct Section 225, of which no more than 20 percent of such amount shall be available to conduct Section 225.
2. Shall not use more than 12.5 percent of the grants to conduct State Leadership activities under Section 223.
3. Shall not use more than 5 percent of the grant funds, or $85,000, whichever is greater, for the administrative expenses of the eligible agency.
4. Every effort is made to select at least one eligible provider for each local area of the workforce system in Puerto Rico.

Providers' grants will be distributed based on the ability to meet the following AEFLA purposes outlined in WIOA:

1. Assist adults in becoming literate and obtaining the knowledge and skills necessary for employment and economic self-sufficiency.
2. Assist adults who are parents or family members to become full partners in the academic development of their children.
3. Promote the transition from adult education to post-secondary education and training through career pathways.
4. Assist adults in completing high school and holding a diploma or equivalent certificate.
5. Assist immigrants and English language learners to improve reading, writing, math, and comprehension of the English language and acquire an understanding of the American government, individual freedom, and responsibilities of citizenship.

Expansion of Access and Geographic Coverage: The PRDE-AEP will utilize the multiyear competition process to ensure that services are accessible across all Local Workforce Development Areas (LWDAs), including rural and underserved communities. The Request for Proposals (RFP) will be widely disseminated across all workforce regions to encourage participation from qualified eligible providers capable of expanding access, particularly in areas with limited-service availability or underserved populations. The AEP will prioritize ensuring that at least one eligible provider operates in each local workforce area, consistent with statutory requirements.

How Applications will be reviewed for local plan alignment: Integration with Local Workforce Development Boards: As required under 34 CFR 463.21, all applications will be submitted to the appropriate Local Workforce Development Board(s) for review and comment to ensure consistency with local plans. If a proposed service area spans multiple local workforce regions, applications will be submitted to each corresponding Local Board for feedback. Recommendations from Local Boards will be considered in final award determinations, particularly where they: Identify alignment gaps; recommend adjustments to better serve regional workforce needs; or suggest enhanced coordination with one-stop partners.

The recommendations will be analyzed and incorporated whenever appropriate if they demonstrate alignment with regional needs as identified in the local workforce development plan

and serve individuals in the community who were identified in such a plan as most in need of adult education and literacy activities.

As described previously in this section, the PRDE's- AEP will fund each eligible provider using the 13 considerations specified in section 231(e) of WIOA to establish or operate programs that provide any of the adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently.

Innovation and Program Modernization: Consistent with TEGL 05-25 and federal guidance promoting flexibility and innovation, the PRDE-AEP encourages applicants to incorporate:

- Technology-enhanced instructional delivery.
- Hybrid and distance education models.
- Accelerated and concurrent instructional strategies.
- Employer-informed curriculum design; and
- Evidence-based models that improve participant outcomes.

Innovation proposals must remain compliant with AEFLA statutory requirements and demonstrate measurable impact on student performance and workforce outcomes.

Equity, Access, and Non-Discrimination: All eligible providers must comply with applicable federal and state civil rights laws and demonstrate commitment to equitable access for individuals regardless of race, gender, national origin, age, disability, or other protected status. Providers must describe how reasonable accommodations will be provided to individuals with physical, mental, or learning disabilities, consistent with WIOA Section 231(e)(2) and Section 427 of the General Education Provisions Act (GEPA).

Commitment to Integrated Service Delivery: Consistent with the Puerto Rico Unified State Plan, eligible providers will serve as active partners within the local workforce system. Providers are expected to coordinate with: American Job Centers (One-Stop Centers); Workforce development boards; post-secondary education institutions; Career and technical education programs;

Community and social service agencies; and Employers and industry sector partners. Through this integrated approach, Title II services will contribute to a unified workforce strategy that prepares adult learners for participation in high-demand sectors and supports long-term economic self-sufficiency.

Responsiveness to Regional and Workforce Needs: The PRDE-AEP will evaluate the extent to which each applicant demonstrates responsiveness to:

- Regional needs identified in the applicable Local Workforce Development Board (LWDB) plan.
- Populations most in need of adult education and literacy services, particularly individuals with low literacy levels and English language learners.
- High-demand industry sectors and occupations identified through state and local labor market information.

Applicants must demonstrate clear alignment between proposed services and the economic and workforce priorities of the local area, including career pathways connected to in-demand occupations.

Effective Use of Technology and Innovative Delivery Models: Consistent with federal guidance encouraging modernization and innovation, the PRDE-AEP will assess the extent to which providers: Utilize technology and distance education effectively; Expand access through hybrid or flexible instructional models; Strengthen digital literacy skills among participants and demonstrate that technology use contributes to improved learning outcomes. Technology implementation must support instructional quality and measurable performance improvement.

Coordination with Workforce and Community Partners: Applicants must demonstrate meaningful coordination with: American Job Centers and WIOA core partners; Post-secondary education and training providers; Employers and industry associations and Social service agencies providing supportive services. Strong partnerships must support career pathways development, participant referrals, and transition to employment.

Flexible Scheduling and Support Services: Providers must offer flexible schedules and coordinate with available support services, such as childcare, transportation, and career counseling, to enable participation and program completion.

Data Management and Continuous Improvement: Each applicant must demonstrate the capacity to:

- Maintain high-quality data systems.
- Accurately report measurable outcomes.
- Use performance data to inform program improvement.
- Participate in monitoring and evaluation activities conducted by the PRDE-AEP.

English learners: For areas demonstrating need for English language acquisition applicants must document community demand and describe how services will address these needs.

Review Monitoring, Corrective Action and Technical Assistance: Providers identified as high-risk due to performance deficiencies, fiscal irregularities, or compliance concerns may be subject to additional monitoring and technical assistance. If a provider fails to meet performance expectations or compliance requirements, the PRDE-AEP may require:

- Submission of a corrective action plan.
- Participation in targeted technical assistance.
- Enhanced reporting requirements.
- Performance improvement benchmarks within a specified timeframe.

Failure to demonstrate improvement may result in reduction, suspension, or non-renewal of continuation funding.

Availability of Funds: Continuation awards are also subject to: Federal appropriations; State-level allocation determinations and Compliance with statutory funding limitations for Sections 231, 225, 243, and 223. The PRDE-AEP reserves the authority to adjust award amounts based on performance, demonstrated need, geographic coverage requirements, and federal funding levels.

Ensuring Service Continuity and System Stability: The continuation award process is designed to balance program stability with accountability. While the multiyear framework promotes continuity of services to adult learners, it ensures that public funds are directed toward providers

demonstrating measurable results and alignment with workforce system priorities. The PRDE-AEP retains authority to initiate a new competition at the conclusion of the four-year cycle or earlier if necessary to ensure adequate geographic coverage, address unmet regional needs, or strengthen service delivery in underserved communities.

Statutory Allocation Requirements: In compliance with WIOA funding limitations, the PRDE-AEP will allocate funds as follows:

- Not less than 82.5 percent of the grant funds will be used to award grants and contracts under Section 231 and to carry out Section 225 activities, of which not more than 20 percent of such amount may be used for correctional education and education for other institutionalized individuals under Section 225.
- Not more than 12.5 percent of the grant funds will be used to carry out State Leadership activities under Section 223.
- Not more than 5 percent of the grant funds, or $85,000 (whichever is greater), will be used for State administration, as permitted under WIOA.

These allocations ensure compliance with federal law while maintaining the capacity to support leadership, oversight, and system improvement.

Geographic Distribution and Access: The PRDE-AEP will make every reasonable effort to ensure that at least one eligible provider operates in each Local Workforce Development Area (LWDA) in Puerto Rico, consistent with statutory assurances. Grant distribution decisions will consider: Demonstrated need within the local area; Population density and service demand; Availability of qualified eligible providers and Coverage of rural or underserved communities. The goal is to ensure equitable access to adult education services across the Commonwealth.

Alignment with AEFLA Statutory Purposes: Funds awarded to eligible providers must support the purposes of the Adult Education and Family Literacy Act (AEFLA), including:

- Assisting adults in becoming literate and obtaining the knowledge and skills necessary for employment and economic self-sufficiency.

- Supporting parents and family members in becoming full partners in the educational development of their children.
- Promoting transition from adult education to postsecondary education and training through career pathways.
- Assisting adults in attaining a secondary school diploma or recognized equivalent.
- Assisting English language learners in achieving proficiency in reading, writing, speaking, and comprehension of the English language, while understanding the rights and responsibilities of citizenship.

Performance-Informed Funding Decisions: In addition to statutory compliance, grant distribution decisions will be informed by:

- Demonstrated effectiveness and past performance outcomes.
- Capacity to meet negotiated state performance targets under Section 116.
- Implementation of career pathways and Integrated Education and Training (IET).
- Alignment with regional labor market priorities.
- Quality of proposed instructional design and service integration.

The PRDE-AEP reserves the authority to adjust award amounts based on performance, service capacity, geographic coverage, and available funding.

Fiscal Integrity and Supplement-Not-Supplant: All awarded funds must comply with: The supplement-not-supplant requirement under Section 241(a) of WIOA; Federal cost principles and audit requirements; Buy American Act provisions, as applicable and Civil rights and nondiscrimination laws. Providers must demonstrate fiscal accountability, internal controls, and capacity to manage federal funds responsibly.

Productivity Principles in Service Delivery by Approved Applicant Activities. The AEP will implement the following productivity principles:

1. The delivery of adult education and literacy activities concurrently and contextually, with both workforce preparation activities and workforce providers for a specific occupation or occupational cluster.

2. Delivery of programs that provide participants with contextualization of English language acquisition with employability, workplace, and financial literacy skills, as described in Sec. 129(b)(2)(D) of the WIOA, under the individual career services category.
3. Fostering the requirements of collaborative agreements and formal partnerships as part of the service provider grant application. If an eligible provider does not have the financial and staff resources to provide comprehensive instructional and support services on their own, they must document how they will partner with other adult education providers and partner agencies to fulfill the career pathway plan components and the Thirteen Considerations of WIOA.
4. The delivery of services to adults who are English language learners fully implementing Integrated English Literacy and Civics Education (IEL/CE) is described below: (1) integration of civics engagement skills into career pathways and workforce preparation activities, including professionals with degrees and credentials; (2) integration of educational technology and hybrid learning (blended learning) models into civics educational activities, including the use of technology and social media to increase learner opportunities for responsible civic engagement; and (3) training and technical assistance on research and evidence-based instructional strategies.

Integration with Workforce and Career Pathways: Productive service delivery requires alignment with workforce system priorities. Providers must ensure that instructional activities: support career pathways linked to in-demand sectors; prepare participants for Integrated Education and Training (IET); promote transition to credential-bearing programs and coordinate with workforce partners to support employment outcomes. This integration strengthens the contribution of Title II services to Puerto Rico's unified workforce development system.

Technology and Innovation in Service Delivery: Consistent with federal guidance encouraging modernization, providers are encouraged to implement distance and hybrid instructional models; digital learning platforms; technology-supported assessment and progress tracking and flexible service models that expand access for working adults. Technology use must support measurable learning outcomes and comply with data reporting requirements.

Activities under Integrated Education and Training (IET): The PRDE-AEP prioritizes the delivery of Integrated Education and Training (IET) models that combine adult education, workforce preparation, and occupational training concurrently and contextually. IET programs are designed to accelerate participants' attainment of postsecondary credentials and employment in in-demand sectors, consistent with WIOA Section 203(9) and applicable federal guidance. Adult Education Program (PRDE-AEP) recognizes Integrated Education and Training (IET) as a primary strategy for aligning adult education with workforce development and economic mobility objectives. Consistent with Section 203(11) of the Workforce Innovation and Opportunity Act (WIOA), Integrated Education and Training is defined as a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Core Components of IET: All IET programs funded under Title II must include the following three required components, delivered concurrently and in a coordinated manner:

1. Adult education and literacy activities.
2. Workforce preparation activities; and
3. Workforce training aligned with a specific occupation or occupational cluster.

These components must be integrated into instructional design and scheduling to ensure that participants receive contextualized instruction that accelerates both academic skill development and occupational competency.

Alignment with Career Pathways and In-Demand Occupations: IET activities must align with career pathways frameworks that:

- Support attainment of recognized postsecondary credentials.
- Prepare participants for employment in in-demand industry sectors.
- Provide opportunities for wage progression and career advancement.

Eligible providers must demonstrate that IET programs are informed by local labor market information and aligned with Local Workforce Development Board (LWDB) priorities.

Where feasible, IET programs will coordinate with:

- Workforce training providers.
- Career and technical education programs.
- Postsecondary institutions.
- Registered Apprenticeship sponsors.
- Employers and industry sector partnerships.

Concurrent and Contextualized Instruction: IET instructional models must ensure that foundational academic skills are delivered in the context of occupational content. Programs must:

- Integrate reading, writing, mathematics, and English language acquisition with occupational terminology and tasks.
- Incorporate problem-solving, teamwork, digital literacy, and workplace readiness competencies.
- Utilize instructional approaches that accelerate participant progression through educational functioning levels.
- Scheduling structures must allow participants to engage in adult education and workforce training activities concurrently, reducing time to credential and employment.

Access and Equity in IET Participation: The PRDE-AEP will ensure that IET opportunities are accessible to individuals with barriers to employment, including:

- Adults with low literacy levels.
- English language learners.
- Individuals with disabilities.
- Individuals transitioning from correctional settings.

Providers must describe accommodation and support mechanisms to enable equitable participation and successful completion.

Performance Expectations and Outcomes: IET programs must contribute to measurable outcomes consistent with WIOA Section 116 indicators, including:

- Measurable skill gains.
- Secondary credential attainment, where applicable.

- Recognized postsecondary credential attainment.
- Employment outcomes.

Providers must demonstrate the capacity to track participant progress across academic and occupational components.

Expansion and Continuous Improvement of IET: For Program Years 2026–2028, the PRDE-AEP will continue to expand the availability and quality of IET offerings across Local Workforce Development Areas. Expansion efforts may include:

- Technical assistance to providers on IET design and implementation.
- Professional development on contextualized instruction.
- Strengthened coordination with workforce partners.
- Evaluation of IET outcomes to inform continuous improvement.

The PRDE-AEP will prioritize IET models that demonstrate measurable success in supporting participant transition to employment or postsecondary education.

Emphasis in recognized credentials: During 2026-2028, under the Unified Plan for Title II, the AEP will develop, at the local level, under local activities, with local eligible service providers, and several IET credentials projects through higher education university partners in high-demand occupations for the hospitality, health care, and business services industries. To address the findings of the new post-pandemic marketplace situation of hard-to-hire occupations, the AEP will expand the offering of activities under integrated Education and Training (IET) 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 for the purpose of educational and career advancement. Service providers will be required to develop 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. The industrial and service sectors and conglomerates to be targeted include manufacturing, health professions, technology, and the hospitality industry. In addition, the AEP will promote partnerships with accredited post-secondary and higher education

institutions to design and implement programs aimed at credentials for adult education clientele, providing concurrent basic education and occupational training.

Acceleration and Career Pathway Progression: Concurrent models are designed to reduce barriers that traditionally separate academic remediation from occupational training. This approach supports the Commonwealth's commitment to worker mobility by enabling adults to obtain credentials more efficiently while strengthening foundational skills.

Access and Equity Considerations: Concurrent models must be designed to ensure equitable access for individuals with barriers to employment, including individuals with disabilities and English language learners. Providers must describe accommodations, support services, and instructional adaptations that enable successful participation in both academic and occupational components.

Alignment with Workforce System Priorities: The PRDE-AEP ensures that local activities are responsive to workforce system priorities through structured coordination with Local Workforce Development Boards and workforce partners.

Local providers are required to demonstrate alignment with local workforce development plans; participation in American Job Center coordination efforts; integration with career pathways connected to in-demand sectors and strategies to support transition to credential-bearing programs and employment. This alignment strengthens the role of adult education as a core component of the Commonwealth's unified workforce development system.

Commitment to Equity and Access: All local activities are designed to ensure equitable access for individuals with disabilities, English language learners, and other individuals with barriers to employment. Providers must implement accommodation, flexible scheduling, and coordination with support services to enable meaningful participation and successful completion.

c. Correctional Education and Other Education of Institutionalized Individuals (WIOA section 102(b)(2)(D)(ii)(II)(bb)).

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: (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 with the goal of reducing recidivism.

The Puerto Rico Department of Education, Adult Education Program (PRDE-AEP), allocates funds for correctional education and education of other institutionalized individuals in accordance with Section 225 of the Workforce Innovation and Opportunity Act (WIOA).Not more than 20 percent of the 82.5 percent of funds reserved for local activities under Section 231 may be used to support correctional education and education for institutionalized individuals.

Purpose and Scope: Correctional education activities are designed to: Assist incarcerated individuals in attaining literacy skills and secondary credentials; Improve English language proficiency, where applicable; Develop workforce preparation competencies and support transition to postsecondary education, occupational training, and employment upon release. These services are intended to improve educational attainment, enhance employability, and support successful reintegration into the community.

Eligible Participants: Services under Section 225 are provided to individuals who are: incarcerated in correctional institutions; or confined in community-based residential facilities or other institutional settings. Participants must meet the definition of an eligible individual under Section 203(4) of WIOA.

How the PRDE Adult Education Program will award section 225 activities: The awards to service providers serving corrections and other institutionalized individuals will follow the same process as other service providers in the competition held. These service providers will participate in the same multi-year competition and must comply with the 13 considerations of the WIOA legislation and the demonstrated effectiveness criteria. The PRDE's AEP will reserve no more than 20 percent of its Federal grant received under WIOA to provide programs for corrections education and

education for other institutionalized individuals, as described in Section 225. Areas targeted through this program will include increased basic skills to obtain a high school diploma; readiness to transition successfully into the community and workforce; adults with disabilities literacy and adult secondary education skills; integration of digital literacy skills; English literacy courses; education and development of workforce preparation skills through coordination with vocational education; and use of the career pathway model for fostering a transition from correction facilities to employment and professional development for adult education teachers participating in correction programs through innovative strategies, which include the development of 21st century skills, STEM, and employability skills in a contextualized environment.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals, to conduct a program for criminal offenders within a correctional institution, must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. Section 225 (a) of WIOA states that, from funds made available under Section 221(a)(1) for a fiscal year, each eligible agency shall conduct corrections in education or education for other institutionalized individuals. The funds should be used for the cost of education programs for criminal offenders in correctional institutions, other institutionalized individuals, and other individuals, including programs for adult education and literacy services, special education as determined by the eligible agency, secondary school credits, 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.

Reentry and Transition Strategies: The PRDE-AEP emphasizes coordination between correctional education providers and community-based workforce and education partners to facilitate smooth transitions upon release. Reentry-focused strategies may include:

- Pre-release educational planning.
- Coordination with American Job Centers.
- Referral to postsecondary education or training programs.

- Enrollment in Integrated Education and Training (IET) programs post-release.
- Information sharing with community providers to support continuity of services.

These transition strategies are designed to reduce barriers to employment and promote economic self-sufficiency.

Continuous Improvement: The PRDE-AEP monitors correctional education programs through performance review, technical assistance, and corrective action procedures when necessary. Programs demonstrating strong educational and transition outcomes may be considered for continuation funding within statutory limits.

(d) Integrated English Literacy and Civics Education (IELCE)

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 Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA.

The PRDE-AEP will not provide IELCE activities under section 243 of WIOA.

Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Consistent with statement made in the previous sub-section, the PRDE-AEP will not provide IELCE activities under section 243 of WIOA.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Consistent with statement made in the previous sub-section, the PRDE-AEP will not provide IELCE activities under section 243 of WIOA.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such

adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Consistent with statement made in the previous sub-section, the PRDE-AEP will not provide IELCE activities under section 243 of WIOA.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to conduct the activities of the program.

Consistent with statement made in the previous sub-section, the PRDE-AEP will not provide IELCE activities under section 243 of WIOA.

(e) State Leadership (WIOA section 102(b)(2)(D)(ii)(III)).

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

The Puerto Rico Department of Education, Adult Education Program (PRDE-AEP), uses funds reserved under Section 223 of the Workforce Innovation and Opportunity Act (WIOA) to carry out State Leadership activities designed to strengthen the quality, effectiveness, and accountability of adult education services statewide. In accordance with statutory requirements, not more than 12.5 percent of the total Title II allocation will be used to support permissible State Leadership activities. State Leadership funds are used to build system capacity, enhance instructional quality, promote workforce alignment, and support continuous improvement across all Local Workforce Development Areas (LWDAs). The Adult Education Program (AEP) will work toward more Flexibility & Innovation in line with Pillars IV and V of the America Talent Strategy.

AI-driven economic transformation and Flexibility & Innovation. Consistent with description of AI literacy activities including previously under Local Activities section, the AEP will seek AI

transformation to adapt to workers new skills to share in the prosperity that AI will create. The AEP will promote flexibility and innovation, prioritizing AI literacy and skills development across the Adult Education Program developing pilot projects to drive rapid reskilling through AI-era innovations. New models of workforce innovation will be created to match the speed and scale of AI-driven economic transformation as AI is transforming work faster than the workforce system and workers will require new skills to share in the prosperity that AI will create. This pillar of the vision will be achieved by leveraging existing statutory authorities to promote flexibility and innovation, prioritizing AI literacy and skills development across the workforce system, and developing pilot projects to drive rapid reskilling and fuel other AI-era innovations.

The DEPR- AEP will perform the following specific **required activities** under Section 223, including:

1. Sign and implement a Memorandum of Understanding (MOU) with the Perkins Program. The purpose of the MOU is to establish a framework for coordination and collaboration among the Parties to support the development and implementation of a coordinated talent development system in Puerto Rico, in accordance with: (1) the Workforce Innovation and Opportunity Act (WIOA); (2) the Carl D. Perkins Career and Technical Education Act (Perkins V); and (3) the Puerto Rico State Plan for WIOA Title II state Plan. This MOU promotes the alignment of strategies, the reduction of duplication of efforts, and the strengthening of occupational pathways from education to employment. The MOU will be formalized pursuant to: (1) Sections 101, 102, 121, and 203 of WIOA; (2) Sections 122 and 124 of Perkins V; (3) federal guidance on Unified and Combined State Plans; and (4) applicable laws and policies of the Government of Puerto Rico. The Parties agree in the MOU to collaborate under the following principles: (1) Alignment of educational and workforce strategies; (2) Participant-centered service delivery; (3) Employer-driven program design; (4) Data-informed decision-making; (5) Efficient use of public resources; and (6) Continuous improvement.

2. Operate high-quality professional development programs to improve adult education instruction, including incorporating essential components of reading instruction, instruction related to the specific needs of adult learners, instruction provided by volunteers or other

personnel and dissemination of information about models and promising practices. The professional development activities will include artificial intelligence (AI) literacy.

3. Provision of technical assistance to local providers receiving funds including the development and dissemination of instructional and programmatic practices based on the best available research in reading, writing, speaking, mathematics, English language acquisition, distance education, and staff training. Promoting the role of local providers as one-stop partners and helping with the use of technology, including staff training, and improving efficiency.
4. Monitoring and evaluation of the quality of and improvement in adult education and dissemination of information about models and proven or promising practices within the State. State Leadership funds support system oversight and continuous improvement through:
    - Monitoring of local providers for compliance and performance.
    - Data analysis and reporting under the National Reporting System (NRS).
    - Risk assessment and performance review processes.
    - Development of corrective action plans when necessary.
    - Ongoing evaluation of program effectiveness.

6. Employer-based training activities in partnership with employers as a tool to help workers learn new skills and evolve within their companies or industries in small businesses in on-demand hospitality, tourism, and health occupations. Increased employer engagement would help the workforce system expand access to new industries and occupations, as well as increase the credibility of training in the business community. The ability to acquire training and skills at work provides an advantage for workers looking to improve their skills more easily and quickly.
7. Provide specialized professional training to teachers in the 21st Century, STEM, employability, and workforce preparation skills are important for competitiveness in the global labor market. The PRDE-AEP will provide ongoing professional development and technical assistance to eligible providers and instructors, including:
    - Training on College and Career Readiness (CCR) Standards implementation.
    - Support for Integrated Education and Training (IET) design and delivery.

- Development of contextualized instructional strategies aligned with workforce preparation.
- Training in digital literacy integration and technology-enhanced instruction.
- Support for serving individuals with disabilities and English language learners.
- Evidence-based instructional practices are grounded in adult learning research.

8. Update and expand the career pathways initiative: The DEPR-AEP will update and expand the implementation of the Career Pathways system during the 2026-2028 Unified Plan period. It is the goal to have 100% of eligible education providers centers island-wide in Puerto Rico certified with career pathways strategic plan tailored to their local needs. The career pathway initiative is under implementation, including the development of an individual employability plan for each participant with career pathway options. In addition, the AEP has initiated a process for registering participants in the One Stop American Job Center's to maximize the integration of services. The career pathways initiative will be expanded with the following goals:
   a) Making use of the Career Pathways Plan as a strategic planning tool that aligns and bridges training, education, employment, and supportive services at the local and state levels, partnering with employers, enabling individuals to move beyond adult basic education and succeed in post-secondary education, earn industry-recognized credentials, and advance along a career path.
      a. Integrating adult basic education and occupational skills training to enable individuals to increase their educational learning gains and earn industry-recognized credentials while completing basic skills training, as well as connecting the systems and structures that serve individuals with lower skills through mechanisms such as effective contextualized programs that result in increased mastery of basic skills and attainment of credentials that are relevant to employers. The AEP career pathways model will include partnerships with providers, including community-based organizations, community and technical colleges, human services and workforce agencies, and employers. The model

will be designed to allow entries, exits, and re-entries, depending on skill levels and prior training, employment prospects, and changing personal situations.

b. The AEP is aware of the existing gap between labor force skills and the needs of employers in many high-growth industries, including healthcare, technology, tourism, and manufacturing. This gap creates structural unemployment, while well-paying jobs go unfilled, and many low-skilled adults are trapped in low-wage jobs with little opportunity for career advancement. The career pathways model aims to address the economy's vital need for skilled workers while offering low-wage workers the opportunity to obtain education and training they need to succeed in the labor market. To achieve these goals, the career pathways approach offers low-skilled adults well-articulated training and employment ladders targeted at locally in-demand jobs combined with supportive services. This approach presupposes that post-secondary education, and training should be organized as a series of manageable steps, leading to successively better credentials and employment opportunities in growing occupations. Each step is designed to prepare participants for the next level of employment and education and to provide credentials with labor market value.

The PRDE-AEP ensures that leadership expenditures directly support system improvement rather than supplanting local provider responsibilities.

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

The DEPR-AEP will perform several permissible activities under Section 223, including technology instruction investments, curriculum development, achieving performance objectives, and transition to post-secondary education. The Adult Education Program (AEP), as previously detailed in the required activities section, will work toward more Flexibility & Innovation in line with Pillars

IV and V of the America Talent Strategy seeking match the speed and scale of AI-driven economic transformation and Flexibility & Innovation. As described under the required State Leadership activities above, the AEP will continue to advance AI literacy and workforce innovation initiatives. The following permissible activities further support this commitment and the broader workforce development objectives of the Program.

PRDE's- AEP will work collaboratively with other core programs and partner's agencies to expand access to education, training and employment opportunities for adults, people with disabilities and individuals facing barriers to employment, thus contributing to further our economic development. The AEP program will provide resources and services through One-Stop Centers that include orientation for Adult Education program opportunities, career pathways, transition resources, referral processes, and other joint mechanisms developed through agency partnerships. The PRDE Adult Education Program will develop the following permissible activities under Section 223 of the WIOA:

- Technology and Data System Enhancement and Fostering a Technology Culture. Foster a technological culture for the development and implementation of technology applications, translation technology, distance education, and professional development to support the use of instructional technology. Improving statewide infrastructure through: Enhancement of student data systems; strengthening reporting and data validation processes; supporting technology-enabled instruction and expanding distance education capacity where appropriate.

Technology investments will directly support performance improvement and administrative efficiency. Identifying and disseminating model programs and effective practices across providers, particularly in areas such as:

- Integrated Education and Training (IET).
- Concurrent academic and occupational instruction.
- Strategies for improving retention and measurable skill gains.
- Instructional innovations supporting digital literacy.

- prioritize AI literacy and AI use skills development across the workforce system and develop pilot projects to drive rapid reskilling and fuel other AI-era innovations.
- Preparation and setting of interactive classrooms in instruction centers.
- Incorporating the online public domain and subscription-based search platforms in interactive classrooms.
- Promoting the role of local providers as one-stop partners and helping with the use of technology, including staff training, and improving efficiency.
- Professional development activities will address strategies for overcoming connectivity challenges in virtual environments, selecting appropriate EdTech tools, and maximizing technology use during synchronous and asynchronous instruction.

DEPR-AEP will foster the development and implementation of technology applications, translation technology, distance education, and professional development to support the use of instructional technology. This activity will be performed in compliance with the criteria number seven (7) of the 13 considerations of WIOA, that requires to consider "whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education, is sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance". Considering this commitment, the DEPR-AEP will develop and implement the following activities:

a) Incorporation of Internet service technology into any remaining adult education classrooms without that service. DEPR-AEP will expand efforts to incorporate Internet technology into adult education classrooms. The internet has become a powerful tool for communication. It has revolutionized communication, to the extent where we utilize the Internet in everything we do. In education classrooms, the Internet breaks down communication barriers, as its portability enhances collaboration between students and teachers. Internet access is one of the important technologies in education; it allows the adult education clientele to connect to Internet technology without wires. The school Internet facilitates better education through dependable, secure, and supported wireless connectivity, which provides students and staff

with the ability to work and connect across all areas of the campus. Internet technology facilitates learning through distance education.

b) Preparation and setting of interactive classrooms in instruction centers. The AEP will continue to invest funds in developing interactive classrooms with smart boards, Internet access, learning platforms, online resources, and learning material libraries to enhance learning on any remaining adult education classrooms without that service. An interactive classroom fosters spontaneity and flexibility, allowing teachers to draw and comment on a wide variety of web resources. It allows teachers to save time in the classroom, print if necessary, including notes made during the lesson, reduce duplication of effort, and facilitate review. It can be used to conduct video conferences, attractive presentations, staff training, distance meetings, information sessions and group discussions. Therefore, it is also an excellent information technology and telecommunications (ICT) resource for teachers' professional development. Other benefits that teachers and students can find with the use of the interactive classroom is to have a tool that, in addition to the contents of the book, presents a technological combination in a reflective, contextualized, and strategic way, which gives students the possibility of access to critical and constructive education, in which each one is the manager of their own change and pedagogical progress.

c) Provision of portable notebooks in classrooms. The AEP will continue equipping classrooms with portable computers notebooks in any remaining adult education classroom without that service. Schools across the country have experimented by providing students with notebooks to facilitate learning. Providing students with notebooks for use in the classroom and at home improves their learning in several subjects, including science, math, and English. Students receive more feedback on their writing, editing, and revising their work more often, drawing on a wider range of resources to write, publish, or share their work with others. The benefits of using computer notebooks in adult education classrooms include the following:

- Fostering online collaboration with other students.
- Providing curriculum support and additional information to students.
- Promoting better organization: Notebooks help students keep track of their assignments and utilize online school calendars.

- Allowing students to receive and view assignments online and submit their work via e-mail rather than being required to print them.

d) Expansion of the distance education program: The AEP will expand the actual distance education program to provide the necessary space to allow teachers to boost the learning and skill gains of adult learners in geographical areas, including limited access or remote areas, in the mountain zones of Puerto Rico where the availability of education-eligible service providers is limited. The distance education strategy will include two modalities: blended (hybrid) distance education and full-distance education in a long-range stage, with emphasis on the last one. The distance education program initiative will provide the necessary space to allow teachers to boost the learning and skill gains of adult learners. The distance education strategy will include two modalities:

- blended (hybrid) distance education. This strategy uses a combination of face to face and online learning activities where computer-mediated activities replace "seat-time" in the classroom. It is the "blend" that makes each course unique; thus, blended/hybrid courses can take on different attributes, adjusted to the situation of each classroom and student.
- Full distance education in a long-range stage, in which education is provided without the teacher and students being physically present together at any or most part of the program.

The initiative will allow teachers to develop supplemental activities and materials, fill gaps and address skills as they become more familiar with the curriculum over time. AEP will promote the use of technology platforms for distance education. The AEP will promote a full-distance educational approach using technology platforms.

e) Collaboration with other core programs and partner agencies: PRDE's AEP will work collaboratively with other core programs and partner agencies to expand access to education, training, and employment opportunities for adult learners. The AEP will provide resources and services through American Job Centers (One-Stop Centers) including orientation about program opportunities, career pathways, transition resources, referral processes, and other joint mechanisms developed through agency partnerships. The Adult Education Program has

signed a memorandum of understanding (MOU) with the 16 American Job Centers (AJC) for collaboration and is, under the financial possibilities of the agency, contributing to infrastructure costs for the operations of the AJC. The AEP maintains a staff member on each of the 16 One-Stop Centers one day a week to evaluate potential adult education participants and make referrals to the adult education service providers approved by the AEP for services. These AEP employees make cross referrals between the One-Stop centers and the AEP service providers.

f) Activities under Integrated education and training: State leadership activities will support the statewide implementation and quality of Integrated Education and Training (IET) programs, as described previously in Section (b) of this Plan. Leadership funds will be used to provide technical assistance, professional development, and capacity building to eligible providers implementing IET models.

g) Promoting apprenticeship programs. The Adult Education Program will perform activities toward the expansion and integration of Registered Apprenticeship pathways in alignment with federal WIOA priorities and the Administration's goal of reaching 1 million active apprentices nationwide. To support this effort, the Adult Education Program will undertake the following activities:

- Apprenticeship Awareness and Outreach: Inform adult learners about Registered Apprenticeship opportunities available in Puerto Rico, with emphasis on in-demand occupations and sectors critical to economic competitiveness, including manufacturing, construction, healthcare, and technology.
- Pre-Apprenticeship and Work-Based Learning Integration: Incorporate pre-apprenticeship, internship, and other work-based learning models into program offerings as structured on-ramps to Registered Apprenticeships, prioritizing models that demonstrate strong labor market outcomes and clear progression toward employment.
- Alignment with Employer-Driven Standards: Coordinate with local employers, industry partners, and intermediaries to ensure that adult education instruction and workforce

readiness activities align with industry-approved apprenticeship program standards, enabling participants to transition seamlessly into apprenticeship programs.

- Referral to Registered Apprenticeship Programs: Establish and maintain referral protocols to connect eligible adult learners to Registered Apprenticeship sponsors, intermediaries, and joint labor-management partnerships operating in Puerto Rico.
- Data Tracking and Accountability: Track and report the share of program participants who transition into Registered Apprenticeships or work-based learning models, in accordance with federal performance accountability requirements under WIOA Title II.
- Coordination with State and Federal Partners: Collaborate with the Puerto Rico Department of Labor, the WIOA Title I programs, and Perkins V CTE partners to support a coordinated ecosystem that grows apprenticeship participation, reduces barriers to enrollment, and leverages federal funding strategically.
- Credential Attainment Support: Provide instruction and support services that prepare adult learners to meet the educational and skills requirements for apprenticeship entry, including digital literacy, occupational readiness, and recognized postsecondary credential attainment.

h) Update the Implementation effort of the College and Career Readiness Standards (CCR Standards). The College and Career ready standards are designed to be relevant to the real world, allow students to master more critical thinking and unique critical thinking skills, and reflect the knowledge, skills, and social foundations that our students need for success in both college and work. These standards require the implementation of the critical skills and knowledge expected by employers and are required for success in workforce training, post-secondary education, and employment. The College and Career Readiness Standards (CCR) for adult education presents a set of College and Career Readiness Standards that reflect the content most relevant to preparing adult students for success in colleges, technical training programs and transition to work. This effort will also promote English language acquisition and civic education. DE-AEP will also focus on updating the College and Career Readiness Standards

(CCR Standards) to link basic education for adults, post-secondary education, and the world of work.

i) Operating high-quality professional development programs: The DEPR-AEP is committed to developing high-quality professional development activities and support services that will help teachers and instructors better understand the career pathway systems and expand their professional knowledge.
   a) Professional development for career pathway updates. Areas and themes related to the development and delivery of career pathway systems that would help low-skilled adults transition into post-secondary education and employment or those with disabilities include the following:
   b) Design of Contextualized Instruction, including the STEM approach.
   c) Integration of employability skills into the classroom.
   d) Integration of career pathways into the curriculum framework of adult education programs.
   e) Integration of career counseling and planning into adult education.
   f) Focusing participants on career pathways.

j) Implementation of online professional development for teachers**:** The AEP will develop an online professional development program for adult education teachers. There are several benefits for adult education in the efforts for professional development for teachers: students have better learning outcomes and teachers learn better ways to teach, develop better organization and planning skills and gain knowledge. Online professional development adds flexibility to teachers. In an online class, teachers can work at their own pace and access classes at any time of the day from any working technical location. Online professional development provides an open schedule and great flexibility and can decrease stress for teachers and students. Online courses are typically more affordable than in-person ones. Technology reduces the cost of delivering professional development in several ways. Teachers can save money on gasoline, clothes, and books. The Department of Education can save money on

renting spaces, printed materials, and furniture. Therefore, it is an excellent choice for both parties to consider online professional development courses.

k) Provision of technical assistance to eligible providers of adult education and literacy activities: The plan for providing technical assistance to service providers will include the following:

- Technical assistance in curriculum thematic areas.
- Academic supervision offers mentoring and coaching in both the content and the andragogy process.
- Training and technical assistance for the integration of digital literacy skills into adult education and literacy activities.
- Training on the administration of pre- and post-tests standardized by the National Reporting System (NRS) and the descriptors of each level of functioning were used to measure educational gain and training on the monitoring of achievements of the core measures for the NRS.

l) Methodologies for the implementation of activities data analysis, evaluation, and career pathways development: The AEP will implement several methodologies for the implementation of activities data analysis, evaluation, and career pathways development. The data analysis will be focused on compliance with the following NRS requirements: the Assessment policies, NRS quarterly reports, NRS Data quality checklist for collecting and producing accurate and reliable data and the NRS annual narrative report, including activities evaluation of outcomes. The AEP Will also monitor on a regular basis the career pathways implementation strategy by reviewing the local career pathways plan developed and approved by the AEP for each local education service providers.

(f) Assessing Quality

The Puerto Rico Department of Education, Adult Education Program (PRDE-AEP), maintains a comprehensive quality assurance framework to ensure that adult education services funded under Title II are effective, compliant, and aligned with statewide workforce development goals.

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II.

Quality assessment integrates performance accountability, monitoring, technical assistance, data analysis, and continuous improvement processes.

Performance Accountability Framework: Program quality is evaluated in alignment with the primary indicators of performance established under Section 116 of the Workforce Innovation and Opportunity Act (WIOA), including:

- Measurable Skill Gains (MSG).
- Credential attainment.
- Employment in the second and fourth quarters after exit.
- Median earnings after exit.
- Effectiveness in serving employers, where applicable.

The PRDE-AEP establishes state-adjusted performance levels and monitors provider progress through quarterly and annual data reviews. Performance outcomes inform continuation funding decisions and targeted technical assistance.

Data Management and Reporting Integrity: Accurate and timely data reporting is essential to assessing program quality. All providers are required to:

- Maintain complete and verifiable participant records.
- Enter data into the state-approved management information system.
- Ensure compliance with National Reporting System (NRS) guidelines.
- Participate in data validation and review processes.

The PRDE-AEP conducts routine data quality reviews to identify discrepancies, reporting errors, or compliance concerns.

Monitoring and Risk Assessment:

The PRDE-AEP implements a structured monitoring system that includes:

- Annual risk assessments based on fiscal, administrative, and performance indicators.
- Desk reviews and on-site monitoring visits.
- Review of programmatic documentation and fiscal controls.
- Follow-up corrective action procedures when necessary.

Monitoring protocols are designed to ensure compliance with federal and state requirements while supporting program improvement.

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.

Continuous Improvement and Technical Assistance: Quality assessment is not limited to compliance review. The PRDE-AEP uses performance data and monitoring findings to guide continuous improvement efforts. Technical assistance may include:

- Targeted professional development.
- Instructional coaching.
- Data analysis training.
- Support in implementing Integrated Education and Training (IET).
- Guidance on improving measurable skill gains and retention strategies.

Providers demonstrating strong performance may serve as model sites for replication of effective practices.

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.

Evaluation of Instructional Effectiveness: Program quality also includes evaluation of instructional practices and program design. The PRDE-AEP assesses whether providers:

- Deliver instruction aligned with College and Career Readiness Standards.
- Implement contextualized and concurrent instructional models.
- Integrate workforce preparation and digital literacy competencies.
- Provide sufficient instructional intensity and duration to achieve learning gains.

Equity and Access Monitoring: The PRDE-AEP monitors equitable access to ensure that services are available to:

- Individuals with low literacy levels.
- English language learners.
- Individuals with disabilities.
- Individuals with barriers to employment.

Other quality assessment measures: To assess quality, the DEPR-AEP will enforce criteria number 3 of the 13 considerations of the WIOA, regarding the past effectiveness of the eligible education service providers in improving the literacy of eligible individuals. This follows the requirement of meeting state-adjusted levels of performance for the primary indicators of performance described in WIOA Section 116, especially with respect to eligible individuals who have low levels of literacy. In addition, all applications submitted for funding must comply with Section 231 and the stipulations of this Plan regarding the submission of applications. In addition to those included in the application, applicants must comply with the following requirements and activities implementation criteria:

1. Submit clear and measurable goals and objectives that promote higher student achievement and performance. Their performance levels must satisfy those established at the state level.
2. Demonstrate through measurable outcomes and performance measures, their past effectiveness in helping participants attain higher literacy skills, especially at the lowest levels of literacy.
3. Student performance, retention and promotion must be reported to the State, as might be required, through its new student information system.
4. Programs must be of sufficient intensity and duration; therefore, they must meet the requirements established by the State for programs that assist participants in attaining a high school diploma or in the transition to post-secondary education and training using career pathways. Sufficient intensity and duration must be demonstrated by an operational design that is appropriate for meeting the established performance measures. The

integration of prioritized literacy-based workforce preparation skills and digital literacy skills in the instruction delivered under the content domains will be strongly encouraged for all programs.

5. Programs must be based on adult education practices that are supported by the most rigorous or scientifically valid research available and the use of strategies that have proven to be effective and documented through research, such as career pathways, standard-based education and PRDE's adult education academic content standards.
6. Service providers must hold programs in a non-threatening environment where real-life and lifelong learning skills are promoted. These strategies are critical for participants in preparing productive and contributing members of the community for the global economy.
7. Professional development for all adult education program personnel must meet the high-quality standards established by the PRDE in terms of credit hours and intensity of training. PRDE supports adult educators in learning and applying practices based on the most rigorous or scientifically valid research available.
8. Local service providers must demonstrate how they will implement a memorandum of understanding (MOU) with all appropriate agencies such as universities, training programs, schools, employers, and other government agencies to effectively coordinate services for adults in their programs.
9. Local service providers must commit to providing all the required data to the PRDE and comply with the Student Information System. Student performance, retention and promotion must be reported to the State, as might be required, through the new student information system. This element is essential for tracking students and assessing their performance. Local providers will be trained for data collection and submission procedures and will be required to submit all the required data within the deadlines established by the Adult Education program.
10. Local service providers of English Literacy and Conversational English must substantiate the need for these programs in the community and describe how their programs will effectively address participants' needs and document program outcomes.

11. The Adult Education program encourages service providers to offer programs on a flexible schedule and ample support services to enable adults to attend and complete these programs. Workplace literacy providers must offer flexible schedules and locations to accommodate the needs of working adults. The Adult Education program promotes support services, such as childcare and transportation among local service providers.

Local providers will be accountable for meeting and complying with quality standards for the administration and instruction of basic adult education activities. The effectiveness of the programs, services and activities of funding recipients will be assessed through the DEPR Monitoring Division. The Division employs the following methods to assess programs and evaluate program improvement: data reviews, monitoring visits, on-site program reviews and self-assessment of program functions and performance. Any time a service provider is asked for a corrective action plan to improve in a particular area, AEP personnel will provide technical assistance and support to improve the quality of the adult educational activities of the service provider.

The monitoring of programs implementation: The AEP implements a monitoring process for program implementation activities. The monitoring process consists of three key components: ongoing, data-based desk audits, educational program reviews and on-site program monitoring.

1. The AEP state office will review a sample of programs for compliance with the WIOA requirements. Programs that score high on risk analysis for such things as having a new director, consistent late or incorrect reporting, not meeting objectives, or fiscal irregularities become priorities for monitoring. Programs that do not meet their responsibilities and/or objectives are provided with additional technical assistance to help them achieve full compliance.
2. The AEP Student Information System staff at the central office will regularly review student performance data and other program information. Programs receiving AEFLA or state funds must enter student data at least monthly into the managed student information system, our NRS compliant managed information system. Local programs must collect and

document student information regarding their goals, educational functioning levels, progress, and achievements. Programs review data at least quarterly to ensure completeness and accuracy and to determine their standing regarding projected outcome targets. The managed platform will generate annual reports on student performance measures for submission to OCTAE.

3. The AEP will conduct on-site reviews at least every five years guided by a review instrument. Onsite program reviews provide an additional effective tool for continuous improvement.

Assessing the quality of activities for professional development: Section 223(a)(1)(B) of WIOA (B) requires… "the establishment or operation of high quality professional development programs to improve the instruction provided pursuant to local activities required under section 231(b), including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners, instruction provided by volunteers or by personnel of a State or outlying area, and dissemination of information about models and promising practices related to such programs." Participants in professional development activities were surveyed after all workshops, conference presentations, and webinars to evaluate and provide feedback on the activity or event. The annual training plan includes state priorities, input from surveys on training needs and advice from professional development presenters. Survey results are reviewed by the professional development team at the AEP central office. In designing an annual professional development plan, the AEP uses an assessment tool to assess the professional development activities implemented to determine the extent to which adult service professionals have core competencies and skills relevant to their competence field. The assessment tool will include a list of items to examine competencies relevant to the core adult participants' activities. The assessment will identify areas of strength, areas for improvement, and the next steps for planning. The assessment tool will inform the AEP about the quality of staff capacity and will also serve as a baseline for evaluating the outcome of the professional development plan. The staff will rank how relevant they believe each competence is to their job responsibilities, how knowledgeable or skilled they believe they are in each competence, how much training they have in each competence, and other competencies.

Performance accountability: Performance accountability assesses the effectiveness of grantees in achieving continuous improvement in adult education and literacy activities. The performance outcome measures consist of the following core indicators:

1. Percentage of program participants in unsubsidized employment during the second quarter after program exit.
2. Percentage of program participants in unsubsidized employment during the fourth quarter after program exit.
3. The median earnings of program participants in unsubsidized employment during the second quarter after exiting the program.
4. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized post-secondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.
5. Indicators of effectiveness in serving employers were established pursuant to the WIOA.
6. Measurement of the effectiveness of service providers in the previous delivery of services.
7. Review and consideration of the local workforce Boards comments on the service providers' proposal in terms of alignment with the regional plan of each concerned local area.

Program accountability is measured using the following outcome measures:

1. Measurable skill gains (MSG) are reported during regularly established survey schedules as required by the National Reporting System. This is based on the lowest functioning level in which the participant earned at least one eligible literacy completion point, earned a diploma in secondary education, or exited and enrolled in a post-secondary career and technical education by the end of the reporting year.
2. Credential Attainment Rate measures student attainment of a secondary school diploma, recognized equivalent, or enrolled in post-secondary education or career training within one year of exit.

3. Employment Rate (second quarter after exit) measures the number of participants that exit during the reporting period who are employed during the second quarter after exit divided by the number of those that exited during the reporting period.
4. Median Earnings (second quarter after exit) for all doing exit in a core program, the report of the wage that is at the midpoint between the highest and lowest wages earned in the second quarter after exit.
5. Employment Rate (fourth quarter) for the number of participants doing exit during the reporting period who are employed during the fourth quarter after exit divided by the number of those exiting during the reporting period.

Each fiscal year, the Adult Education program negotiates the proposed target percentages for each of the core indicators of performance with the USDOE, Office of Career, Technical and Adult Education (OCTAE). Each local program is responsible for meeting or exceeding negotiated performance targets.

End of narrative.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

Section 427 of the General Education Provisions Act (GEPA)

1. SF424B- Assurances – Non-Construction Programs

2. Grants.gov- Certification Regarding Lobbying

3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable).

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES

States must provide written and signed certifications that:

1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may conduct each provision of the plan;
4.	All provisions of the plan are consistent with State law;
5.	A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
The State Plan must include assurances that:	
1.	The eligible agency will expend funds appropriated to conduct 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);
2.	The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;
3.	The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is

	providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;
4.	Using funds made available under title II of WIOA to conduct 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.
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).

Section 427 of the General Education Provisions Act (GEPA)

Instructions: In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally Assisted Program for students, teachers, and other program beneficiaries with special needs provide information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions.

OMB Control No. 1894-0005 (Exp. 04/30/2020)

Puerto Rico Adult Education Program (AEP) General Education Provisions Act (GEPA) Section 427 certification for the 2020-2023 WIOA-AEFLA unified plan.

All program activities for the Adult Education Program (AEP) at the Puerto Rico Department of Education will comply with Section 427 of the General Education Provisions Act (GEPA), which outlines the six types of barriers that can impede equitable access or participation in program activities, including gender, race, national origin, color, disability, and age. AEP program activities target adult students of different genders, races, national origins, colors, disabilities, and ages, to the fullest extent possible. No participant will be denied participation in program

activities based on gender, race, national origin, color, age, or disability. The AEP State Director will monitor program activities to ensure that equitable participation in program activities is not limited by gender, race, national origin, color, disability, or age. The AEP will implement the following specific measures:

1. The Department of Education of Puerto Rico has an active Reasonable Accommodation Policy that includes policies and procedures that provide the necessary accommodation for each person with disabilities in our school community. Additionally, the Adult Education Program complied with this requirement in eligibility consideration No. 2. This section outlines the requirements put in place by each educational provider to disclose their accommodation policy contemplating accommodation for the disabled population, including those with learning disabilities, as established in Section 231(e)(2) of the WIOA, which requires that each application of funds disclose how they will provide accommodations for physical, mental, and learning disabilities. These include students, teachers, and all other personnel in the educational provider-school community. This requirement is considered during the evaluation process of the application submission process as established and in compliance with Section 427 of the GEPA Law.

2. Use of Leadership funds to meet GEPA requirements: PRDE - AEP is using leadership funds to create a systematic process that uses technology to level the playing field by providing equity and access to all students while offering strategies using technology that impacts a broad range of students with diverse learning needs. Students will also have continual access to learning resources, expertise, authoritative sources, online tutoring and guided courses, information management, and communication tools. In addition, students will have access to digital learning resources with interactive technologies and relevant learning experiences from a blended delivery model that uses digital content and teacher instruction. All AEP service providers have been provided with interactive classrooms, the Internet, digital smart boards, and computers. In addition, blended learning methods are used to meet students' diverse learning needs. Students will be empowered to take ownership of their learning and develop self-directed goals to document their strengths, goals, progress toward college, career readiness, and career pathways. This effort on

career pathways will be of significant value in providing equity and access to all participants to a transition from unemployment, very low-income brackets to a quality job opportunity, or post-secondary education.

3. Create a systematic process that uses technology to level the playing field by providing equity and access to all students while offering strategies using technology that impacts a broad range of students with diverse learning needs. Students will also have continual access to learning resources, expertise, authoritative sources, online tutoring and guided courses, information management, and communication tools. In addition, students will have access to digital learning resources with interactive technologies and relevant learning experiences from a blended delivery model that uses digital content and teacher instruction. Blended learning methods will be utilized to meet the diverse learning needs of students. Students will be empowered to take ownership of their learning and develop self-directed goals to document their strengths, goals, progress toward college, career readiness, and career pathways.

4. The AEP recognizes that some low-income students and students in rural settings are unable to access ABE instructions because they do not have transportation. The AEP will provide students with ABE instruction via technology to eliminate distance and transportation barriers.

5. The AEP will build the capacity for transformation to a technology-driven culture in rural areas that advances access and enables teacher efficacy, achievement, and engagement for all students.

6. To provide highly qualified teachers with rigorous instruction, AEP will include a transition to allowing students access to the most effective teachers via technology. We will ensure that students have access to the most effective teachers, while enhancing the capacity of highly qualified teachers.

NOTICE TO ALL APPLICANTS

Review of linked documents. Where "applicant" is mentioned, that refers to the State eligible agency and "application" refers to the state plan. This element does not apply to local providers for state-planning purposes. State-eligible agencies are required to maintain local GEPA responses separately from the state plan. The State-eligible agency must respond to GEPA regarding the use of AEFLA State Administration and State Leadership funds in the State Plan.

The purpose of this enclosure is to inform you about the following provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of the GEPA affects applicants for new grant awards under this program. ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it conducts with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding must provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its federally assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows the applicants' discretion to develop the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, one should determine whether these or other barriers may prevent students,

teachers, etc. from such access or participation in a federally funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes but rather to ensure that, in designing their projects, applicants for federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and achieve ambitious standards. Consistent with program requirements and its approved application, an applicant may use the federal funds awarded to it to eliminate the barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant complies with Section 427.

(1) An applicant who proposes conducting an adult literacy project serving, among others, adults with limited English proficiency, might describe how it intends to distribute a brochure about the proposed project to potential participants in their native language.

(2) An applicant who proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or braille for students who are blind.

(3) An applicant that proposes to conduct a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant who proposes a project to increase school safety might describe the special efforts it will take to address the concerns of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students.

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act (PRA) of 1995, no person is required to respond to a collection of information unless it displays a valid OMB control number. The public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefits (Public Law 103-382. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537, or email ICDocketMgr@ed.gov and reference OMB Control Number 1894-0005.

SF424B - Assurances – Non-Construction Programs

(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

1. Grants.gov - Certification Regarding Lobbying

(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

2. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

APPLICANT'S ORGANIZATION	Enter information in this column
Applicant's Organization	Puerto Rico Department of Education

APPLICANT'S ORGANIZATION	Enter information in this column
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Yanira I.
Last Name	Raíces Vega
Title	Secretary
Email	Raices_Y@de.pr.gov

VOCATIONAL REHABILITATION

Program-Specific Requirements for State Vocational Rehabilitation (Combined)

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.

1. 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

(B) has established a State Rehabilitation Council

2. In accordance with Assurance (a)(1)(B), if selected, 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.
Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	Ongoing	07/2024
Parent Training and Information Center	Ongoing	05/2024
Client Assistance Program	Ongoing	01/2017
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	First Term	09/2024
Community Rehabilitation Program Service Provider	Vacant	
Business, Industry, and Labor	First Term	12/2025
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Disability Advocacy Groups	Vacant	
Current or Former Applicants for, or Recipients of, VR services	First Term	10/2023
Section 121 Project Directors in the State (as applicable)	N/A	
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	Ongoing	06/2021

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
State Workforce Development Board	Ongoing	07/2024
VR Agency Director (Ex Officio)	Ongoing	02/2025
Parent, Family Members or Advocates for People with Disabilities	Vacant	

3. 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.

The Qualified Vocational Rehabilitation (VR) Counselor vacancy was filled in September 2024. The SRC sent the announcement to the VR State Agency and the Graduated School of Rehabilitation Counseling and the Rehabilitation Counselors' College (Association).

The State Independent Living Council has representation on the Council. Its president began her duties as a member of the CERPR in July 2024.

There are currently vacancies on the Puerto Rico State Rehabilitation Council (CERPR). On December 2023 the SRC sent to the Governor's Office a recommendation of a candidate to fill the Business, Industry and Labor Sector vacancy. Waiting for approval. Still having other vacancies for this sector, but no candidates identified yet. The Office of Executive and Judicial Appointments at La Fortaleza, under the Governor's Office, received the recommendation of other three (3) candidates interested in joining the Council to fill the vacancies of the Community Rehabilitation Programs, Disability Advocacy Groups, and Parents, Family Members or Advocates of People with Disabilities. These candidates have already been interviewed by the CERPR and are awaiting their appointment by the Governor.

The PRVRA has recommended candidates and will continue providing the Council with the necessary support to fill the vacancies.

4. 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.

The Puerto Rico State Rehabilitation Council (CERPR by its Spanish acronym) has fulfilled its mission of advising and making recommendations, contributing to the development of the Puerto Rico's Vocational Rehabilitation Administration's (PRVRA) public policy. This has been achieved through collaboration in providing information for the PRVRA Portion of the Unified State Plan, as well as through the analysis, discussion, and submission of observations on the Normative Communications referred to the Council.

Also, the CERPR participated in the actions carried out during 2023 by the PRVRA to comply with the development of the Comprehensive Statewide Needs Assessment of Vocational Rehabilitation Services and had the opportunity to provide its feedback regarding the Goals, Priorities and Strategies developed based on the study. Therefore, it provides the following recommendations to the VRA.

Goal 1

Achieve greater effectiveness in the process of providing services to applicants/consumers for a successful integration into the labor force.

Recommendations or Input of the CERPR:

1. Agrees and sees the established goals, priorities, and strategies as favorable, however, it recommends the agency makes sure to have the appropriate professionals to carry out and achieve the proposed strategies.
2. Requests information related to the established protocol for an employer to request the salary incentive.

3. It recommends that the protocol of granting the salary incentive is accessible and viable for the employers that are interested in requesting it.

4. Volunteers to collaborate with the VRA offering guidance to employers related to the benefits of hiring people with disabilities and other possible topics of interest. It also recommends offering guidance to the employers about the tax credits or exemptions that may be available to provide reasonable accommodations to its employees. The ADA National Network can be approached to receive guidance and assistance about these matters.

5. Recommends examining the viability of providing training to the agency's personnel in current affairs and to the employers in matters of interest, through the Technical Assistance Centers or other resources.

6. Recommends approaching the Manufacturers Association and requesting allowing the VRA to have some type of participation in the association's activities, with the objective of encouraging the employment of people with disabilities.

7. Recommends approaching the Secretary of the Puerto Rico Department of Economic Development and Commerce to achieve an alliance to allow greater approximation with the employers and collaborative employment projects.

Goal 2

Contribute to increasing the skills and opportunities of students with disabilities through the provision of Pre-Employment Transition Services.

Recommendations or Input of the CERPR:

1. Agrees with the strategies designed for the provision of Pre-Employment Transition and Transition Services.

2. Recommends serving the greatest number of youths and students with disabilities and provide more attention to the least served students with disabilities outside of the metropolitan area, especially in the center of the island.

3. Recommends maintaining the participation of the VRA personnel in the meetings of the Programming and Placement committee (COMPU by its Spanish acronym) of the young persons in transition and, for that, to have more communication between the Department of Education and the Vocational Rehabilitation Administration to find strategies to allow greater participation of the VRA personnel in those meetings during the whole year.

Goal 3

Strengthen administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

Recommendations and input of the CERPR:

1. Recommends approaching the universities that offer careers in marketing, public communication, production, and digital video editing to explore a possible collaboration that allows the students to develop tools to accelerate the broadcasting of information and services; among them videos directed toward the students with disabilities, applicants/consumers, and employers. Among the possible educational institutions and other entities that could be contacted would be, for example: Sagrado Corazón University (Community Outreach area), Cinematography Science, Arts and Television College (CCAT by its Spanish acronym), Atlantic University College, Ana G. Méndez University, Channel 6, Arts and Technology Lyceum, among others.
2. Recommends the Vocational Rehabilitation Administration includes on its webpage an area where all Normative Communications can be available to the people with disabilities, family members and public that want to know the public policy of the Administration. It recommends using the webpage of the Department of Education as reference, which is accessible and has the procedures manual, circular letters, forms, etc. for the benefit of the population which they serve. The PRVRA does not currently have its Procedures Manual, Circular Letters, Forms, or other documents considered to be public in nature available on its website.

3. Requests the VRA to continue sharing with the with CERPR the Normative Communications in the draft stage, so that the Council can carry out its role, established by the Rehabilitation Act, to actively participate in the development of the public policy of the Agency. The recommendation is currently being implemented; however, the CERPR is unaware of whether the VRA has taken into consideration the recommendations submitted in the draft Normative Communications, as we have not received any information indicating whether our input was accepted.

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

List each recommendation/input followed by the VR agency response

The VRA reviews the recommendations made by the CERPR to the VRA Portion of the Unified State Plan and presents the following information:

Goal 1

1. The VRA is constantly evaluating the personnel and recruiting needs, as well as the opportunities to establish collaboration with other entities to carry out some of the plan strategies.

2. Normative Communication No.: 2025-11, establishes the updated procedure for the granting of salary incentives. It has already been shared with the CERPR for its awareness and reference.

3. The protocol established for granting incentives requires the employers to present the documents established by law to comply with the granting of contracts in the Government of Puerto Rico (ex. Certificate of Good Standing, among others).

4. We accept the recommendation. During the period from July 1, 2024, to June 30, 2025, the Central-East region, through the Support and Employment Modalities Centers (SEMC, or "CAME" by its Spanish acronym), reached 42 employers. During this same period, the

Northern region reached 65 employers. The Southern region succeeded in reaching 180 employers, and the Western region reached 121 employers.

5. We accept the recommendation. During AP 2024, the Agency fulfilled its commitment to provide training to both agency employees and employers, as reflected in the progress report.

6. On October 31, 2025, a meeting was held with the President and representatives of the Industrialists Association to discuss the draft Memorandum of Understanding (MOU) and review the proposed terms prior to its signing. They committed to reviewing the draft MOU and returning it with their comments and recommendations. It was returned on February 23, 2026.

7. We accept the recommendation and inform you that the VRA participates in the meetings of WIOA State Board, that take place at the Department of Economic Development and Commerce. Also, VRA participates in the 15 Local Boards of Labor Development, island wide.

Goal 2

1. We accept the reaction.

2. VRA provides services to youths and students with disabilities throughout the island following the same procedure in all regions.

3. We accept the recommendation and will approach the Department of Education to evaluate possible strategies.

Goal 3

1. We inform that, on February 26, 2025, the VRA presented an initiative to create a video providing information on the mission, vision, and purpose of vocational rehabilitation services. A second video in sign language was also presented, containing the agency's office contact information, and additional videos featuring basic sign language have been produced as part of ongoing accessibility efforts. Furthermore, on February 4, recordings

began for new sign language videos, with sessions continuing on February 20, to promote awareness, accessibility, and inclusion of the Deaf community within the agency.

2. The VRA webpage now includes a "Documents" tab, within which the "Public Policy" section is located. The Information Systems Office will be uploading the documents shortly to ensure that relevant information is accessible to applicants, consumers, and the general public.

3. We accept the recommendation and, as agreed previously with CERPR, the Agency is committed to ensuring that draft documents continue to be shared with the CERPR, as has been the established practice. Likewise, feedback is being provided by copying them on the communication once it has been reviewed, so that the Council is informed of which of its recommendations were incorporated into each draft.

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;

In this and the following sections, the results of the most recent Comprehensive Statewide Needs Assessment of Rehabilitation Services, carried out by the company Énfasis Puerto Rico, are presented. The contract for said study was signed in June 2023 and the final findings report was presented in November 2023. It should be noted that the VRA has worked on several of the findings presented below.

Before presenting the specific needs of individuals with the most significant disabilities, required under this section, we will present the Executive Summary explaining the methodology and general recommendations of the researchers.

EXECUTIVE SUMMARY

Introduction

- Goal: The Comprehensive Statewide Needs Assessment of the Vocational Rehabilitation Services in Puerto Rico 2023, from now on 'the Study', has as its goal: to provide the Vocational Rehabilitation Administration (VRA) and the State Rehabilitation Council of Puerto Rico with a document with valid and reliable quantitative and qualitative data on the needs of people with disabilities and the needs for rehabilitation services in Puerto Rico that allow them to develop their goals, priority areas and strategies; as well as review and strengthen vocational rehabilitation services as part of the Unified State Plan that will be submitted to the federal government in 2024. One of the objectives was to analyze the needs of specific groups with the purpose of identifying unmet or poorly met needs and emerging needs [individuals with most significant disabilities, students (14 to 21 years old, studying at the secondary or post-secondary level), young people (14 to 24 years old, studying or not), and individuals belonging to minorities]. Énfasis is an independent consulting firm created in 1999 by Dr. Myrna Rivas, a social psychologist, which develops studies, assessments, and technical assistance for public and private entities in the social, education, health, and economic development areas. Énfasis was responsible for the previous 2020-2021 Study.

- Methodology: The information was collected through various primary and secondary sources. This multi-methods approach allowed us to contrast and compare the data obtained and conduct the triangulation of the findings, which provided greater reliability and validity to the analysis. As part of the Study, 41 semi-structured individual interviews were conducted with VRA key individuals and 46 with external key individuals, including Workforce Innovation and Opportunity Act (WIOA) partners. The Consumer Survey was administered, which achieved the participation of 382 applicants/consumers from six VRA regions (with a margin of error of +/-5% for a 95% confidence level); another Survey was administered that achieved the participation of 172 professionals and employers; eight focus groups were held with applicants/consumers; innovative and successful practices

were identified; the socio-economic context of Puerto Rico was analyzed; and conclusions and strategic recommendations were prepared.

- Consumer profile: 53% of the applicants/consumers surveyed were men; this proportion was reversed in the focus groups. The average age was 25.9 years. 67% were between 16 and 24 years old. 41% were studying without working and 32% were working at the time of the consultation. 49% are outside the labor market, either because they study, are unemployed and are not looking for work, have conditions that prevent them from working, and so forth. Among those who work or worked, 51% indicated that they do so with a full-time employer; 35% part-time, and 14% do it in self-employment or their own business. 14% were supported employment consumers. Compared to the 2020-2021 Study, it was found that they carry out a greater diversity of jobs; the increase in jobs related to health, administrative, professional, and manufacturing services is striking. In the focus groups, a third of the individuals were working, another was studying, and another was unemployed and looking for work.

- Profile of professionals and employers: 68% were women; and 48% had been in their jobs for between 0 and 8 years, although key individuals had been in their jobs for much longer. 38% of those surveyed were from the VRA; 24% from other public agencies; 19% from employers, employment agencies, and so forth; 10% from community entities; and 10% from post-secondary institutions. Conditions that they serve or employ the most: Cognitive disorders; autism spectrum disorder; specific learning problems; psychosocial; attention deficit hyperactivity disorder; and depression. VRA employees perceive a significant increase in cases of autism compared to the previous Study. The families were identified as having limited economic resources (below the poverty line) and with little support.

Applicants/consumers consulted and their relationship with the VRA

- Initial processes: The majority of applicants/consumers indicated that they had learned about the VRA services through the public school where they studied. Several focus group participants who studied in public and private schools indicated that in private schools they were not told about the VRA. The majority indicated that the initial orientation they received at the VRA was “very good” (52%). Their main recommendations were: to have information and requirements accessible online; provide information in writing and with easy-to-understand writing and language; guide students and their families at various grade levels; and that the VRA staff be more receptive to repeat the orientation as many times as necessary.

- Eligibility process: 44% described the process for determining eligibility as “very good.” This was the only topic where the perception of consumers with supported employment was more negative than the rest (in all the others, their evaluations were more positive). Consumers in the Southern Region expressed more positive satisfaction. In the focus groups, opinions were more divided: about 60% described the process as clear, that it lasted a reasonable time, and that the documents required were also reasonable; and the others indicated the opposite, that it took too long, they required many documents and evaluations and that they had to visit the VRA offices many times. 52% of those surveyed indicated that the process was carried out within the time established by the agency (60 days). A higher proportion of individuals in the Metro East and Central East regions expressed that the process “took longer.” The main recommendations were: to expedite and comply with the stipulated time; inform and communicate to applicants what is happening with their case; follow up on cases, especially if they are under evaluation by other professionals or there was a change of counselor; request fewer evaluations, have professionals who can do them faster and at no cost to the applicant; have greater sensitivity and empathy; and effectively integrate technology and applications (apps) in the procedures and monitoring of the process. In the focus groups, they recommended that counselors communicate periodically with applicants, especially if the process has exceeded 60 days.

- Start of services: 42% indicated that the information they received about procedures and next steps (after being eligible) was “very good.” Half of the people in the focus groups indicated that everything was very good, and the other half felt confused and had many doubts about what services would be offered to them, when, how, and so forth; who would call them; how often, and so forth. 37% indicated that the waiting time to receive the VRA services was “very good.” This was one of the topics where lower satisfaction was observed (as in the previous Study). The majority recommended that once eligibility is reported, clearer written information should be provided on the procedures and next steps to initiate services and that it should be clearer on the VRA portal site. Several also indicated that they did not fully understand what services they would receive; they found out along the way.

- Relationship with counselors: 45% of respondents indicated that communication with their counselor was “very good.” 22% indicated that they saw or spoke to each other at least once a month; and 19% every two to three months. 8% indicated that they had never spoken to or seen their counselor, only their technician. Only 30% of surveyed rated the frequency as “very good.” In the focus groups, the majority rated the frequency as insufficient. This was one of the topics with the lowest satisfaction (as in the previous Study). The Metro East Region had the most negative opinions and the South, West, and North regions had the most positive opinions. These recommended the counselors to be more receptive to answering questions; establish from the beginning what means they will use for communication between the parties; and how often the appointments would be.

- The counseling service: 45% of those surveyed described the services they have received directly from their counselor as “very good.” 42% consider that their counselor did help them a lot in selecting an appropriate employment goal, and 33% expressed that they were “very satisfied” with the employment goal they selected with their counselor. In the

focus groups, about 60% described the services as very positive for their personal development, respectful when defining goals, and expressed gratitude, but the others described counselors as deficient and shared their displeasure and dissatisfaction. They allege that the process of defining the goal was overwhelming. 43% indicated that communication with their counseling services technician was “very good.” The main recommendations for counseling services were: to increase the frequency of contacts; listen, be more receptive, empathetic, and respectful of consumers' interests; review, increase, and expedite financial aid; give more follow-ups; and be more up-to-date with new careers, occupations, and youngsters’ interests.

- Relationship with other VRA employees: 50% of those consulted did not give an opinion about the Assessment and Adjustment Centers (AAC, or "CAA" by its Spanish acronym) and 65% did not give an opinion about the Support and Employment Modalities Centers (SEMC, or "CAME" by its Spanish acronym) because they had not received these services. Among those who did respond, 47% indicated that AAC's communication and services were “very good”; and 47% also indicated that SEMC's communication and services were “very good". Several unemployed consumers expressed in the focus groups their frustration for not receiving more support in their job search and recommended that SEMC counselors and promoters work more as a team and be more initiative-taking in supporting and monitoring consumers. On the other hand, 44% indicated that the treatment of VRA employees was “very good” (it was 38% in the previous Study), as well as the administrative staff treatment.

- Support for employment and self-employment/own business: Only 19% of consumers indicated that they achieved some type of employment experience or job through VRA support. The highest proportion of individuals who did achieve support was observed in the Metro East Region; this is striking because this Region obtained a lower level of satisfaction on other issues. When compared with the previous Study, a reduction is observed in the perception of support received (it went from 28% to 19%). Only 31%

expressed being “very satisfied” with the support, it was one of the topics with the lowest satisfaction. Much dissatisfaction was also expressed in focus groups; however, some participants were very grateful for the support received both for jobs and for businesses of their own. 59% of consumers indicated that they are interested in self-employment or businesses of their own and recommended that VRA focus much more on this alternative because even if someone is not interested at the moment, they could be interested later at another time in their life.

The needs of people with disabilities and underserved groups

Applicants/consumers’ needs: The main general needs were: reasonable accommodations in employment (61%); financial aid; coordination with employers and employment agencies to achieve a first opportunity or employment experience; vocational or technical training, courses, or workshops; mental health services (including pharmacological); transportation; and development of innovative projects. The main needs in the area of vocational rehabilitation were: reasonable accommodations (59%); financial aid; coordination with employers and employment agencies; vocational or technical training, courses, or workshops; transportation (including driving classes and vehicle adaptation); coordination of services; and development of innovative projects. The need for more support was highlighted in the focus groups to obtain and retain employment; financial aid (faster and larger amounts); study and assistive technology equipment and materials arriving on time; and having access to psychological services (the topic of mental health came up in all groups).

Regarding unavailable services: 47% of those consulted indicated that “all the services” they have required from VRA have been available (it was 39% in the previous Study). Still, those who indicated that “very few were available” also increased (it went from 8% to 16%). They perceive that services that have been missing the most are: financial aid, which does not arrive or arrives very late (40%); support in finding or retaining employment and employment accommodations; vocational counseling and evaluation; and “all have been absent.” Other services also mentioned were: psychological services; physical and other therapeutic therapy; occupational therapy,

adjustments, and refreshers; transportation and mobility (including driving classes and vehicle adaptation); assistive technology equipment (including wheelchairs and equipment for the visually and hearing impaired); and of independent living and activities of daily living. 37% described the services as “very agile.” The results were slightly more negative than in the previous Study: the “poorly” and “very poorly” totaled 14% and now 20%. Individuals who responded poorly or very poorly explained that they did so because of: the slowdown in the procedures to obtain a response or resolution for their case (45%); poor communication with the counselor; lack of access to financial aid, equipment, and materials; the lack of support for job search and placement; the lack of evaluations; little access to psychological services and therapies of all kinds; and the lack of support to obtain any professional license or certification when finishing school. In the focus groups, the individuals most satisfied and grateful with VRA had participated in supported employment services, Employment Clubs, and Work-Based Learning Experiences (pre-employment) or had received direct support for their jobs or own businesses.

Professionals and employers’ opinions

The main general needs of the population with disabilities identified by professionals and employers were: reasonable accommodations in employment (47%); coordination with employers and employment agencies; vocational or technical training, courses, or workshops; mental health services (including pharmacological); financial aid; transportation; and self-intercession. Numerous complaints were collected about APS Healthcare's mental health services in all regions and their unwillingness to coordinate. The main needs in the area of vocational rehabilitation were: vocational or technical training, courses, or workshops (38%); reasonable accommodations in employment; coordination with employers; development of innovative projects; independent living services; coordination of services; and supported employment services for the most significant. Internal key people highlighted the need for the VRA to have more and better-paid employees (counselors, vocational evaluators, transition analysts, occupational therapists, and sign language interpreters). People from other sectors highlighted: the need to insert the VRA into the business ecosystem to improve coordination with employers;

strengthen employment services; interagency coordination; and those referred to independent living services.

Employers, factors preventing employment, and market trends in the VRA

- Employers' perception: Consumers gave 4.3 (on a Likert scale from 1 to 10) to the willingness of employers to recruit people with disabilities in Puerto Rico, professionals, and employers 4.5, internal key people 6.5, and external key people 7.5. Consumer evaluations were more negative than in the previous Study. Although the labor market appears to be more open to recruiting, they still do not experience it. In the focus groups, half expressed a negative perspective, and the other half observed a greater willingness and talked about their positive experiences with employers. The majority of professionals and employers consulted indicated that employers, although they need to recruit, still do not know how to make reasonable accommodations in the workplace, since they think they are expensive or complicated (65%); they fear lawsuits; Today's jobs require the employee to master multiple skills; and they are unaware of the positive qualities and successful experiences with this population. The premise "previous negative experiences with this population" was only mentioned by 3%. The majority recommended training employers, employment agencies, and Human Resources Managers on VRA services, legislation, reasonable accommodations, and successful cases. Key people recommended: training on accommodations with practical examples and successful cases that show the good qualities of these employees (stability, loyalty, responsibility, and so forth); creating a network of employers who are available to hire; and that the VRA has a more initiative-taking approach to the business sector. To further engage employers with the employment of students and young people with disabilities, it was recommended to continue with the Work-Based Learning Experiences model of the pre-employment transition services (PRE-ETS), which is perceived as one of the primary areas of the VRA progress in recent years.

- For applicants/consumers, the factors that prevent people with disabilities from obtaining or retaining employment were: “society's attitude, cultural prejudices” (49%); the bureaucracy and complexity of VRA processes; lack of support and monitoring in the workplace; adequate reasonable accommodations are not made in the workplace; and the disconnection between goals, skills and the labor market; lack of relation between what is studied and the employment. In the focus groups, they highlighted the need to have more support from the VRA in the employment search; more monitoring once they are at work; and access to mental health services to stay stable. For their part, half of professionals and employers pointed out the “little willingness of employers to recruit people with disabilities, fear of reasonable accommodation, lawsuits, dismissal, and so forth.” Other factors were: the lack of a robust public transportation system; reasonable accommodations are not made; today's jobs require multiple skills to be mastered; lack of support and monitoring in the workplace; and lack of access to mental health and emotional support services (including pharmacological); and the family's attitude or circumstances toward employment. Again, many criticisms of APS Healthcare services became known.

- Market trends in the VRA: The professionals and employers surveyed gave 4.6 (on a scale of 10) to the topic of how adapted VRA services are to labor market trends, internal key people 6.4; and external people 6. The recommendations were: training employers, employment agencies, and Human Resources Managers on VRA services, legislation, reasonable accommodations, and successful cases (41%); training counselors; and integrating more STEM occupations, teleworking, and innovations in employment options. Key people from other sectors were more insistent that the VRA must continue to create more links with the business ecosystem; continually train all their staff on the labor market since topics are continuously changing; promote more remote employment and teleworking; and promote more self-employment and/or own business initiatives.

Employee training, interagency collaboration

Training: The main recommendations of those surveyed were: to have a continuous training system within the VRA for all employees; offer mentoring and support for several months to new employees to facilitate their immersion and increase their retention and loyalty; training to manage the growing population with autism spectrum disorder; training on how to integrate technological goals, remote work, and self-employment. Learn more about the latest trends in the current job market (new jobs, changes in application processes, new resumes, interview formats, and so forth) and new assistive technology equipment. Key people from other sectors further emphasized that the VRA must strengthen its staff's knowledge of reasonable accommodations and how to communicate them clearly and in simple language to employers; employment statistics, occupation projections, and the business ecosystem of Puerto Rico; types of assessments (ecological, adaptive, test work experiences, simulations in real scenarios and other alternative vocational assessments). Other recommended topics were: mental health and drugs; self-employment and owning businesses; new careers and occupations of interest to new generations; the generation of Centennials, their interests and how to work on social skills (soft skills); and the effective treatment, communication, and follow-up of younger consumers (customer service).

Interagency coordination: Although there have been specific advances in the past three years, coordination between entities that serve people with disabilities in Puerto Rico is still perceived as weak and disjointed and with few links with the labor and business markets. The recommendations for coordination between the VRA and the DEPR were: to strengthen interagency communication at the central and regional levels through the designation of liaison people in each region who serve as a bridge to alleviate the communication of situations, attend to special cases, communicate agreements and guidelines, guide, and so forth; and to review public policy and sign new agreements between both agencies that clarify issues such as evaluations and assistive technology equipment. Other recommendations were: that the VRA attend the COMPU and the DEPR inform more about the dates; and that the VRA periodically visits and guides school staff and families in the schools themselves. The recommendations for coordination between the VRA and post-secondary institutions were: to clarify and modernize

the VRA's public policy on the offer of training and programs that it can support; and that the VRA periodically guides key personnel of these institutions about their role and services, as well as the importance of the employment goal ("We are not a scholarship"); appoint liaison people; that the VRA be more open to communicate and address students' particular situations; that the VRA visit these institutions and learn more about the changing academic offerings; and establishing more agreements between the VRA and institutions that train professionals in the agency's difficult-to-recruit areas to offer incentives to students, internships and practical work exposure experiences. Recommendations to improve overall the VRA coordination efforts were: to designate liaisons at the central level and in each region to improve communication with other agencies; sign an interagency agreement for the management of cases of children and young people with disabilities in the custody of the Department of the Family (exempt from parent authorization); guide other agencies and employer/business associations about their role, employment accommodations with practical examples and successful cases; sign agreements with new private health service providers; ask APS Healthcare for more collaboration and better service for its consumers; co-organize collaborative training (cross training) with various entities; sign more agreements with other public and private agencies; and attend to more activities and special events organized by other entities. It was also recommended that the VRA ask for support from the technology staff of the Department of the Treasury to support the technological transformation and modernization.

General recommendations

1. Applicants/consumers: The main recommendations are summarized as follows: more support in the search and placement of employment and the necessary accommodations; financial aid and equipment; greater agility in all agency processes, especially in the eligibility process, evaluations, and aid payment; more communication and monitoring of counselors; and access to mental health services. The top priority services: more support for employment, self-employment, and accommodations; more financial aid for studies, food, transportation, equipment, materials, and so forth; improving counseling service, communication with counselors and follow-up; further agility in all services; faster assessments; and access to psychological services.

2. Professionals and employers: The main recommendations are summarized as follows: to review, temper, and update the VRA public policy to simplify, streamline, and optimize internal administrative processes; have more and better-paid staff and offer them ongoing training; and increase the VRA communication, agreements, and collaboration with the business/labor ecosystem and other public or private agencies. To attract individuals over 30 years old, they recommended: outreach campaigns that show people of all ages; and doing more outreach work in communities, municipalities, schools with the Adult Education Program, health service institutions (specialized hospitals, 330 Primary Health Centers), and so forth. The highest priority services were: counseling; search and placement services (regular or sustained-CRP-); vocational evaluation; occupational therapy, adjustments, and skills review; physical therapy and other rehabilitation services; and DEPR/VRA transition. The VRA employees emphasized the need for more and better-paid staff in all positions, especially vocational counselors and evaluators, occupational therapists, sign language interpreters, and transition analysts. Additionally, the need for more staff for AAC services, physical therapy, and other rehabilitation services was highlighted; to improve the facilities where these services are offered at the Medical Center. People from other sectors emphasized more the need to strengthen job search and placement; integrate technology into administrative issues; and offer all services more comprehensively- counseling, SEMC, and AAC- (“They have to achieve more organic services, so people don't feel like they are always fighting against the current to get services”). In addition, they recommended continuing to increase what has worked: CRPs, Employment Clubs, and pre-employment services.

3. Innovative and successful practices: The people consulted shared fewer examples than in the previous Study. Some of these were: Integrated Community Service Centers (One Stop); Youth Apprenticeship, On the Job Training, and new Work-Based Learning Experiences with specific profiles of young people that last all year; Summer Camps (public housing and non-public housing) to reinforce pre-employment and independent

living skills; outreach campaigns with the model of the Fundación Adecco (Spain); projects aimed at promoting business incubation with family support; Independent Living Housing Projects; Sheltered Workshop Programs; and the PEERS® Certificate: Program for the Education and Enrichment of Relational Skills that has proven to be effective with young people with autism spectrum disorder, attention deficit hyperactivity disorder, anxiety, depression and other socio-emotional problems.

Conclusions and Recommendations of the Research Team

Context analysis: The socio-demographic context of Puerto Rico has changed profoundly in the past ten years. The population has decreased by about 459 thousand people between 2010 and 2021,-12%, due to migration and a sustained decrease in the birth rate according to Census data. In 2021, 17% were under 18 years old, 61% were between 18-64 years old and 22% were over 65 years old. The population with disabilities has also decreased, although less than the rest of the population, going from 726,334 in 2010 to 712,517 in 2021, a slight reduction of 2%. This figure represents 21.8% of the population of Puerto Rico. Compared to data from the United States, the population in Puerto Rico is almost double that of the United States (13.0%). People with disabilities between 18-64 years old went from 378,514 in 2010 to an estimated 319,046 in 2021, which represents a reduction of 16%. However, the most important redaction occurred among those under 18 years old, from 67,585 in 2010 to 52,025 in 2019, a reduction of 23%; and to 42,913 in 2021, a reduction of 18% between 2019 and 2021.

Among people with disabilities, the poverty level is above that of people without disabilities, 47.0% compared to 38.7%, according to the ACS 2021. According to data from the Planning Board (2023), 47% of personal income comes from government transfers and other sources; in 2005 they were 29%. Government transfers favor the population that is not of working age, but also the working-age population that does not have a job or is actively looking for one. According to ACS 2021 data, 49.5% of households in Puerto Rico (577,665) received financial aid for food. One or more people with disabilities lived in 46.7% (269,619) of these homes. According to data from the U.S. Bureau of Labor Statistics, the unemployment rate in Puerto Rico has been decreasing in recent years, it went from 16% in 2011 to 8% in 2019 and 2020 and decreased to

6.0% in 2022. 25% of people with disabilities of working age (18-64 years) in PR are employed (79,881 people), compared to 58.3% of people without disabilities at that same age, according to data from the ACS 2021. In total, 7.7% of employed people in PR have some type of disability. The proportion of people with disabilities outside the workforce is very high, 69.9% of the total ACS 2019. In 2021, this proportion increased slightly to 70.1%. The groups with a higher proportion of active people (18-64 years) in the labor market (employed or unemployed) are people with vision and hearing difficulties, on the other hand, the groups with a higher proportion of people outside the labor market are those with independent living, self-care, and cognitive difficulties. Although the groups with the most people employed, in absolute terms, are those with vision, hearing, and cognitive difficulties, two of these are also the groups with the greatest number of people outside the labor market: individuals with mobility and cognitive difficulties, followed by independent living.

When comparing the validated fiscal year 2019-2020 data with the Department of Education's 2009-2010 enrollment data, we see a significant decrease of-41% in just 10 academic years. In the case of private schools, the reduction is even more marked with a-49% reduction in enrollment. For its part, the proportion of special education students compared to total enrollment is increasing in both public and private schools. The DEPR in 2020-2021 reported that they have an enrollment of 276,413 active students and 86,301 of these are special education; which represents 31% of the enrollment (DEPR, 2020). The student ratio in the fiscal year 2022-2023 is 81,309, accounting for 32% of enrollment. In 2022-2023, the most frequent categories of disabilities for students in the Special Education Program were: specific learning problems; other health impairments; speech and language problems; autism; and intellectual disability.

Conclusions of the Research Team: The review of the contextual data presents us with Puerto Rico facing important challenges such as the low birth rate, the migration of younger families with children, and a significant decrease in enrollment at the school and post-secondary level. But at the same time, there has been an increase in the proportion of students with special needs and a rise in conditions such as autism spectrum disorder. The context also presents us with a historically low unemployment rate and strong demand among multiple economic sectors that proactively seek labor. Although the economic and labor scenario is much more positive

than three years ago, the VRA has not been able to capitalize on it favorably, and therefore, generate benefits and consequent opportunities for people with disabilities whom it must guide towards an employment goal. The agency must be more initiative-taking, effective, and responsive in its relationship with four main players: (1) applicants/consumers and their families; (2) potential employers; (3) agency employees; and (4) other entities that serve this population.

Ten recommendations from the Research Team:

(1) Towards greater agility: It is urgent to review, temper, and update the VRA public policy to simplify steps, shorten times, and optimize administrative and programmatic processes, in order to offer faster and quality services to participants.

(2) Towards greater transparency: Completely refocus the application, eligibility determination, and direct service processes to align it with the viewpoint and needs of the applicant/consumer and their families.

(3) Towards greater effectiveness: Modernize and diligently process everything related to the request, management, and disbursement of direct financial aid to consumers; and payments or disbursements to post-secondary institutions and purchases from suppliers or other entities.

(4) Towards more models such as the CRP: Continue, expand, and allocate more economic resources to Community Rehabilitation Programs and bring more supported employment services to people with more significant disabilities in all regions.

(5) Towards a clear answer: Establish a Special Working Group (Task Force) that works for a defined time in the identification, resolution, or closure of cases that are in the process of determining eligibility and that are over 60 days or more; those that are in evaluation or reconsideration processes or that have been denied on several occasions.

(6) Towards a specialized service: Create a Specialized Unit to provide vocational rehabilitation service to students, young people, and adults with autism spectrum disorder.

(7) Towards a focused and motivated human resource: Have more and better-paid personnel, who receive continuous training. The professionals most in need are: vocational counselors,

vocational evaluators, occupational therapists, transition analysts, sign language interpreters, physical therapists, and other rehabilitation services.

(8) Towards more and better allies: Establish clearer agreements with the DEPR that clarify multiple issues such as evaluations and assistive technology equipment, and other entities to provide mental health services, among others.

(9) Towards leadership: The VRA must establish and lead a Work Committee to promote the successful employment of people with disabilities in Puerto Rico.

(10) Towards new populations: Bring guidance to schools and educational programs outside the DEPR, homeschooling associations, children's shelters, foster homes, and so forth.

1. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES

Most significant needs: No differences were observed between the needs identified by consumers of supported employment services and the others; although these emphasized more the need for mental health services (including pharmacological), general health, physical therapies, and other rehabilitation services. The main needs identified by them were: reasonable accommodations in employment; coordination with employers and employment agencies; vocational or technical training, courses, or workshops; coordination of interagency services; transportation; and development of innovative projects. 85% of these indicated that all or most of the services they needed were available (the average for all respondents was 47%). As indicated before, except for the eligibility process, this group expressed a more positive perception of the services received. The main needs for the group of professionals and employers surveyed were: coordination with employers; vocational or technical training, courses, or workshops; reasonable accommodations in employment; development of innovative projects; and independent living services. Most key people highlighted: the need to continue expanding supported employment services in all regions; promote more agreements with Community Rehabilitation Programs (CRP); and guide employers on accommodations with practical examples.

Recommendations to improve VRA services for people with most significant disabilities do not differ from those of the rest of the population. However, professionals and employers insisted on the need to have more CRPs for supported employment services in all regions; have more staff, especially counselors, vocational evaluators, occupational therapists, and sign language interpreters; streamline the eligibility process; and review, temper, and update the VRA public policy to make the agency more agile, effective, and technological.

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

According to the ACS 2021, 99.2% of people in Puerto Rico were hispanic or latinos (any race). PRVRA provides services to all eligible individuals with disabilities and no particular minority group was identified as part of this study. However, with the purpose to expand and serve a larger group of people with disabilities, the Agency maintains collaborative efforts with different agencies that can refer to the VRA, such as the Alliance of Autism, Significant Intellectual Disability (Department of Health), State Insurance Fund , Department of the Family, Department of Education, Deaf-Blind Project, Homeless Project. These collaborations allow us to reach into some of the groups identified as underserved.

Professionals and employers identified the following groups of individuals with disabilities as less served:

In general: Individuals with most significant disabilities (46%); private school students; Department of Education of Puerto Rico (DEPR) students who are and are not in the Special Education Program; individuals with autism spectrum disorder; young people who dropped out of school; minors in State custody; homeschooling students; individuals who reside in rural areas; individuals with transportation difficulties; and interested in self-employment or own business. Internal key people highlighted more individuals with most significant disabilities, with orthopedic situations, blind, deaf, deafblind, and over 30 years of age; in contrast, external people highlighted students from private schools, young people with autism, intellectual

disabilities, minors in State custody and individuals who were victims of accidents or violent incidents. Race, national origin, or membership in the LGBTQ community were not identified as exclusion factors in this Needs Study or the previous one.

With most significant disabilities: People with intellectual disabilities; with autism spectrum disorder; with transportation difficulty; blind or visually impaired; who reside in rural areas; those over 30 years old; and with mobility impairments, orthopedic or wheelchair users. The VRA employees expressed that they previously served more people with orthopedic conditions, in wheelchairs, blind, deaf, deafblind, over 30 years of age, and accident victims (referred by the State Insurance Fund Corporation and the Administration of Compensation for Automobile Accidents (ACAA by its Spanish acronym). Recommendations to improve VRA services for people with more significant impairments do not differ from those of the rest of the population. However, professionals and employers insisted on the need to have more CRPs for supported employment services in all regions; have more staff, especially counselors, vocational evaluators, occupational therapists, and sign language interpreters; streamline the eligibility process; and review, temper, and update the VRA public policy to make the agency more agile, effective, and technological.

Students and youth: Students with disabilities from private schools (41%); students and young people with autism spectrum disorder; DEPR students who are and are not in the Special Education Program; young people who dropped out of school; students and young people with more significant disabilities; homeschooling students; minors under State custody; young victims of crime or accidents; and with intellectual disabilities. Key people were very vocal in expressing their concern about the increase in students and young people with autism spectrum disorder and the few job alternatives that are being opened for this group in Puerto Rico, unlike other jurisdictions in the United States, Europe, and other countries.

C. Individuals with disabilities served through other components of the workforce development system; and

Job Connection Centers: Good collaboration was found between these Centers and VRA. The main recommendations were: to have personnel specialized in sign language; have specialized equipment for people with visual and hearing impairments; to review the agreements between the VRA and each Local Development Area to establish a more systematic and frequent calendar of counselor visits; train all its staff to provide good service to the population with disabilities; develop collaborative training or cross training with the VRA and other WIOA partners; reach agreements on what information can be exchanged; and have accessible facilities for people with mobility impairments and wheelchairs. Few people knew about the "Proyecto Talento Infinito" [Infinite Talent Project], but they were interested in learning more about this initiative and recommended that it be made known to the VRA employees so they can refer applicants and consumers to these services.

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.

Students and young people's needs: No differences were observed between the needs of students (14 to 21 years, studying at secondary or post-secondary level) and young people (14 to 24 years, studying or not), nor were differences observed between these groups and the rest of the population with disabilities. The main needs they identified were: reasonable accommodations in employment; vocational or technical training, courses, or workshops; financial aid; coordination with employers and employment agencies to achieve a first opportunity or labor experience; driving classes and vehicle adaptation; coordination of services; vocational rehabilitation counseling; vocational evaluation; communication skills; and placement and employment services. In the focus groups, the following stood out: financial aid for post-secondary studies; financial aid for other expenses (food, gasoline, lodging, materials, equipment); more support in the search and placement for employment (includes employment accommodations); and monitoring by their advisors. Services that they have required from the

VRA and have not been available and/or have had to wait a long time before receiving them were: financial aid; employment and the need for accommodations; vocational counseling and evaluation; all the services; access to mental health services (including pharmacological); occupational therapy, adjustments, and refreshers; transportation and mobility (includes driving classes and vehicle adaptation); and assistive technology equipment. Internal key people focused more on vocational counseling and assessment services; guidance to their families; and independent living and activities of daily living services. Key people from other sectors further emphasized the need to expand the offering of pre-vocational and technical workshops with innovative topics of interest to younger generations (baristas, graphic arts, pet care, drones, cosmetology, massage, tattoos, social networks, and so forth); interagency coordination; job search and placement services (includes accommodations); and access to quality mental health services. The employees of the Job Connection Centers identified as a problem the fact that young people arrive at them very disoriented regarding their vocational interests, without occupational skills, and with few communication skills. Furthermore, graduates of the DEPR Special Education Program do not have a Diploma with a degree, which makes it difficult to find a job.

As mentioned in section C, professionals and employers surveyed identified as the less served group of students and youth with disabilities, the followings: students with disabilities from private schools (41%); students and young people with autism spectrum disorder; DEPR students who are and are not in the Special Education Program; young people who dropped out of school; students and young people with more significant disabilities; homeschooling students; minors under State custody; young victims of crime or accidents; and with intellectual disabilities. Key people were very vocal in expressing their concern about the increase in students and young people with autism spectrum disorder and the few job alternatives that are being opened for this group in Puerto Rico, unlike other jurisdictions in the United States, Europe, and other countries.

IDEA Act Transition Services: The average score that consulted professionals and employers gave to the transition services provided by the DEPR was 5.5 (on a scale of 10) and the VRA was 6.5. Key people gave an average score of 6.5 to both agencies on this transition. About a third of those surveyed indicated that they have seen some positive developments in these services in

the past three years as a result of the agreements reached between both agencies for pre-employment services (under the WOIA Act). The main complaints focused on: the DEPR beginning the transition late; students arriving without basic skills for life or work; the VRA not having the necessary personnel to participate in the Special Education Programming and Placement Committees (COMPU, by its Spanish acronym), and to begin offering services (transition analysts, counselors, vocational evaluators, occupational therapists, and so forth); and that VRA does not process requests from students in transition quickly. The main recommendations were: offer occupational counseling, counseling for full career exploration and in earlier grades; recruit occupational or rehabilitation counselors; deliver assistive technology equipment to students on time and allow students to keep the equipment; and offer training for the development of social skills and independent living. As in the 2020-2021 Study, the issue of evaluations raised controversy and discomfort. On the one hand, the VRA staff understand that evaluations are often obsolete for the student's age, are not correct, and are of poor quality, therefore they have to be updated. The DEPR staff and people from other sectors understand that these reasons are valid and re-applying significantly affects the transition process, delays the prompt provision of services at the VRA, affects timely entry into post-secondary studies, and discourages applicants and their families. The topic of evaluations also came up in all focus groups; some participants expressed their complaints about the continuous evaluations they had to undergo for the VRA as part of the eligibility process, paying for them out of pocket. The main recommendations were: to have more transition counselors and analysts; participate in COMPUs; clarify public policy between agencies (DEPR and the VRA) on evaluations and equipment; request fewer evaluations and have professionals who can do these evaluations faster and at no cost to the applicant; streamline and simplify administrative procedures; incorporate electronic and virtual processes; and better communicate to families the requirements, next steps to follow, services, and times/calendar.

WIOA Act Transition Services: Although the number of applicants/consumers who used pre-employment services (Pre-ETS) was very low, they expressed high satisfaction with them. Several focus group participants spoke very positively about their Work-Based Learning Experiences (WBLE). The services best valued by professionals and employers consulted were WBA (9.2),

followed by Career Exploration Counseling, Self-Advocacy Instruction, Counseling for Transition to Postsecondary Education or Employment, and the Workplace Readiness Training Service to Develop Social and Independent Living Skills. They highlighted that the VRA has given significant importance to the development of these services in the past three years and also expressed a good opinion of the external entities contracted. The main recommendations were: to have more personnel to coordinate these services; expand and diversify WBLE employers; connect these services with counseling; develop orientations, workshops, and experiences focused on specific groups (for example, those with autism disorders); and prepare virtual material so that students and their families can request them and take some of the tests, interactive workshops, or orientations remotely (online).

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

CRP: Consumers expressed high satisfaction with the services of Community Rehabilitation Programs (CRPs) that offer supported employment services; 80% indicated that the services were "very good" or "good"; and also, that all services were available. The professionals and employers surveyed gave them an average score of 8.5 (on a scale of 10); internal key people 8.2 and external key people 8.5. As in the previous Study, they were identified as one of the most positive areas of vocational rehabilitation services in the past three years. However, 95% of those consulted indicated that there are not enough CRPs and supported employment services to meet the demand in Puerto Rico. The main service gaps were identified in the western, eastern, and central areas of the Island. Some training recommendations were: types of evaluations (ecological, adaptive, test work experiences, simulations in real scenarios, and other alternative vocational evaluations); labor market trends and innovative strategies for placement and employment; and the management of groups with specific conditions (autism spectrum disorder). The main recommendations were: to expand the contracts and quotas of people served by the CRP; that the VRA promote the creation of more CRPs; that CRPs diversify the types of jobs they offer; that the VRA be more flexible about the length with certain groups and listen more to the CRPs perspective; and to strengthen communication between the CRPs (Network).

ILC: Although the number of applicants/consumers who used the services of the Independent Living Centers (ILC) was very low, they expressed good satisfaction with them. For their part, the score given by professionals and employers was 6.5; key people also gave 6.5, similar to the previous Study. The main recommendations were: to establish more specific agreements between these Centers and the VRA for the referral of applicants and consumers; that the VRA train its staff on what ILCs are, when and how to refer them; to have more ILCs covering all regions; bring information from these ILCs to the DEPR so that no young person stays home after finishing school, especially those who are not eligible for VRA services; and that the State Independent Living Council, the Department of Health, and the VRA strengthen their communication about independent living services.

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

Based on the results of the Comprehensive Statewide Needs Assessment of Vocational Rehabilitation Services, monitoring and performance results, State's priorities and other sources of information, the VRA, in coordination and collaboration with the State Rehabilitation Council (CERPR), identify the goals and priorities necessary to carry out vocational rehabilitation and supported employment programs. The SRC participates in the development activities of the CSNA and provides its input. Draft goals, priorities and strategies are developed by VRA and discussed with the Council in a formal meeting. Second year revisions are carried out in the same way.

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.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

As mentioned in the previous section, the VRA developed its goals, priorities and strategies based on the results of the Comprehensive Statewide Needs Assessment of VR Needs, performance accountability measures, SRC recommendations, monitoring results and State's priorities, among others.

Goal 1

Achieve greater effectiveness in the process of providing services to applicants/consumers for a successful integration into the labor force.

Related to this goal and CSNA recommendation 1, the VRA is in the process of reviewing/amending several of the regulatory communications associated with the service

delivery process to applicants/consumers in accordance with the requirements of the Law and the recommendations made in federal monitoring. The Agency will train the VRCs in the implementation of guides and processes, with the purpose of offering successful service delivery. Likewise, results will be measured through reports generated annually on participants with employment outcome and consumer satisfaction surveys that will be carried out annually.

Priorities:

1. Emphasize the importance of applying public policy, counseling, and employment alternatives, in tune with the times and needs of the consumer.
2. Promote collaboration with other agencies and resources to ensure that applicants/consumers receive information and services necessary to enter the labor force.
3. Strengthen approaches and services to employers to promote the recruitment of people with disabilities.
4. Promote information exchange with applicants/consumers related to their vocational rehabilitation process.

Strategies:

- Increase the provision of general counseling service, career counseling and information exchange with applicants/consumers related to their vocational rehabilitation process.
- Implement and promote the use of the document sharing platform between counselor and consumer (PED)
- Promote the development of a platform for the applicant-consumer that allows the latter to learn about the status of his case (for instance: Awaiting documents from the applicant to determine eligibility; Referred to Vocational Evaluation; etc.).

- Offer formal training (with presentations), by the Central Level programmatic offices, directly to Vocational Rehabilitation Counselors, and technical assistance to the personnel of the Vocational Rehabilitation Counseling Services Centers in areas related to the new labor market trends (technological goals, remote work, online services); effective management of specific populations such as students and youth on the autism spectrum, with multiple conditions or mental health issues, among others; the ecological assessments, the new assistive technology equipment, self-employment initiatives, the registry and documentation of data for the RSA-911 report and performance indicators, among other topics.
- Promote the development of self-employment and remote job projects with other entities or agencies.
- Promote the development of job projects, work-based learning or job-related experiences for specific groups with significant or most significant disabilities.
- Refer VRA consumers and ineligible people with disabilities to Independent Living Centers.
- Strengthen coordination with the DLHR in order for the VRA personnel and consumers to participate, at least once a year in each region, in orientations and receive up-to-date information about the job market, high-demand jobs, and available opportunities.
- Develop an online referral exchange process with the Labor Connection Centers (formerly “Americans Job Centers”).
- Continue the implementation of the electronic sharing of referrals with other entities, namely, the Department of Education, and the State Insurance Fund Corporation.
- Develop printed material, also accessible through the VRA website, about community resources available to address consumer’s various needs.
- Coordinate the presentation of formal orientations to the VRA Rehabilitation Counselors on the services offered by programs under WIOA, at least once a year in each region.

- Expand outreach efforts to cover other demographic groups (e.g., municipalities, specialized hospitals, health providers, non-profit organizations that provide services to populations with significant disabilities, among others).
- Provide training and technical assistance to employers on: VRA services, recruitment of qualified people with disabilities, reasonable accommodation, among others. This includes approaches to individual employers and through public and private employer associations and agencies.
- Promote the granting of wage incentives to employers to increase employment opportunities for consumers.
- Continue providing physical and mental restoration services that are identified as necessary to achieve integration into the workforce.

Goal 2

Contribute to increasing the skills and opportunities of students with disabilities through the provision of Pre-Employment and Transition Services.

Priorities:

1. Serve as many youths and students with disabilities as possible.

In compliance with the total use of 15%, the VRA has developed the following measurement strategies to meet the implementation requirements and internal controls for the provision of pre-employment transition services:

- Quarterly meetings between the Pre-Employment Transition Services areas and the Finance Division to determine the amount of the minimum federal reserve and the amount spent.
- The Development of Internal Invoice Control and the Quarterly Report on Pre-Employment Transition Services.

- Training will be developed for Vocational Rehabilitation Counselors (VRC) and personnel who offer pre-employment transition services.
- Interagency coordination will be worked on with the University of Puerto Rico so that VRA consumers, who meet the criteria established for pre-employment transition services, participate in an Occupational Practice Work Experience.

Other Strategies:

- Maintain the participation of the VRA personnel at the meetings of the Committee on Programming and Placement (COMPU, by its acronym in Spanish) of youth in transition.
- Offer Pre-Employment Transition Services: Pre-Employment Transition Services Fairs, Boot Camps, Work-Based Learning Experiences and other activities will be carried out.

  Regarding the service delivery, training was coordinated for personnel who offer direct pre-employment transition services. The Pre-Employment Transition Area, under the VR Counseling Services Office, coordinates, develops and plans pre-employment transition services in accordance with WIOA requirements for students with all disabilities.
- Continue to identify new Transition referrals and the number of Transition referrals beginning to receive services during the program year.
- Continue orienting school staff, parents, and students about VRA services.
- Provide guidance on VRA services to home school and private schools students.
- Coordinate with the Department of Housing, Department of the Family, and community support groups to offer orientations in strategic places to identify out-of- school youths with disabilities who could benefit from VRA services.

Goal 3

Strengthen administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

This goal will be measured through the activities directed towards that goal. For example, at least one new video, module or material developed by each programmatic area and published during the State Plan period and trainings provided to employees at least once a year.

Related to this goal and CSNA recommendations 5 and 7, the VRC receive trainings and follow up through their supervisors and work plans regarding timely actions for eligibility determination. IPE development and other actions.

Regarding staff motivation, through the Job Classification Plan, steps were taken to increase Counselor's salaries.

Priorities:

1. Facilitate processes using technology, review of public policy and staff strengthening.

Strategies:

- Implement technology projects to facilitate case management and document sharing, among others.
- Integrate visual information resources (videos) to the website for people with disabilities interested in VRA services, and students with disabilities.
- Integrate videos and material geared to employers and make them accessible through the social media networks of the VRA (e. g. videos of success stories of consumers who have been employed and how the VRA can help employers to recruit qualified individuals with disabilities).
- Offer training to personnel to strengthen the knowledge and skills necessary to perform their duties.

- Offer orientations (through formal presentations), once a year, for all the personnel on the VRA Portion of the Unified State Plan, the Strategic Plan/Annual Execution Plan and its Goals and Strategies.
- Continue to conduct periodic performance evaluations of agency employees to ensure institutional effectiveness.
- Update administrative, fiscal, and programmatic procedures in line with established state and federal regulations, as necessary, and to promote institutional efficiency.
- Carry out programmatic monitoring of the service provision process and quality control monitoring to ensure compliance with public policy, quality of reported data and to identify areas for improvement.
- Provide technical assistance based on the findings of the monitoring processes and identification of needs by personnel at the central or regional level or during studies conducted.
- Establish goals (quotas) of consumers placed in regular employment by the personnel of the Support and Employment Modalities Centers (SEMC).
- Establish goals (quotas) for the coordination of job experiences carried out directly by the personnel of the SEMC.

A. Support innovation and expansion activities;

Strategy:

- Continue funding the SCR and CILs to assist and support their operations, as well as develop, in conjunction with the VRA, better employment and independent living opportunities for our applicants/consumers.

B. Overcome barriers to accessing VR and supported employment services;

The VRA has services available and accessible to all individuals with disabilities. There is no difference as to the availability of services for groups of specific disabilities, or specific cultural or racial groups. For the purpose of promoting the participation in vocational rehabilitation services and supported employment, the personnel of the agency participate in community orientation activities, which is evidenced by quarterly reports submitted to the Central Office including activities and number of people oriented.

Also, the VRA carries out actions as necessary to continue ensuring that its facilities are accessible to all individuals with disabilities. For example: Leasing contracts with facility owners and contracts with Pre-ETS providers include a clause establishing structural accessibility requirements according to ADA.

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

See Goal 2 and strategies above.

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Goal 1 and its strategies, specified above, apply to individuals under the VR and supported employment programs. However, additional goals and strategies for supported employment are included under description e.

The VRA continues to implement the following strategies to improve the performance with respect to evaluation standards and performance accountability measures:

- Continue the practice of regularly sharing statistical information with regional staff and providing technical assistance on WIOA Performance Indicators and data entry for the RSA-911 report (See Goal 1, fourth strategy, and Goal 3, eighth and ninth strategies, above).

- Continue promoting, among the Counseling Service Centers' staff, the use of the reports developed that allow them to see a list per work zone (caseload) with or without the information registered in the required fields, including:

1. MSG Active Cases: Shows the active cases of participants in each caseload and the registered dates for the elements 85, 343-347, and 401.

2. Cases st.26 and 28 Registration of Credentials: Shows closed cases upon receiving services, if they were registered as "Enrolled" in elements 78, 84 or 400, and whether they have Credential registration. This report allows the Counselor to identify cases that require follow-up for the Credential registration before concluding the period of one year after exiting. Furthermore, the projection is to develop a similar report for cases in st.20 and 22 (ready for employment and working).

3. Quarters for Post Exit Follow Ups: Displays a list of participants who exited the program after receiving services and the post exit employment data registered for second and fourth quarter follow-up. Staff have been provided with information on the importance of carrying out said follow-ups and data collection for performance indicators. In addition, the Office of Quality Control and Programmatic Management has referred to the Office of Information Systems the requirements for adjustments that the system needs in order to prevent data entry errors by the users and provide alerts for the registration of MSG and Credentials.

- Continue emphasizing the importance of services to employers, including the orientation and training to raise awareness of the benefits of recruiting and retaining individuals with disabilities, and technical assistance after placement (See Goal 1, strategies fourteenth and fifteenth, above).

- Continue sending or making available to the personnel of the Center for Vocational Rehabilitation Counseling Services the information of the Unemployment Insurance to complete the information about the employment indicators of the second and third quarters under WIOA.

- Continue promoting postsecondary education among its consumers and providing them with follow-up for the presentation of Credentials and proof of Measurable Skills Gained.

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;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

The following progress report corresponds to the Goals and Strategies established for PY 2024.

Goal 1

To achieve greater effectiveness in the service delivery to applicants/consumers for a successful integration into the workforce.

Strategy:

- Increase the provision of services such as general counseling, career counseling, and information sharing with applicants/consumers in connection with their vocational rehabilitation process.

Progress Report:

During PY 2024, the Vocational Rehabilitation Counseling Service Centers (VRCSC or “CSCRV” by its acronym in Spanish) certified as service provided 7,160 authorizations for counseling and guidance services under the Individualized Plan for Employment/Amendment and

393 authorizations for employment counseling services.

Strategy:

- Implement and promote the use of the document-exchange platform between counselor and consumer (PED – Digital Electronic Portal).

Progress Report:

The PRVRA implemented the PED on March 8, 2024. Through the PED, the following was achieved:

96,103 tasks sent/received
98,067 documents sent/received
4,088 applicants/consumers using the PED
321 Vocational Rehabilitation Counselors using the PED

Strategy:

- Promote the development of a platform that allows applicants/consumers to access information regarding the status of their case (for example: Pending applicant documents for eligibility determination; Referred for Vocational Evaluation; etc.).

Progress Report:

The Vocational Rehabilitation Administration (VRA) participated in the creation and implementation of the Unified Digital File for Persons with Functional Diversity, as required by Act No. 6 of April 11, 2025, as amended. Once the Unified Digital File is developed, the VRA will reassess the development of the applicant/consumer access platform to avoid duplication of information, given the integration of data and documents that will be shared through the Unified Digital File.

Strategy:

- The programmatic offices at the Central Level will provide formal trainings (with presentations) directly to Vocational Rehabilitation Counselors, as well as technical assistance to staff at the Vocational Rehabilitation Counseling Service Centers, in areas such as new labor-market trends (technological goals, remote work, online services); effective management of specific populations such as students and youth with autism spectrum disorder, individuals with multiple conditions or mental-health challenges; ecological evaluations; new assistive-technology equipment; self-employment and small-business initiatives; and the recording and documentation of RSA-911 report data, among other topics.

Progress Report:

During PY 2024, the Quality Control and Programmatic Management Office (QCPMO) monitored compliance with the Performance Indicators established by WIOA and the Local Evaluation Criteria. It sent statistical information and reports to all Vocational Rehabilitation Counseling Service Centers (VRCSC or CSCRV, by its acronym in Spanish) on the following dates:

Date	Topic
September 23, 2024	Achievements on Performance Indicators during PY 2023
December 22 and 27, 2024	Post Exit Follow Ups
February 20, 2025	Partial Performance Report
February 25, 2025	Number of days in status 02, 06, 10, 12, 20 and 22
February 25, 2025	Post Exit Follow Ups (updated report and instructions)

Date	Topic
March 18, 2025	Availability of the achievements report by caseload
March 25, 2025	Cases in st.22 (placed in employment)-updated
March 28 and June 6, 2025	Post Exit Follow Ups Report

The QCPMO also provided 794 individual technical assistances to the Counseling Services Centers' staff and 11 group technical assistances through electronic communication to the Vocational Rehabilitation Counselors (VRCs) on specific topics related to performance indicators, as detailed below:

Date	Topic
November 18, 2024	Adjustments to the post-exit follow-up screens
December 4, 2024	Required fields to record Credentials or Measurable Skill Gains (MSG)
December 12, 2024	Post-exit follow-ups and timeframes for entering or editing information
December 18, 2024	Editing post-exit quarters and Retention coding
January 8, 2025	Important reminders about recording Credentials
February 11, 2025	Data Element #85 (Used to calculate MSG)
February 21, 2025	Instructions about the Placement in Employment screen

Date	Topic
March 24 and 26, 2025	Reminder about recording Credentials before closing the case file
May 21, 2025	Information at IPE, Barriers, Enrollment, Credentials, MSG, Post-Exit and other fields
June 26, 2025	Recording of Credentials before closing the case file

The Finance and Budget Divisions offered ongoing technical assistance to counselors and support staff throughout the period and responded to inquiries from Central Level management staff as needed. This assistance was provided through telephone communication, electronic correspondence, and/or informal meetings.

At the CSCRV, regional directors and supervisors trained Vocational Rehabilitation Counselors (VRCs) and Support Staff through administrative meetings in which they discussed matters related to service delivery and the analysis of communications established to comply with public policy, among other topics.

The Office of Evaluation and Adjustment (OAA) offered, participated in, and coordinated the following:

It provided 33 technical assistances to approximately 35 VRCs and CSCRV staff on topics related to public policy, the services offered at the Evaluation and Adjustment Centers/Units (CAA/UAA), the consumer referral process, the scope of vocational evaluation services, and other relevant matters.

It offered one (1) training related to the Case Management Integrated Systems (CMIS) platform, in which it clarified questions regarding the referral process to the CAA/UAA, held on October 2, 2024.

The Office of Vocational Rehabilitation Counseling Services (OSCRV, by its Spanish acronym) provided 958 technical assistances to CSCRV staff related to the service delivery process.

Strategy:

- Promote the development of self-employment and remote-employment projects with other entities or agencies.

Progress Report:

The Office of Support and Employment Modalities (OSEM or “OAME”, by its Spanish acronym) established 12 contacts with various organizations and entities for the purpose of providing guidance and promoting the self-employment model and available supports.

The Support and Employment Modalities Centers (SEMC, or "CAME" by its Spanish acronym) achieved the following:
24 consumers in the economic self-employment modality achieved an employment outcome during the period.
13 agencies were contacted to promote self-employment projects.
0 agencies were contacted to promote remote-employment projects.
7 projects were implemented.

Strategy:

- Promote the development of employment projects, work-based learning experiences, or employment-related experiences for specific groups with significant or most significant disabilities.

Progress Report:

The CAME achieved:
Three (3) employment projects.
Zero (0) work-based learning experiences.

Two (2) employment-related experiences (general).

Nine (9) meetings to establish a pilot employment project for a particular group.

The CAME in the Southern Region is planning Agro-Employment Experiences for consumers with the most significant disabilities. To this end, it has conducted:

Seven (7) meetings, with a total participation of 27 individuals, detailed as follows:

Date	Participants
December 4, 2024	5
January 28, 2025	3
January 31, 2025	3
February 28, 2025	10
May 7, 2025	2
May 16, 2025	2
June 4, 2025	2
Total	27

The CAME of the East-Central Region achieved the following:

Two (2) meetings for the establishment of an Employment Pilot Project.

One (1) self-awareness workshop for consumers with Autism Spectrum Disorder, offered on April 15, 2025.

The CAME, CAA, and CSCRV of the East-Central Region developed the activity titled “Working Together: Inclusion and Autism” on April 3, 2025, with the participation of 18 consumers.

The OAA participated in one (1) virtual meeting aimed at developing a special project between the Southern CAME and the Western CAA, held on December 17, 2024, with the participation of three (3) professionals.

The OAME reviewed certain public policies and developed programmatic processes to guide and assist CAME personnel.

The OSCRV developed two (2) activities for participants with Autism Spectrum Disorder, as detailed below:

Date	Activity	Participants
April 2 and 3, 2025	Working Together: Inclusion and Autism	79
June 27, 2025	Working Together: Social Skills Development	16

Through interagency coordination, a group of employers was provided orientation regarding work-based learning experiences.

Strategy:

- Refer VRA consumers and ineligible individuals with disabilities to the Centers for Independent Living.

Progress Report:

The VRCSC made 18 referrals to the CIL, of which:

6 were eligible to receive services at the CIL

12 were not eligible for CIL services.

Strategy:

- Reinforce the coordination with the Department of Labor and Human Resources (DLHR) for the VRA personnel and consumers to receive conferences and up-to-date information of the labor market, high-demand jobs, and available opportunities, at least once a year in each region.

Progress Report:

The Support and Employment Modalities Centers:

Coordinated 18 activities with the DTRH to learn about employment trends and types of employers.
Provided 373 orientations to consumers.
Provided 81 orientations to VRCs and CAA staff on labor-market trends and high-demand occupations.

The Office of Support and Employment Modalities coordinated:

One (1) activity with the Auxiliary Secretariat for Training and Employment Promotion of the DTRH on October 29, 2024, with the participation of 16 professionals.
One (1) workshop on the ADA National Network and Ticket to Work on June 30, 2025.

The VR Counseling Service Office processed 213 forms submitted by the "Work Opportunity Tax Credit (WOTC)" Program of the DTRH's Employment and Reemployment Program, as part of employer certification requests for having hired consumers served by the Agency.

The VRA Administrator and the local DOL Secretary visited the Industry Program for Blind Persons and Individuals with Physical, Mental, and Developmental Disabilities on June 18, 2025, with the purpose of promoting the products manufactured, observing mop production, the performance of employees with disabilities, and the procedures used for the sale of the products produced.

Strategy:

- Develop an electronic referral-exchange process with the Labor Connection Centers (formerly American Job Centers).

Progress Report:

The OAME began reviewing public policies and developing the process in order to coordinate a meeting with the staff of the Workforce Development Program.

Strategy:

- Continue implementing electronic referral exchanges with other entities, such as the Department of Education and the State Insurance Fund Corporation.

Progress Report:

The Office of Information Systems (OSI) achieved:
Six (6) meetings with OSI and Department of Education (DE) staff.
Six (6) meetings with DE staff.
Six (6) visual representations of the data-exchange interface screens.

The Operational Policy Area, represented through Interagency Coordination, participated in one (1) in-person meeting with a VRA contractor and staff from the State Insurance Fund Corporation in July 2024. However, the agreement was not finalized.

Strategy:

- Develop printed materials, also accessible on the VRA's website, regarding community resources available to address various needs.

Progress Report:

The VRA prepared five (5) sign-language posters addressing communication needs related to atmospheric emergencies. The posters are available on the website and in printed form at Regional Offices and Central Level. It also redesigned six (6) brochures related to the service-delivery process, available both online and in printed form at Regional Offices and Central Level.

Strategy:

- Coordinate the presentation of formal orientations to Rehabilitation Counselors of the VRA on the services offered under WIOA programs, at least once a year in each region.

Progress Report:

The OVRCS and VRCSC:

- Did not coordinate presentations to the VRC on the services offered under WIOA programs.

Strategy:

- Expand outreach efforts to reach other demographics (e. g. municipalities, specialized hospitals, health providers, nonprofit organizations that provide services to populations with significant disabilities, among others).

Progress Report:

The VRA participated in and offered:

- Service Fair in the municipality of Cabo Rojo for the purpose of offering an orientation on VRA services: 251 students benefited therefrom.
- Workshop: Mental health in the workplace, to the personnel of the company Corteva Agriscience in Salinas on October 24, 2022: 29 professionals participated.
- 54 orientations at: educational, government, mental health, hospital, and municipal entities.

Strategy:

- Provide employers with training and technical assistance on: VRA services, recruiting of qualified individuals with disabilities, job accommodation, among others. This includes approaching individual employers and public and private associations and agencies grouping employers.

Progress Report:

The SEMCs (CAME) provided 27 orientations to other service providers. They also disseminated 12 promotional announcements, including:

1. A feature titled “Recognition in the Department”, highlighting the work of a consumer placed at LUMA Energy Puerto Rico through the supported-employment modality.
2. A call for a workshop for employers titled “Vocational Rehabilitation Services: Support and Employment for Persons with Disabilities,” offered on October 9, 2024.
3. A call for a workshop titled “Inclusive Leadership,” coordinated by the Southern Region CAME and the Ponce Region Employers’ Committee, with workshop topics including “Infinite Talent Ready to Work” and “Use of Orientation and Mobility Techniques for Blind Individuals,” offered on November 22, 2024.

On the Facebook social-media page, several features were posted, including:

Training of 11 individuals with disabilities through the Self-Employment course offered by the Southern Region CAME at the Ana G. Méndez University Ponce campus.

Training of more than 30 employees of Corteva Agriscience Salinas on “Building Bridges—Inclusion, Empathy, and Support Services for Persons with Functional Diversity,” offered on October 22, 2024.

Training of CSCRV and CAA staff in the Southern Region on “Preparing Consumers for the Realities of Today’s Labor Market,” offered on March 25, 2025.

Participation of consumers in the Labor Connection Center Job Fair held in Salinas on March 27, 2025.

Training of CSCRV, CAME, and CAA staff in the Southern Region through a workshop provided by the Statistics Unit of the DTRH on May 8–9, 2025.

The OAME provided 10 orientations to other potential service providers.

The VRA, represented by staff from the Administrator’s Office, coordinated one (1) meeting with the Director of the Graduate School of Rehabilitation Counseling and the Associate Professor at the University of Puerto Rico, Río Piedras Campus, on May 15, 2025, to follow up on collaborative

agreements and extend their validity to five (5) years.

Strategy:

- Provide training and technical assistance to employers on VRA services, recruitment of qualified individuals with disabilities, workplace accommodations, among other topics. This includes outreach to individual employers and to employer groups through public and private associations and agencies.

Progress Report:

The VRA:
Offered 47 orientations to educational entities, government agencies, mental-health providers, hospitals, municipalities, and others.
Disseminated information on opportunities for the provision of specialized services through social media and the Agency's website.
Disseminated information on available pre-employment transition services through Work-Based Learning Experiences, featured on the Agency's social media with over 300,000 views.
Achieved an increase in social-media followers, particularly on Facebook, with 38% growth.
The OAME distributed materials in person and electronically and provided orientation to employees and the general public during National Disability Employment Awareness Month through the campaign created by the U.S. Department of Labor in October 2024.
The OSCRV provided 25 orientations to participants of the Ticket to Work Program.

Strategy:

- Promote the granting of salary incentives to employers to increase job opportunities for consumers.

Progress Report:

The CAME provided eight (8) orientations and ten (10) technical assistances to employers regarding wage-incentive alternatives aimed at expanding and developing employment opportunities for VRA consumers with disabilities. However, although the corresponding orientation was provided, no wage-incentive contracts were formalized during Program Year 2024.

Strategy:

- Continue providing physical and mental restoration services identified as necessary to achieve integration into the workforce.

Progress Report:

The CSCRV certified 1,972 authorizations for physical and mental restoration services. Some services were provided through comparable benefits.

The Avaluation and Adjustment Centers served 2,209 cases through physical and mental restoration services, as detailed below:

Service Area	Served Individuals
Occupational Therapy	697
Physical Therapy	23
Physiatry	140
Speech-Language Pathology	357
Audiology	168
Psychology	824
Total	2,209

There is a possibility that some reported cases may have received professional services in more than one service area. This data was collected through manual records kept by the CAA/UAA

professionals, since the CAA-ARVI digital platform was inoperative and the CRIS Platform (managed by the CRV) was also undergoing work; resulting in a significant impact on the flow of referrals directed to the CAA/UAA.

Goal 2

Contribute to the increase in skills and opportunities for students with disabilities through the provision of Pre-Employment Transition and Transition Services.

Strategy:

- Maintain the participation of the VRA personnel at the meetings of the COMPU of youth in transition.

Progress Report:

The Rehabilitation Counseling Analysts achieved a total of 3,197 participations at COMPU at meetings of the Committee on Programming and Placement (COMPU, by its acronym in Spanish).

Strategy:

- Provide Pre-Employment Transition Services: Pre-ETS Service Fairs, Boot Camps, Work-Based Learning Experiences, and other activities.

Progress Report:

The VRA served 11,913 students with disabilities through pre-employment transition services.

The OSCRV, through the Pre-Employment Transition Unit, developed: 61 Pre-ETS service fairs; 14 Pre-ETS Boot Camps; 27 contracts for Pre-ETS services; 16 collaborative agreements for Pre-ETS services.

The Regional Pre-Employment Transition Service Areas provided approximately 16,700 orientations on the transition process, as follows: Parents: 700; Teachers: 5,000; Students: 11,000

Strategy:

- Continue identifying new Transition referrals, and those Transition referrals that begin to receive services during the program year.

Progress Report:

The VRA achieved:

- 2,972 referrals from schools that completed applications for service.
- 2,282 Individualized Plan for Employment were developed for youths between the ages of 14-24 years.
- 901 consumers referred from schools and transition had an employment outcome.

Strategy:

- Continue offering orientations to the school personnel, parents, and students about the VRA services.

Progress Report:

9,167 orientations were offered about the transition process and PRVRA services, to the following:

- Parents: 3,396
- Teachers:1,201
- Students: 4,570

Strategy:

- Provide orientations about VRA services to homeschoolers and students of private schools.

Progress Report

The VRCSO offered 8 orientations to home schooling students and 66 orientations at private schools.

Strategy:

- Coordinate with the Department of Housing, the Department of the Family, and community support groups to offer orientations in strategic places to identify out of school youths with disabilities who could benefit from VRA services.

Progress Report:

The Vocational Rehabilitation Counseling Service Centers of the North-Central Region provided 17 orientations in non-school settings, successfully identifying seven (7) youth with disabilities.

Goal 3

Strengthen the administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

Strategy:

- Implement technology projects to facilitate case management and document sharing, among others.

Progress Report:

The Information Systems Office (ISO) continued working on the post-implementation of the Vocational Rehabilitation Information System (VRIS) and one of its integrated modules, the Case Management Information System (CMIS). Also, initiated two (2) new projects related to technological innovations and improvements.

- Fiscal Module for the Finance Division
- Platform for the Evaluation and Adjustment Centers and Units

Strategy:

- To integrate information resources (videos) to the website for individuals with disabilities interested in VRA services.

Progress Report:

The PRVRA:

Presented one (1) initiative to develop a video providing information on the Agency's Mission and Vision and the purpose of vocational rehabilitation services on February 26, 2025.

Presented a second video in sign language providing contact information for the Agency's offices on March 25, 2025.

Developed a tutorial on the Procedure for Enrolling in Direct Deposit, available as a video on the Agency's website, directed to applicants/consumers receiving maintenance, transportation, or lodging services, as applicable.

The OSI integrated four (4) informational resources into the Agency's website, achieving three (3) measurable reach indicators in views and reproductions.

Strategy:

To develop videos and materials directed to employers and make them accessible through VRA social media (e.g., videos with success stories of employed consumers and information on how VRA can assist employers in hiring qualified individuals with disabilities).

Progress Report:

The OSI did not receive requests from the CAME to publish employer-directed videos or materials on the Agency's website.

The Southern Region CAME developed:

One (1) video in collaboration with the Department of Labor and Human Resources for an employer activity held on November 22, 2024.

Five (5) employer-directed materials:

1. One PowerPoint — Employer workshop at the Labor Connection Center: Vocational Rehabilitation Services: Support and Employment for Persons with Disabilities, offered October 9, 2025.
2. One PowerPoint — Workshop: Building Bridges: Inclusion, Empathy, and Support Services for Persons with Functional Diversity, offered October 22, 2025.
3. Promotional sheet for the workshop Inclusive Leadership (November 2024).
4. One PowerPoint — Interactive employer workshop: Inclusive Leadership: How I Can Support My Blind Employee, offered November 22, 2024.
5. One PowerPoint — Employer workshop: Infinite Talent Ready to Work, offered November 22, 2024.

The Western Region CAME developed two (2) quarterly informational bulletins (July–September 2024 and October–December 2024).

The VRA presented an educational campaign of visual posters in sign language for emergency situations and basic daily-life signs as a prelude to hurricane season, presented on April 3, 2025.

Strategy:

- To offer training to the personnel to strengthen their knowledge and skills as necessary for the performance of their duties.

Progress Report:

The Office of Labor Affairs and Human Resources coordinated 144 training activities for the VRA personnel, achieving 1,444 participations (includes professionals who participated in various trainings during the period).

Some of the topics of higher interest were:

- Hands Up Conference
- Suicide Prevention in Men: A Matter of Humanity

- Government Contracting
- Rehabilitation Counseling as an Agent of Social Change
- Self-Care Strategies to Prevent and Address Emotional Fatigue
- Microsoft TEAMS, One Drive y VPN
- Suicide Prevention in Children and Youths
- Managing Crisis Situations in Telephone Calls
- Integrating Self-Care in the Workplace
- Personnel Transactions
- Effective Supervision
- Good Public Governance
- Artificial Intelligence
- Effective Pre-Intervention
- The Deaf Community and Counseling: A Holistic Approach to Rehabilitation
- Silenced Voices: Deaf Women as Victims of Gender-Based Violence
- The Hope Model: Linking Pathways in Rehabilitation Counseling
- Cybersecurity and Microsoft MFA
- Active Shooter and Personal Defense
- Supervising with Emotional Intelligence
- Progressive Discipline in Supervision
- Cybertherapy Practice in Puerto Rico: Ethical Considerations, Security, and Evidence-Based Techniques

- Law 194 of 2000: Patient Bill of Rights and Responsibilities
- 2nd Convention of the Educational Interpreter Program – Uprooting the Ethics of Self-Promotion: Impacting the Personal Environment in Interpretation
- Understanding the Autism Spectrum Disorder
- Deaf Community: Health with Access and Dignity

The Administrator's Office coordinated the following activities, as detailed below:

- One (1) training titled Understanding Autism Spectrum Disorder: Characteristics, Associated Behaviors, and Practical Strategies for Effective Management, offered on May 30, 2025, with the participation of 107 professionals.
- Five (5) programmatic meetings in which the OSCRV, OAME, and OAA presented the services offered in each of their respective offices and centers, among other relevant matters. These meetings were held from May 12 to 15 and from May 19 to 20, 2025.

The OSI coordinated and delivered 17 trainings and activities, reaching 194 participations. These are detailed below:

Date	Training/Activity Topic	Participants
June 1st and Sept. 18, 2024	Voc. Rehab. Information System (VRIS) Training	30
July 9, 2024	Case Management Information System (CMIS) Training	7
August 15 and Sept. 13, 2024	Avaluation and Adjustment Center (CAA) Module Presentation	14
August 19 and Oct.3, 2024	CMIS Presentation	23

Date	Training/Activity Topic	Participants
Sept. 10, 2024	CMIS, CAA and Digital File Portal (PED, in Spanish) Presentation	9
Sept. 22, 23, 2024	CMIS-Fiscal System Training	20
Oct. 1,2, 2024	CMIS Presentation at Metro East Region	27
Oct. 1,2, 2024	CMIS Presentation at North Central Region	43
May 29, 2025	Discussion about CAME Module	8
June 12, 17, 2025	Discussion about CAA Module for Professionals	13

Note: It is important to highlight that the statistics provided include employees who participated in multiple trainings and activities during the period. Likewise, some topics were offered on two or more dates, with groups divided between morning and afternoon sessions.

The Office of Support and Employment Modalities (OAME, in Spanish) offered one (1) training on the services of the Department of Labor and Human Resources on November 29, 2024, with 16 professionals participating.

The OAA and the CAA/UAA coordinated or participated in several trainings and activities, as detailed below:

Date	Training or Activity	Participants
July 3, 2024	Annual Execution Plan 2024-2025 Discussion	3
July 3, 2024	Dressing Code for VR Personnel	1

Date	Training or Activity	Participants
August 19, 2024	CMIS Platform Presentation	14
September 18, 2024	CMIS, AAC and Digital File Portal (PED, in Spanish) Platforms Presentation	23
October 1, 2024	Effective Strategies to Reduce Access to Lethal Means in Suicide Prevention	1
October 18, 2024	Male Suicide Prevention	3
October 18, 2024	CAA New Platform	24
November 20, 2024	Suicide Prevention Protocol	1
December 11, 2024	Important Cases in Government Contracting	1
December 18, 2024	Establishing the 2025 Work Plan	3
December 19, 2024	The Importance of the Interpreter's Professional Practice	1
December 20, 2024	Social Factors Contributing to the Academic Underachievement of Puerto Rican Children	1
January 17, 2025	Introduction to Community-Based Occupational Therapy in Emerging Areas	5

Date	Training or Activity	Participants
January 24, 2025	Perspective of the Puerto Rican Deaf Community and Interactive Sign Language Workshop for Health Professionals	1
January 24, 2025	Self-Care, Health, and Wellness Strategies for Occupational Therapy Professionals (Research)	4
April 4, 2025	Annual Execution Plan 2025–2026	5
April 4, 11, 18 and 25, 2025	Intermediate Workshop on the JAWS Program	8
March 4, 2025	Orientation on “American Printing House for the Blind” (APH)	4
March 10, 24 and April7 and 28, 2025	Intervention Strategies and Best Practices for the Education of Children and Youth with Deafblindness	6
March 12, 2025	Vision Screeners Optec 5000	15
March 17, 2025	The Deaf Community and Counseling: A Holistic Approach to Rehabilitation	4

Date	Training or Activity	Participants
March 26, 2025	Supporting Deaf Students: Strategies for Campus Access	1
April 1, 2025	Supervising with Artificial Intelligence	1
April 7, 2025	Teaching Strategies for Access to the Curriculum / Orientation and Mobility	25
April 11, 2025	Data Migration to the VRIS Platform	1
April 11, 2025 and June 6,13, 20, 2025	Sign Language Project	4
May 23, 2025	Assistive Technology for Social Inclusion	44
May 30, 2025	Understanding Autism Spectrum Disorder	107
June 6, 2025	PATSI Assistive Technology Project	10
June 12, 2025	How to Use Artificial Intelligence Correctly	1

he OAA, the OSCRV, and the OAME participated in five (5) programmatic meetings convened at the request of the Office of the Administrator. During these meetings, the services offered by each of the offices and centers under their purview were presented, among other relevant matters. The meetings were held from May 12 to 15 and from May 19 to 20, 2025.

The OSCRV provided training to 267 employees from the pre-employment transition area regarding the contracts formalized for the provision of these services. The orientation was delivered in person.

Strategy:

• Provide an annual orientation (through a formal presentation) to all personnel on the VRA portion of the Unified State Plan, the Strategic Plan/Annual Execution Plan, and its Goals and Strategies.

Progress Report:

The OQCPM delivered four (4) formal trainings, with a total participation of 152 professionals, as detailed below:

Date	Training Topic	Participants
July 2, 2024	Presentation on the 2024–2025 Annual Execution Plan for Central Office Staff	13
July 8, 2024	Presentation on the 2024–2025 Annual Execution Plan for North and North Central Regions	42
July 9, 2024	Presentation on the 2024–2025 Annual Execution Plan for South and West Regions	55
July 11, 2024	Presentation on the 2024–2025 Annual Execution Plan for Metro East and Central East Regions	42

Strategy

- Continue conducting periodic employee performance evaluations to ensure institutional efficacy.

Progress Report:

The Office of Labor Relations and Human Resources (OLRHR) received 819 performance evaluations during the period.

Note: The performance evaluations are performed after each semester concludes. Based on this criterion, 344 evaluations correspond to the period from January to June 2024; 396 to the period from July to December 2024; and 79 to the period from January to June 2025.

The Training and Development Division responds to inquiries and provides guidance to supervisory staff regarding the evaluation procedure for their supervisees, as well as the training activities available and requested.

Strategy:

- Update administrative, fiscal, and programmatic procedures in accordance with the established state and federal regulations, as needed, and to promote institutional efficiency.

Progress Report:

Office of the Administrator:
- Developed Informative Communication No. 2025-01, Validation of Contact Hours for Rehabilitation Counselors, on August 5, 2024.
- Developed Informative Communication No. 2025-08, First Congress on Rehabilitation Counseling, on February 19, 2025.
- Developed Informative Communication No. 2025-09, 2025 Annual Convention/Assembly of the College of Rehabilitation Counseling Professionals of Puerto Rico, on February 24, 2025.
- Developed Informative Communication No. 2025-10, Proclamation Ceremony for Rehabilitation Counselor Week, on February 24, 2025.
- Developed Informative Communication No. 2025-11, Vocational Rehabilitation Counseling

Professionals Week 2025.

- Reviewed and updated the 2024–2025 Annual Execution Plan (AEP). To this end, it:

- Evaluated the communication dated February 19, 2025.

- Coordinated a meeting with the Directors of the programmatic offices and the Project Manager to review and update the AEP 2024–2025. The meeting was held on April 4, 2025, with the participation of five professionals.

- Participated in public hearings on the following legislative bills:

- House Bill 387: Single Digital Record for Persons with Functional Diversity Act, March 27, 2025.

- Senate Bill 413: Single Digital Record for Persons with Functional Diversity Act, March 28, 2025.

- Senate Bill 461: Independent Living Program Act, April 14, 2025.

- Senate Bill 635: Pilot Program for Centralization of Services for Persons with Disabilities Act, May 29, 2025.

- Submitted three explanatory memoranda for Senate Bills:

- Bill 387: Single Digital Record for Persons with Functional Diversity.

- Bill 439: Public Schools of Inclusion.

- Bill 413: Single Digital Record for Persons with Functional Diversity.

- Reviewed Memorandum No. 2025-001 from the Office of the Secretary of the Governorship, titled “Internal Measures to Promote Transparency and Integrity in Governmental Processes of Executive Branch Entities in Accordance with the Code of Ethics for Contractors”, on March 28, 2025.

Avaluation and Adjustment Office:

- Reviewed Normative Communication No. 2015-09, Amendment to the Service Delivery Procedure in Evaluation and Adjustment Centers/Units.

- Reviewed the Service Delivery Procedure Manual for Evaluation and Adjustment Centers/Units.

- Participated in a meeting with agency executives regarding the permissibility parameters of the Rehabilitation Act, on September 30, 2024.

- Participated in a meeting with program area directors to review Normative Communication No.

2025-11, Procedure for Granting Wage Incentives to Employers Who Hire Vocational Rehabilitation Consumers, on May 5, 2025.

- Managed the process to obtain the Regulated Biomedical Waste Management Permit, holding two meetings (November 21, 2024, and January 29, 2025).
- Established a Corrective Action Plan in response to the audit conducted by the Puerto Rico Office of the Comptroller, submitted January 30, 2025.
- Reviewed the Visual Rehabilitation Guide of the VR Administration on February 5, 2025.
- Responded to an information request from the Office of the Inspector General of Puerto Rico on February 18, 2025.
- Reviewed Form ARV-26 Part II on June 5, 2025.

VR Counseling Services Office:

- Reviewed multiple Normative Communications (2004–2023) related to referrals, advisory committees, personal assistance services, record transfers, interpreter and assistant service documentation, adapted driving evaluations, equipment repossession procedures, and training recommendations.
- Developed draft communications on:
    - ACAA referrals to VR.
    - Home modification services.
    - Use of the VR Mobile Unit.
    - Pre-employment transition services.
    - Recording and coding staff time dedicated to pre-employment transition services.
    - Handling service records of children or relatives of VR employees.
    - Direct deposit procedures for consumers receiving maintenance/transportation services.
- Developed Normative Communication No. 2025-03, Procedure for Applying Eligibility Criteria, on July 23, 2024.
- Reviewed and updated the Supervision Manual for the Rehabilitation Counseling Service Center (October 2024).
- Participated in the analysis of:

- Senate Bill 423: Amendments to the Organic Act of the Department of Health.
- House Bill 387: Single Digital Record for Persons with Functional Diversity.

Quality Control and Programmatic Management Office:

- Developed the Procedures Manual on Productivity Indicators under WIOA, to be published.
- Developed a draft communication to follow up on performance indicator data entry and service reporting, to be published.
- Provided ongoing updated technical assistance and instructions to the VR staff regarding performance indicators and technical assistance to the higher management staff regarding federal regulations related to the VR program and services, in order to support public policy development and updates.
- Through project management, carried out:
    - Annual Execution Plan (AEP) 2024–2025.
    - 2024 Results Report for the 2023–2024 AEP / 2023–2026 Strategic Plan.
    - Update of the Data Collection Form for CAME and central-level offices/divisions.
    - Semiannual review and tabulation of achievement reports.
    - Focus groups with Vocational Rehabilitation Counselors.
    - Adjustments to the Case Management Information System (CMIS).

Support and Employment Modalities Office:

- Reviewed Normative Communication No. 2019-08, Procedure for Recommending Commercial Enterprise under the Randolph-Sheppard Act.
- Reviewed Normative Communication No. 2023-08 (wage incentive procedure), which was repealed.
- Reviewed Normative Communication No. 2023-12, Update to the Stipend as Monetary Support for Consumers Participating in Job Clubs.
- Developed Informative Communication No. 2025-05, Supported Employment Service Contracts with Community Rehabilitation Programs for 2024–2025, on October 3, 2024.
- Developed Normative Communication No. 2025-01, Update to the Stipend as Monetary Support for Job Club Participants.

- Developed Normative Communication No. 2025-11, Procedure for Granting Wage Incentives to Employers Who Hire VR Consumers, on June 25, 2025.

Finance Division:

- Developed Administrative Communication No. 2025-03, Amendment to Administrative Communication 2016-01: Reduction of Administrative Expenses, on March 5, 2025.
- Developed Normative Communication No. 2025-09, Authorization, Control, and Registration of Authorized Signatures for Invoice Certification and Nullification, on March 7, 2025.

Documents Division:

- Developed Informative Communication No. 2025-13, Preventive Measures for the Protection of Public Documents During Hurricane Season, on May 27, 2025.

Strategy:

- Carry out program monitoring of the service delivery process and monitoring of quality control to ensure compliance with the public policy, the quality of data reported and identify areas for improvement.

Progress Report:

The CSCRV conducted 5,787 internal monitoring reviews of 6,935 applicant/consumer service case files to evaluate the management of the vocational rehabilitation process carried out by the counseling personnel under their supervision.

The QCPMO carried out the following quality-control monitoring activities:

1. Conducted the annual quality-control review of RSA-911 data for 18 physical case files from the Metro East, Central East, and North Central regions (Report completed on May 2, 2025).*
2. Reviewed approximately 564 electronic case files as part of the quarterly data-cleaning process.

3. Reviewed approximately 167 cases or electronic records in response to requests for corrections to Social Security numbers or identification numbers.

**Note: Staffing shortages within the QCPMO limited the number of monitoring reviews or examinations of physical and electronic case files.*

The CAA of the Metro East Region conducted:

Thirteen (13) monitoring reviews of referral movement and cases served, resulting in:
• 358 referrals or cases that received follow-up
• 15 CAA professionals impacted

One (1) monitoring review to verify and correlate electronic data with physical case files.

The OSCRV conducted 29 internal monitoring reviews of 715 applicant/consumer service case files to evaluate the service-delivery process and the corrective actions implemented to ensure the quality of services provided, achieving the following:

- 2 internal monitoring reviews of the service-delivery process, with 18 case files reviewed
- 4 internal monitoring reviews analyzing expired Individualized Plans for Employment (St.12), with 282 case files reviewed
- 3 internal monitoring reviews of the service-request process (60-day analysis in St.02), with 146 case files reviewed
- 4 internal monitoring reviews of the eligibility-determination process (St.10), with 72 case files reviewed
- 5 internal monitoring reviews of the development of the Individualized Plan for Employment (St.12), with 50 case files reviewed
- 2 internal monitoring reviews of the training process (St.18), with 18 case files reviewed
- 1 internal monitoring review of cases ready for employment (St.20), with 7 case files reviewed

- 2 internal monitoring reviews of the stabilization, transition to extended support, and closure process (St.22), with 16 case files reviewed
- 3 internal monitoring reviews of the pre-employment transition process, with 75 case files reviewed
- 1 internal monitoring review of the work-experience process for evaluative purposes/extended evaluation (St.06), with 15 case files reviewed
- 2 internal monitoring reviews of referrals from the State Insurance Fund Corporation, with 16 case files reviewed.

Strategy:

- Provide technical assistance based on the findings of the processes for monitoring and identification of needs by the central level or regional personnel.

Progress Report:

VRCSO provided 2,315 technical assistances.

The QCPMO provided eleven (11) group technical assistances to VR Counselors, through electronic communication, on specific topics related to performance indicators, as detailed below:

Date	Topic
December 4, 2024	Required Fields for Recording Credentials and Measurable Skills Gained (MSG)
December 12, 2024	Post Exit follow ups and periods to record or edit information
December 18, 2024	Editing Post-Exit Quarters and Retention Coding

Date	Topic
January 8, 2025	Important reminders about Credentials recording
February 11, 2025	Data Element #85 (for MSG calculation)
February 21, 2025	Instruction about the Placement screen
March 24 and June 26, 2025	Reminder about Credential recording before case closure
May 21, 2025	IPE information, Barriers, Enrollment, Credentials, MSG, Post Exit and other fields.
June 26, 2025	Credential recording before case closure

The QCPMO also provided:

- Individual technical assistance was provided to VR Counselors during the period as part of the error-correction process in data entry during case management.
- Through the Project Management unit of the OCCGP, a total of 379 orientations/technical assistances were provided, and participation was carried out in six (6) informal meetings with staff from the programmatic offices at Central Level.

Strategy:

- Establish quotas for the SEMC of consumers placed in a regular job by the personnel of said centers, as well as employment experience coordination quotas.

Progress Report:

SEMC placed 113 consumers in Regular Employment.

Strategy:

- Establish quotas for the coordination of employment experiences carried out directly by the SEMC.

Progress Report:

SEMC coordinated 24 employment experiences in competitive employment.

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

Negotiated levels and performance for PY 2024:

Performance Indicator	Negotiated Level for PY 2022	Achievement
Employment Second Quarter After Exit Quarter	41.00%	28.60%
Employment Fourth Quarter After Exit Quarter	41.70%	33.10%
Median Earning Second Quarter	$4,600	$4,800
Credential Attained	32.20%	15.10%
Measurable Skills Gain	43.60%	42.30%

The VRA was unable to meet the negotiated levels in four of the five indicators. The three most affected indicators were: employment in the second quarter after exit (for cases closed between July 2023 and June 2024), employment in the fourth quarter after exit, and credentials obtained (for cases closed between January and December 2023). The deficiencies in meeting the established performance indicators are attributed to the following factors:

Employment Rate in the Second Quarter After Exit

Counselors closed most cases between April and June 2024. Cases closed during the last quarter of the Program Year have less time available to complete post-exit follow-up, which reduces the

number of cases that meet the requirement when the necessary data are not obtained within the six-month window assigned for this purpose.

Employment Rate in the Fourth Quarter After Exit

Between October and December 2023, the VRA closed a significant number of inactive cases that would be included in the performance calculations for PY 2024. Because these cases were closed due to the inability to establish contact, there was an inherent risk of not being able to obtain post-exit employment information, which ultimately occurred. Most of these individuals also did not appear in employment records (UI wage files), resulting in a performance percentage for this indicator that was significantly lower than in previous years and below the negotiated target. It is important to note that, prior to beginning the indicator-negotiation process, the VRA had previously notified that this would affect this indicator's performance during PY 2024.

Credentials Attained

This indicator was also calculated during PY 2024 for inactive cases closed between January and December 2023. Most of these cases did not have a credential record, as the information could not be obtained due to the lack of contact with the participant both before and after case closure.

To emphasize the importance of complying with performance indicators and the timeframes for data entry in the case-management system, the Office of Quality Control and Programmatic Management provided ongoing training and technical assistance to staff at the Counseling Service Centers. In addition, it reviewed and updated visual and explanatory resources, which were published on the agency's internal page so that staff could access them at any time. After the monitoring visit in June 2023, additional information was shared with the Directors of the Counseling Centers, Counseling Supervisors, and Vocational Rehabilitation Counselors, highlighting the advantages of closing as many cases as possible during the first two quarters of the program year, as this provides more time to complete second-quarter follow-ups.

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).

During PY 2024 the VRA carried out the following activities using innovation and expansion funds:

Activity: Continue funding the SCR and CILs to assist and support its operations as well as developing, in conjunction with the VRA, better opportunities for employment and independent living for our applicants/consumers.

Progress Report: The VRA provided a fund allocation to both councils. Furthermore, it maintains its representation in the agency as well as its collaboration with both councils.

Invoices processed (expenditures) during PY 2024 were:

SRC: $123,904.88

ILC: $91,849.46

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.

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.

The VRA has developed the following goals and plans for the distribution of Title VI, Part B funds:

Goal A

Continue to provide services to consumers identified for supported employment modality.

Goal B

Maintain a level of satisfaction of 85% of those consumers who received supported employment services at the closure of the case.

Plans, Strategies:

- Use other sources of funding, in addition to the ones from Title VI, Part B, needed to expand the provision of supported employment services.
- At the Support and Employment Modalities Centers (SEMC), receive and evaluate at least 170 new candidates for Supported Employment services, referred from the VRC.
- Contract and support community rehabilitation programs (CRPs) throughout the Island so that at least 80 consumers, who received supported employment services, are able to achieve an employment outcome.
- Provide services at the CRP to at least 170-180 new cases during the period.
- Expand outreach in order to attract other potential service providers. This, by providing orientations in graduate schools (e.g., counseling, occupational therapy) that might develop projects to provide supported employment services as part of internships and through greater dissemination in the media, among others.
- Strengthen the provision of supported employment services through training and technical assistance to the staff of the CRPs. The Support and Employment Modalities Office (SEMO) and the Support and Employment Modalities Centers (SEMC) will provide such technical assistance in aspects such as:

1. Guidance to new proponents about supported employment services, as requested.
2. Other aspects related to the provision of supported employment services and extended supports services.

- Continue administering satisfaction surveys of the consumer in terms of the services received in the CRPs and in the SEMC, in order to identify areas to be strengthened or improved.
- Continue conducting monitoring interventions to the CRPs in order to validate compliance with the provision of services established in the contracts.

Distribution of Title VI, Part B funds:

The estimated total of projected funds for the provision of supported employment services for is $2,720,000.00 distributed as follows: $300,000 from Title VI-B for the contracting of a CRP; and $2,420,000.00 from Title I for the contracting of other CRPs and for expenses related to the supported employment services.

Use of Title VI funds after placement is set forth for the PRCs.

VRA established Regulatory Communication 2022-10 to address findings regarding SE A & B grants. We will incorporate detailed description of the process to identify SE-B grant on Youth with significant disabilities and 10% match.

3. Supported employment services may be provided with Title 1 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.

Quality:

The *Workforce Innovation and Opportunity Act* (WIOA) of July 22 of 2014, emphasizes on the provision of the supported employment services for the consumers with the most significant disabilities. Therefore, the VRA in its mission to integrate the people with disabilities into the

labor force and towards a more independent living promotes the provision of the supported employment services leading to an employment outcome.

The Support and Employment Modalities Office (SEMO), at the central level of the VRA, intends to collaborate, provide assistance and facilitate the applicability of the public policy to the Support and Employment Modalities Centers (SEMC), at the regional level, on career development services, services to employers and development of support and employment modes for the consumers. The SEMO staff contributes with other operational/administrative offices of the VRA, in the coordination and collaboration of efforts regarding the assessment services and the programmatic monitoring and interpretation of data/relevant information to ensure compliance with the VR Portion of the Unified State Plan and the Strategic Plan of the agency.

The VRA, through its SEMC, develops inter/transdisciplinary work teams to ensure that the supported employment services offered by the CRPs are provided uniformly, agile and responsive to the needs of the consumers with the most significant disabilities.

SEMO and SEMC staff also carry out monitoring activities with the purpose of verify compliance, project development, quality of services, identify limitations, use of resources, and consumer's participation, among others.

Scope and extent:

Individuals can receive up to 24 months of supported employment services, or more if necessary to achieve job stabilization. In addition, youth with disabilities may receive up to four years of extended services until the youth reaches 25.

The VR counselor identifies those consumers with the most significant disabilities who could benefit from supported employment, in accordance with the federal provisions set forth in 34 CFR 361.34. Such identification begins with the initial interview, the analysis of medical evidence, the analysis of pre-employment skills and any other aspect relevant to the evaluation process.

The supported employment modality is provided through the SEMC of the VRA; which offer support to the VR counselor in order to validate the vocational strengths and needs of the

applicants/consumers, as well as to promote them towards competitive integrated employment under such supported employment modality. Prior to the consumer's referral to the SEMC, he may receive services in the center of Assessment and Adjustment Centers (AAC) of the VRA in order to be evaluated in the following areas:

- Personal skills, daily/family/community living
- Cognitive-Psychosocial skills
- Perceptual-Psychomotor skills
- Training, Job and Work skills

The referral to the AAC will identify that the consumer will be sent to a community rehabilitation program (CRP) to be serviced under the supported employment modality, whereby the evaluation process must have an ecological approach.

The supported employment process has been framed within the following five (5) stages developed for the provision of these services:

Stage I. Determination of Needs

- Revision of documents: assessment of pre-employment skills, needs and support resources
- Comprehensive situational evaluation
- Determination of needs through profile evaluation
- Support: consumer and family
- Drafting of the Intervention and Support Plan for Placement in Supported Employment

Stage II. Occupational Preparation

- Ecological evaluation
- Possible revision of the Intervention and Support Plan for Placement in Supported Employment

- Continuous support

Stage III. Placement Services

- Marketing Plan
- Promotion
- Occupational analysis
- Job proposal
- Reasonable accommodation
- Recruitment process
- Revision of the Intervention and Support Plan for Placement in Supported Employment (if it applies)
- Meetings with the employer and the family
- Continuous support

Stage IV. Job Retention, Intensive and Moderate Training

- Intensive and moderate training
- Development of natural support networks
- Revision of the Intervention and Support Plan for Placement in Supported Employment (if it applies)
- Evaluation/monitoring
- Submittal of reports
- Meetings with the employer and the family
- Continuous support

Stage V. Stabilization, Transition to Extended Support, and Closure within 90 Days

- Meetings with the employer and the family
- Beginning of the employment monitoring phase (minimum of 90 days)
- Consumer's performance evaluation carried out by the employer, supervisor and job coach.
- Identification of extended support to be provided by family, employees (co-workers), and community.
- Satisfaction survey about services provided to consumer/family/employer/counselor.

The previous information about quality, scope and extent of services apply also to youth. The VRA will continue to provide SE and Extended Services to youth with the most significant disabilities. Through CRIS case management system, the SEMC will identify those consumers between ages 14-24.

The timing of transition to extended services:

In accordance with WIOA, the VRA will make resources available for extended services to youth with more significant disabilities, for a period not to exceed four (4) years. These services will be provided through contracting of CRPs. The SEMC Analysts will receive the request for extended support services from employers and will negotiate with the CRP the service to be provided and the number of interventions needed to stabilize individual in employment. An authorization for services document will be created on the case management system.

In order to improve the quality, the scope and the extent of the supported employment services, the VRA is committed to meet the goals and the strategies established and described in the previous section e.2.

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 C.F.R. §363.4(a) and 34 C.F.R. § 361.5(c)(19)(v).

The VRA issues an annual public announcement for the contracting of CRPs that provide supported employment services to consumers with the most significant disabilities. The VRA currently maintains contractual agreements with CRPs across the island.

In accordance with WIOA, the VRA will make resources available for extended services to youth with more significant disabilities, for a period not to exceed four (4) years. These services will be provided through contracting of CRPs. The Support and Employment Modalities Centers' (SEMC) Analysts will receive the request for extended support services from employers and will negotiate with the CRP the service to be provided and the number of interventions needed to stabilize individual in employment. An authorization for services document will be created on the case management system.

At present, there is no procedure to offer extended services to adults. Currently, they rely on natural supports. However, the VRA will work with it.

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 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. Estimates for next Federal fiscal year—

A. VR Program; and

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If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

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)
Not applicable	38,000	25,000	28,320,000.00	0

B. Supported Employment Program.

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Note, please do not edit the table header or formatting. Only edit the table contents.

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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)
Not applicable	538	170	2,720,000.00	0

g. Order of Selection

1. 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.

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

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

2. For VR agencies that have defined priority categories describe—

A. The justification for the order

Not applicable.

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

Not applicable.

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.

Not applicable.

3. Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

Not applicable.

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 C.F.R. § 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 C.F.R. § 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 State 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 of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

B. 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;

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.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Counseling staff	114	158	160
Support staff	245	320	320
Administrative	250	310	310
Other staff	1	0	1

D. Ratio of qualified VR counselors to clients:

The current ratio is approximately 348 clients per VR counselor (39,745 active cases/114 VRC).

E. Projected number of individuals to be served in 5 years:

To articulate the Agency's functioning to address the needs of the population it serves, the VRA requires professional personnel related to the rehabilitation field, occupying various positions, as well as other support and administrative professionals. Support professionals also provide direct service to applicants/consumers, while the administrative staff contributes to the continuity of other necessary processes for the operation of the agency and the achievement of programmatic goals. As of September 30, 2025, the VRA has a payroll of 610 employees, of which 114 are VR Counselors managing caseloads, and the projection is to attend an estimate of 39,000 people with disabilities during program years 2026 and 2027.

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.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Puerto Rico, Río Piedras Campus	Rehabilitation Counseling Graduate Program	42	19
Pontifical Catholic University of Puerto Rico, Ponce Campus	Rehabilitation Counseling Graduate Program	18	6
Central University of Bayamón	Rehabilitation Counseling Graduate Program	0	2
Central University of Bayamón	Bachelor of Psychology	41	2
Central University of Bayamón	Bachelor of Social Work	25	10
University of Puerto Rico, Medical Sciences Campus	Occupational Therapy	64	16
University of Puerto Rico, Medical Sciences Campus	Physical Therapy	78	20
University of Puerto Rico, Medical Sciences Campus	Master of Speech Pathology	34	14

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Puerto Rico, Medical Sciences Campus	Nursing	213	85

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.

The VRA's institutional mission is to provide vocational rehabilitation services aimed at the successful integration of people with disabilities into the workforce and the enjoyment of a more independent life. For this purpose, the VRA has professionals committed to public service, duly qualified to attend, in an agile and responsive manner, the vocational rehabilitation and independent living needs of people with disabilities, with priority given to those with the most significant disabilities.

To guarantee that we have the best qualified and fully trained personnel to provide services to people with disabilities, we offer professional development opportunities to our human resources. Also, we take into consideration their needs and recommendations for the best functioning of the agency.

Puerto Rico has various institutions of higher education that are preparing professionals in the rehabilitation field. The VRA has agreements with two (2) universities that prepare professionals in the rehabilitation counseling field. The purpose of such agreements is to provide the students the opportunity to carry out their practicum in facilities of our agency. In addition, the VRA recruits graduates from these institutions and others:

- University of Puerto Rico (UPR)- is the only public institution of higher education in Puerto Rico. It has its main campus in Río Piedras with 10 off-campus sites throughout the Island. The Graduate Program in Rehabilitation Counseling is at their Río Piedras Campus.
- UPR, Medical Sciences Campus, has the following programs: Occupational Therapy; Physical Therapy; Master's Degree in Speech Pathology; and Nursing.
- Pontifical Catholic University of Puerto Rico (Ponce) has Rehabilitation Counseling programs.

The VRA, through the Office of Labor Affairs and Human Resources and its divisions, is responsible for developing, updating, and implementing a plan for recruiting, preparing, and retaining qualified personnel to meet current and projected personnel needs. To comply with such requirement, the VRA will continue to carry out the following procedures and activities:

- Analysis and development of strategies based on the need for recruitment, reclassification, training, or any other requirement related to human resources.
- Provide advice and support on matters concerning the management of the agency's human resources, maintaining close coordination with the program area.
- Maintenance of a human resources inventory involving job classification, existing vacancies, identification of candidates for retirement, and succession planning. This information is analyzed annually to determine employment patterns, positions that are difficult to recruit, and the number of employees with 25 or more years of service.
- Projections of future needs for human resources (in a term of 1 to 5 years), by number and type of employee, emphasizing the staff that offers direct service to people with disabilities.
- Provide training and promote employee development.
- Establish objectives and types of training activities that will be offered to employees, to meet the programmatic and administrative commitments of the agency.

- Coordinate the training of VRA personnel with universities and other institutions that prepare professionals related to the field of rehabilitation.
- Maintenance of efforts to continue recruiting qualified personnel with disabilities. The VRA has rehabilitation counselors with diverse disabilities. We continue to emphasize compliance with Law 81, as amended, known as the Equal Employment Opportunity Law for Persons with Disabilities. As part of the evaluation of exam applications, an additional 5 points are awarded to anyone who shows evidence of having some type of disabling condition.

The VRA recruits without distinction of age, race, color, gender, social or national origin, social condition, political or religious ideas. Our agency recruits based on the applicant's qualifications. The VRA Puerto Rico is the only Designated State Unit in the nation with more than 99% of its population being a minority (Hispanics and/or Spanish-speakers).

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.

As established in the Procedures Manual for the Training of All Staff of the Vocational Rehabilitation Administration, the VRA promotes and emphasizes the continuing education of its employees. Therefore, it carries out the following activities to ensure having qualified staff:

- Identification and communication of training needs.
- Analysis and development of strategies based on training needs.

- Design of training activities to address topics concerning administrative/programmatic issues relevant to the VR program.
- Planning of training activities as a result of the needs identified in the needs assessment study, monitoring reports and performance evaluations.

Trainings to the newly recruited VR counselors cover topics such as: services delivery process, performance indicators and the State Plan, among others.

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

The Program established under Act 264 of 2000, known as the Puerto Rico Assistive Technology Program Act (PRATP), as amended, is responsible for promoting changes in the public and private systems for the inclusion, independence and self-sufficiency of people with disabilities through the use of assistive technology. To do this, it maintains collaborative agreements with government agencies. The VRA maintains an agreement with the PRATP, which is under the University of PR's Medical Science Campus, for the exchange of resources, knowledge, and experience in matters of assistive technology.

The VRA offers assistive technology services in its six regions under the following categories: visual, auditory, mobility, communication, independent living, cognitive area, and access to computers. Services are provided by Occupational Therapists, Physical Therapists, Audiologists, Certified Teachers, Speech-Language Pathologists, Specialists in Services for the Blind and Visual Rehabilitation. These professionals have the required credentials and stay current in the field of AT. To this end, the Agency benefits from the collaboration with the PRATP, since its specialists offer training to VRA personnel on topics such as:

- Low, medium and high technology AT equipment
- AT legislation
- AT integration to assessment and adjustment processes

- AT alternatives for employment and independent living
- AT for specific populations (blind, learning disabilities, mobility impairments)
- New equipment on the market and free equipment alternatives
- Low cost or homemade AT equipment alternatives, among others

These and other training provided to VRA personnel have contributed to keeping their knowledge and skills updated, in turn influencing the provision of services to applicants/consumers, facilitating employment and independent living outcomes.

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.

For the purpose of acquiring and disseminating significant knowledge of research and other sources to professional and paraprofessional staff of the agency, and also regarding the amendments to the Rehabilitation Act made by WIOA, the VRA has established the following procedure:

1. Presentation of the Comprehensive Assessment of Rehabilitation Needs results to staff.
2. Sending, through internal email, links to articles or information resources related to the rehabilitation field.
3. Collaboration with the Graduate School in Rehabilitation Counseling of UPR so that they share with the agency findings of research studies related to the rehabilitation field.
4. Allowing staff participation in continuing education courses, many of which contain information about research and evidence-based practices and strategies.
5. Trainings, technical assistance and normative communications related to the amendments to the Rehabilitation Act made by WIOA.

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.

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:

In Puerto Rico, the rehabilitation counseling profession is regulated by Law 58 of May 7 of 1976, as amended, known as the Regulatory Law of the Rehabilitation Counseling Profession in Puerto Rico. This legislation establishes that in order to practice as a rehabilitation counselor, the person must have a master's degree in Rehabilitation Counseling and a current state license issued by the appropriate Board of Examiners. It is also required that the professional maintains active his credentials and licenses in the Professional Registry of the Office of Regulation and Certification of Health Professionals, be a member of the College of Rehabilitation Counseling Professionals of Puerto Rico and comply with hours of continuing education. The VRA recruits personnel who meet these requirements in order to ensure the highest standards of the rehabilitation counseling profession.

Similarly, certification or license is required as a condition for employment, benefits and wages for: teachers, physical therapists, occupational therapists, speech/language pathologists, social workers, and psychologists, among others.

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.

Currently, the VRA staff receive continuing education to keep them updated regarding issues related to people with disabilities. The Agency has developed the following strategies to maintain personnel standards consistent with the highest requirements of the state and applicable to the profession or discipline in particular:

- Annual review of certifications, licenses and continuing education of professions or disciplines
- Continue providing the staff with the necessary education and training for the optimal performance of their duties.
- Maintain an updated record of training, workshops, training, among others, offered to staff.
- Identify staff retraining needs to strengthen the performance of their duties.
- Annual evaluation of staff performance
- Reinforce working relationships with the local DOL to provide updated information regarding the labor market through formal trainings.

The agency's staff also benefits from the training provided by resources such as:

- College of Rehabilitation Counseling Professionals of Puerto Rico (CPCR): Rehabilitation Counselors
- University of Puerto Rico
- VRTAC-QM
- VRTAC-QE
- Others

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.

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The agency, in its vision of being the leading agency in providing services to people with disabilities; provides staff with the necessary training and workshops to meet the communication needs of deaf, blind, and deaf/blind applicants/consumers. For this reason, agency staff participate in related training activities. In turn, the VRA has four (4) interpreters for the deaf who can be used when necessary to serve applicants or eligible individuals.

Since Puerto Rico is a Spanish-speaking country (English is used as a second language), we can communicate in the native language (Spanish) of our applicants/consumers. However, if an applicant/consumer only speaks English, we can also communicate in that language. In addition, the VRA can provide clients with alternative formats such as Braille and large print, among others.

The VRA installed a video interpretation system through the VRA facilities, which facilitates communication with the deaf population, regardless of whether the interpreter is physically in the place where the applicant/consumer requires the service.

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.

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.

In Puerto Rico, the Associate Secretary for Special Education and the VRA are in two different state departments (PRDE and PRDOLHR). The first one is responsible for the implementation of

Public Law 108-446, as amended, known as the Individuals with Disabilities Education Improvement Act (IDEIA); the second one is responsible for the implementation of the Rehabilitation Act of 1973, as amended, and State Law 97-2000, as amended, known as the Vocational Rehabilitation Law of Puerto Rico. In addition to the aforementioned legislation, the State Law 51-1996, as amended, known as the Integral Educational Services for Persons with Disabilities, provides for the coordination to be achieved between various local agencies to ensure an effective transition of young people with disabilities coming from the Department of Education. Both agencies maintain cooperative ties related to the development of their respective human resources and as such, have been planning, developing, offering and/or participating in training activities since 1987. Some of the topics covered in such training include: transition from school to work; vocational evaluation; supported employment; IDEIA; Americans with Disabilities Act (ADA), Public Law No. 101-336, as amended; Workforce Innovation and Opportunity Act (Public Law 113-128 of July 22 of 2014); among others. In addition, both agencies are members of an advisory committee, which meets periodically to plan and join efforts in the development and implementation of transition services from school to work.

The efforts and alliances carried out under collaborative agreements with the PRDE, as well as with the PRDOLHR and its components, are conducive to the development of strategies and activities to comply with federal regulations. The VRA is responsible for monitoring the cooperative agreement with the DE. As part of this commitment, the agency participated in meetings with the Special Education Advisory Committee.

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.

VRA has the responsibility to comply with the requirements of Chapter 34 of the Federal Regulations Code (34CFR), Section 361.22, which states that the State Plan must contain plans, policies and procedures for coordination between the Designated State Unit (VRA in Puerto Rico) and the Department of Education (DE) to facilitate the transition of students with disabilities, ages 14-21, from school to vocational rehabilitation services.

Similarly, the VRA has an interagency agreement as a result of the implementation of Law 51, known as the Law on Integrated Educational Services for Persons with Disabilities, of June 7, 1996. This Law assigns responsibilities to various government agencies for the purpose to provide services in a coordinated manner to people with disabilities.

The responsibilities assigned to the VRA by Law 51 are the following:

1. Evaluate, throughout the vocational rehabilitation counselor, the cases referred, in order to determine their eligibility for services, as established by state and federal guidelines.
2. Implement and provide independent living and vocational rehabilitation services to people with disabilities with the capacity to perform in some type of work, based on state and federal legislation.
3. Design an Individualized Plan for Employment (IPE), according to the needs of the person with disabilities and in accordance with current regulations. This plan includes:

- Application of guides and programmatic procedures for the provision of services
- Beginning and ending date of services
- Employment outcomes (regular employment, supported employment, self-employment or any other innovative option)

- Projected date for the achievement of the employment outcome
- Analysis to evidence the functional limitations of the consumer in relation to the employment outcome, outcomes of informed choice and the programmed services
- Recommended VR services which are necessary to achieve the selected employment outcomes
- Comparable services and benefits
- Costs of services
- Evidence of the financial participation negotiated between the VR counselor with the consumer/family, as applicable
- Evaluative criteria
- Specific responsibilities of the VRA
- Responsibilities of the consumer/representative
- Coordination with educational agencies
- Signatures of the parties and dates when plan is developed and approved
- Evidence in the IPE of the participation of the consumer (his own words) regarding the informed choice process and other actions taken during his VR process

4. Collaborate and participate in the drafting and implementation of the transition plan to adult life, whenever appropriate.
5. Provide Pre-Employment Transition services to students with eligible or potentially eligible disabilities.

The VRA recognizes the importance of the transition process in the youth with disabilities and will maintain its commitment in that it is carried out in accordance with federal and state regulations. The Agency is developing with the PRDE joint activities in order to strengthen the

provision of transition services in general, and especially the pre-employment services to those youth with the most significant disabilities.

The VRA has a formal agreement with the SEA and the local DOL regarding Transition Services, which also includes responsibilities of both agencies related to the procedures for exchanging documentation regarding WIOA Section 511, as follows:

-VRA's Transition Analysts will provide orientation to the local Department of Education staff regarding their responsibilities for compliance with Section 511 requirements and completion of an Orientation from VRA to DE Certification Form.

-Local DE has the following responsibilities:

1. During the next 30 days after completion of each Transition activity or service, DE will send to VRA a Certification of Transition Service, as established in Section 397.30 of the CFR and WIOA's Section 511.

2. Provide to the youth with disabilities evidence of transition services completion, among others, within the next 30 days after each activity or service completion, in accordance with CFR 397.20 and WIOA Section 511.

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 C.F.R. § 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;

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;

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;

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;

E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

F. Assurance that, in accordance with 34 C.F.R. § 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 C.F.R. § 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.

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:

As mentioned in the previous section, in Puerto Rico Law 51 of June 7, 1996, as amended, the VRA through its operational components and the Department of Education through its Associate Secretariat of Special Education develop and implement a Transition program for young people with disabilities from school to the world of work for students with disabilities. Consultation and technical assistance may be provided using alternative means for meeting participation.

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:

The VRA and the Department of Education maintain constant communication and collaboration with the purpose of developing new strategies for students with disabilities. Some of the responsibilities of both agencies are the following:

A. Vocational Rehabilitation Administration:

1. The Vocational Rehabilitation Administration, in coordination with the Department of Education, will provide Pre-employment Transition Services (PRE-ETS) to potentially eligible students with disabilities. Pre-employment services for students in the transition process are the following:

- Job Exploration Counseling
- Work Based Learning Experiences
- Counseling on Enrollment Opportunities
- Workplace Readiness Training

- Instruction in Self Advocacy

2. The Vocational Rehabilitation Administration staff (Transition Counseling Services Analysts who work Transition or Vocational Rehabilitation Counselors) may provide technical assistance to Education Department personnel by sharing, in orientations or meetings, information that contributes to such personnel have a better understanding about:

- Medical and other aspects related to impediments.
- Requirements to request services and eligibility criteria of the Vocational Rehabilitation Administration.
- How school personnel can assist the student in preparing to receive the services of the Vocational Rehabilitation Administration.
- Identification of transition needs, such as assistive technology, orientation training and mobility; in other aspects.
- The scope of pre-employment transition services and the requirements to benefit from them under WIOA.
- The responsibilities of the Educational Agency compliance with Section 511 of WIOA in order to complete the Personnel Orientation Certification form of the Department of Education by the Vocational Rehabilitation Administration.

3. Offer guidance to parents and to students with disabilities, coordinated with the contact person identified in each school, about the Vocational Rehabilitation Administration, application process and scope of services to be provided to people with eligible disabilities, in addition to transition services of pre-employment and the criteria to receive them. These orientations may be offered in general orientation activities coordinated by the school, and in the meetings of the Programming and Location Committee (COMPU), among others.

4. Evaluate through the Vocational Rehabilitation Counselor, the referred students to determine their eligibility for services, as established by applicable federal and state laws and regulations.

5. Inform in writing, to the official of the agency that refers the case, the criteria used to determine that the student is or are not eligible to receive services from the Vocational Rehabilitation Administration and the basis on which that determination has been made.

6. Collaborate and participate in the drafting and implementation of the transition services established in the Individualized Educational Program (PEI) of the school to adulthood, every time the person is cited or convened for that purpose. Such participation may be face-to-face, by telephone (teleconference), virtual or any other permissible means.

7. Design an Individualized Plan for Employment (PIPE), according to the needs of the person with disabilities eligible for the Vocational Rehabilitation Administration, on or before the student leaves school.

8. Provide vocational rehabilitation services and other transition services necessary, identified, and recommended in the Individualized Plan for Employment, for vocational rehabilitation of the eligible student in the context of their employment goal.

9. Design and implement mechanisms for the collection of statistical data.

B. Responsibilities of the Department of Education:

1. Identify the population to be referred for evaluation of the Vocational Rehabilitation Administration, according to the eligibility criteria established by the applicable laws and regulations, through the procedure agreed by the agencies.

2. Any referral to the Vocational Rehabilitation Administration must include the following:

- Student's Social Security Number
- Updated Psychological Medical Evidence
- Academic History and Report Cards
- Psychosocial History
- Vocational Evaluation based on Law No. 263-2006

- Copy of the Certification of Functional and Pre-Employment Academic Skills based on Law 53-2016
- Copy of the Individualized Educational Program (PEI)
- Services Plan. Section 504 or others that apply
- Any other document that applies

In the case of pre-employment transition services, the Department of Education will offer and certify the following information:

- Student's Social Security Number
- Date of birth
- Age
- Race
- Ethnicity
- School of origin and town
- Town of residence of the student
- Grade enlisted
- If the student receives special education or Section 504 services
- Any others that may apply

3. Coordinate and offer the provision of services considering the Transition Services developed in the Individualized Educational Programs to ensure an effective transition of young people with disabilities to post-school life.

4. Coordinate with the officials of the Vocational Rehabilitation Administration orientations directed to parents, students and school staff related to the services available to students in the process of transition to adult life.

5. Provide academic and vocational services to the population with disabilities, according to applicable federal and state laws and regulations.

6. Collaborate with the Vocational Rehabilitation Administration in the objective of providing placement and follow-up services to students with disabilities until they graduate from high school, turn twenty-one (21) years of age or complete education services special.

7. Provide through their schools, the human resources for the development of the necessary basic academic and occupational skills, according to the needs identified in the results of the vocational evaluations and according to what is established in the Individualized Educational Program (PEI).

8. Provide those related services, support and technological assistance required to achieve the educational objectives of the student in the school environment or context.

9. Evaluate, together with the staff of the Administration of Vocational Rehabilitation, the achievements in its implementation.

10. Notify the Vocational Rehabilitation Administration, fifteen (15) calendar days in advance, when the participation of its officials in a COMPU meeting is required, for the development of transition services in the PEI.

11. Identify alternative means of participation in COMPU meetings, such as teleconferences, virtual and/or any other means that are permissible.

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:

The Vocational Rehabilitation Administration, will use funds to provide Pre-employment Transition Services (PRE-ETS) to potentially eligible students with disabilities and vocational rehabilitation services to eligible individuals. Also, the VRA's Transition Counseling Services Analysts and Vocational Rehabilitation Counselors are highly qualified staff. The Department of Education will provide the educational and transition services established by law.

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:

1. Transition process for students with disabilities begins at schools through orientation provided by the Transition Counselor (TC) of the VRA, to teachers, students with disabilities and/or parents. As a result, meetings of the Placement and Programming Committee (PPC) take place, and decisions are made about IPE recommendations. A plan of action is developed, and the TC may accept the referral of the student with disabilities.

2. The PPC compiles medical information related to the student's disability and functional level at the time of the referral.

3. The TC sends those referrals to the Vocational Rehabilitation Counselors (VRC) at the corresponding VRA regional office and coordinates VRC participation in PPC meetings of eligible students with disabilities.

4. When existing information doesn't describe the current functional level of the student, the VRC will perform a preliminary evaluation and consult with the TC as to which evaluations may be available through the Department of Education to complete the evaluation process.

5. The VRC requests medical consultant's opinion under the following situations:

- When advice is needed about functional limitations caused by the student's physical or mental disability

- When clarification about medical aspects of disability is needed to facilitate VRC decision making process and service planning. Eligibility determination is made by the VRC.

6. Eligibility criteria will be applied considering physical and mental functional limitations, functional capacity, vocational interests, skills, abilities, life experiences and others, identified through the evaluation stages for eligibility determination.

E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment:

The VRA has a formal agreement with the SEA and the local DOL regarding Transition Services, which includes responsibilities of both agencies related to the procedures for exchanging documentation regarding WIOA Section 511, as follows:

-VRA's Transition Analysts will provide orientation to the local Department of Education staff regarding their responsibilities for compliance with Section 511 and completion of an Orientation Certification Form.

-Local DE has the following responsibilities:

1. During the next following 30 days after completion of each Transition activity or service, DE will send to VRA a Certification of Transition Service, as established in Section 397.30 of the CFR and WIOA's Section 511.

2. Provide to the youth with disabilities evidence of transition services completion, among others, within the next 30 days after each activity or service completion, in accordance with CFR 397.20 and WIOA Section 511.

F. Assurance that, in accordance with 34 C.F.R. § 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 C.F.R. § 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:

The SEA and LEAs will not enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 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.

The designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR Service:

The VRA continues to work with employers to identify opportunities for integrated competitive employment and career exploration. For this purpose, it has Support and Employment Modalities Centers (SEMC or CAME, by its acronym in Spanish), whose staff is responsible for working with employers. They contact new potential employers, as well as those who employ people with disabilities for the purpose of promoting employment opportunities and making their facilities available for career evaluation and exploration activities.

CAME also organize training activities for employers, through which their knowledge is increased regarding the population with disabilities and the benefits of using them, among other topics. Also, participate in job fairs, where information is provided on the services of the VRA and qualified candidates are marketed.

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

In compliance with WIOA, the VRA has been carrying out activities aimed at offering pre-employment transition and transition services aimed at helping students with disabilities to a successful transition to post-secondary life, as well as individuals with disabilities that we serve. See the Progress Report section for details of activities carried out (achievements).

Consistent with the mandate to provide pre-employment transition services to students with disabilities, the Vocational Rehabilitation Administration developed a Cooperative Agreement for

interagency coordination with government agencies, municipalities or private employers so that they participate in a Work Based Learning Experience, performing the tasks identified and agreed to, in compliance with the Workforce Innovation and Opportunity Act (WIOA). For these purposes, the pre-employment services area, when offering said activity, guides employers who will offer employment opportunities to students with disabilities who qualify, according to WIOA. This guidance has the purpose of establishing the responsibilities of the VRA and the employer. Likewise, at this time information about the services offered by the Vocational Rehabilitation Administration is provided.

l. 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 VRA has representation in the Assistive Technology Advisory Council of Puerto Rico in order to exchange professional knowledge and to continue referring consumers who could benefit from services such as building and adaptation of equipment, among others. The Council is composed by members representing government agencies and people with disabilities representing the public interest, and VRA's participation is mandatory. The main function of the Council is to respond and represent people with disabilities for the establishment, implementation and evaluation of the Puerto Rico Assistive Technology Program, which is under the University of Puerto Rico Medical Sciences Campus, in order to facilitate information, availability and access to assistive technology (AT). The Director of the VRA's Evaluation and Adjustment Office is the agency's representative at the Council. VRA's participation consists in attending meetings to:

- Provide information to facilitate changes or current processes improvement for AT service delivery to people with disabilities.
- Facilitate coordination of VRA consumers in the AT Annual Needs Assessment
- Offer recommendations for plan development in order to address AT needs, plans implementation and results evaluation.
- Share with members of the Council information about training opportunities on AT topics (forums, symposiums, conferences, etc.).
- Share information about local and federal legislation regarding AT services.

2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

At the moment, the VRA is not using services, facilities or a program carried out by the Under Secretary for Rural Development of the US Department of Agriculture.

3. Non-educational agencies serving out-of-school youth;

WIOA promotes that vocational rehabilitation agencies reach groups and entities that provide services to young people, including young people with disabilities, and makes direct reference to programs such as Job Corps. For this purpose, the Vocational Rehabilitation Administration (VRA) developed public policy to establish the referral process for the Job Corps Program (JC).

This is a free education and vocational training program administered by the federal Department of Labor, which provides services to at-risk youth between the ages of 16 and 24, with the purpose of preparing them for employment. This is a process that facilitates the exchange of referrals, orientations between programs, and the provision of services for those young people who are eligible to VRA.

- VRA will refer to Job Corps out-of-school youth who might benefit from their services (including training), and Job Corps will also refer individuals to VRA.
- VRA will send to JC reports about eligibility determination on those referrals.

- JC may provide information/training to VRA staff regarding services available at JC and any other topic identified or beneficial to both parties.
- VRA and JC will provide services island wide, according to their resources.

4. State use contracting programs;

VRA does not utilize services and facilities of agencies and programs with respect to state use contracting programs.

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.);

The Medicaid staff can provide VRA staff with information about the program and also orientations to help them identify individuals with disabilities not receiving services from Medicaid that may be potential beneficiaries. Receiving needed services from Medicaid is a way to provide adequate conditions to benefit from the vocational rehabilitation process to achieve competitive integrated employment. Although Medicaid participants can receive VR services with or without a formal agreement between agencies, and are currently receiving services from the VRA, the agency will coordinate a meeting with Medicaid representatives to discuss topics related to the scope and preparation of a formal collaborative agreement.

VR staff is attending interagency meetings with the local Department of Health and the extended services topic will be addressed. Other agencies' models will be evaluated.

6. State agency responsible for providing services for individuals with developmental disabilities;

The VRA participates actively in the meetings of the State Council on Developmental Disabilities (SCDD), providing input on topics discussed, as well as in other activities, such as discussion forums, that promote employment opportunities for this population. It also shared its employers' list with the SCDD and VRA staff is available to support their efforts in order to develop competitive integrated employment opportunities.

7. State agency responsible for providing mental health services; and

This Advisory Council of Substance Abuse and Mental Health of Puerto Rico is composed of government agencies, mental health patients and family members. It is supported by the Substance Abuse and Mental Health Services Administration (ASSMCA, by its Spanish acronym). This is the organization selected by the Health Insurance Administration of Puerto Rico to carry out operational functions of the Health Plan and offer treatment for mental health conditions, alcohol and drug abuse in the San Juan and Western regions. The VRA is a mandatory member of this council and participates in the planning for the provision of these services.

VRA participates as a member of the Advisory Council of Substance Abuse and Mental Health of Puerto Rico. The Council's mission is to promote compliance with federal public law and the public policy of the Commonwealth of Puerto Rico, in order to offer adequate mental health and substance abuse services and promote a better quality of life for people and their families. The Council's objectives are to:

1. Participate in the writing and implementation of the Block Grant, in accordance with Section 1915 (a) of the federal law.
2. Participate in the development of the State Plan for the Mental Health and Substance Abuse Services Administration.
3. Review and evaluate adequacy and distribution of mental health and substance abuse services in PR to identify service needs.
4. Advocate for people with mental health and substance abuse disabilities in PR, in order to guarantee establishment of a high-quality integrated service system.

Functions of each member, including VRA, are:

1. Attend meetings

2. Active participation in deliberation and vote processes

3. Staying informed and updated about matters of interest for mental health and substance abuse services improvements

4. Participate in activities and perform assigned tasks

5. Participate in the Council's working groups.

Every situation regarding an applicant/consumer is managed with the corresponding member. Annually, the VRA submits to the Council a report of mental health impairments attended in the Agency. On the other hand, cases with mental health conditions may request VRA services as self-applicants or through "Atención Primaria de Salud" (APS, by its acronym in Spanish), which are companies contracted by the Health Insurance Administration to offer mental health and substance abuse services to beneficiaries of the Government Health Care Insurance.

The VR Counselor maintains contact with the APS social workers or case manager in order to offer integrated services, including public health actions such as: diagnostic, prevention, and occupational services by the VRA.

8. Other Federal, State, and local agencies and programs outside the workforce development system.

The VRA has collaborative agreements with the following agencies, corporations and programs not carrying out activities under the Statewide Workforce Development System:

University of Puerto Rico

The VRA coordinates the placement in its own agency of internship as well as practicum students of the master's degree program in Rehabilitation Counseling. These students are a potential human resource to be recruited once their professional credentials are completed. Also, the Graduate School of Rehabilitation Counseling carried out the *Comprehensive Assessment of Vocational Rehabilitation Needs* during 2016-2017.

The VRA has VR counselors placed in the facilities of the Río Piedras and Mayagüez campuses of the UPR for the provision of services to eligible students. The VRA also maintains a collaborative agreement with the Humacao Campus and the Medical Sciences Campus of the UPR so that Occupational Therapy students will carry out practices in the VRA.

State Insurance Fund Corporation

The VRA maintains a *Contractual Agreement of Comprehensive Action for the Rehabilitation of Injured Workers* under the SIFC. Act 182-1951, as amended, authorizes the SIFC to invest in the vocational rehabilitation of its beneficiaries who have disabilities for work. The VRA receives an annual allocation of funds of $600,000, which is used to match federal funds.

Institute of Developmental Disabilities

The VRA maintains collaboration with and representation in the IDD in order to meet the service needs of the population with developmental disabilities. It has participated in activities aimed at the population with autism, which were coordinated by the IDD.

Caribbean Planning and Work Incentive Assistance Program

The VRA contains a public policy that those consumers who receive SSDI will be referred to this program. The purpose of the referral is that these beneficiaries who are interested in getting a job will be oriented as the impact that the salary will have on the disability benefits they receive, the counseling service needed for benefits planning.

Department of Veterans Affairs

The VRA participates in activities and meetings coordinated by this agency, in order to offer referred eligible veterans with disabilities access to the various services available to achieve competitive employment.

State Independent Living Council (SILC)

The VRA, SILC and independent living centers promote collaborative actions with other public or private organizations that offer services to the population with significant disabilities. They also join efforts to increase the opportunities for community support services for such population. The Normative Communication No. 2011-19 establishes the referral procedure to the independent living centers of those disabled persons who are not eligible for services under Title I, but who could benefit from services provided in such centers. The VRA allocates funds to the SILC for its operations under the Innovation and Expansion Section.

Department of Health- Division of Services for People with Intellectual Disability (DSPID)

The DSPID is based on a *Community-Based Service Plan*, whose main focus is the deinstitutionalization of people with intellectual disabilities. The VRA offers orientation to the staff of the DSPID and provides services to referred individuals who are eligible.

State Council on Developmental Disabilities

VRA supports and participates in activities related to services for people with developmental disabilities. Also attends assigned work committees.

Private IHE and Non-Profits

Carlos Albizu University. The VRA maintains a collaborative agreement with this university for the practicum of psychology students in our facilities.

The VRA maintains a collaborative agreement with Catholic University of Puerto Rico for the placement in our facilities of practicum and internship students of the Rehabilitation Counseling Department.

9. Other private nonprofit organizations.

Approval of Proposals:

In 2023, the VRA reviewed the guidelines for formalizing contractual agreements with private non-profit organizations. These guides are intended to guide the proponent regarding the principles and procedures for generating a service proposal. They offer an outline of how the proposals will be presented and the order that will govern them. Likewise, they include the documents that must be attached as part of the proposals submitted.

Currently, the VRA has the following guides:

- Guide for the preparation of proposals to offer services to VRA consumers under the Supported Employment Modality
- Guide for the preparation of proposals to offer Pre-Employment Transition Services
- Request for Proposal for the Comprehensive Statewide VR Services Needs Assessment

This contracting process begins with a Public Notice in written press, which establishes the deadlines for the collection of the Proposal Guide in reference and the deadline for the delivery of the proposal. Once both processes have passed, a Proposal Review Committee analyzes them according to the guidelines, and based on the results, they make recommendations to the Administrator, then beginning the hiring process.

In compliance with the established federal regulations, the VRA assigns responsibility to the programmatic areas of the agency to carry out monitoring activities to those organizations contracted for the purpose of verifying compliance, project development, services offered, difficulties encountered, use of resources, beneficiary participation, among other matters.

The VRA is willing to establish collaborative agreements with other nonprofit organizations that provide services to people with disabilities, with the purpose of receiving referrals and offering training.

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The VR agency must select the "Edit" button to review and agree to the VR State plan Assurances.

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR

The State Plan must include
Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The State Plan must include
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.

The State Plan must include
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.

The State Plan must include
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):

The State Plan must include
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA[1], and its State Plan supplement under title VI of the Rehabilitation Act;

[1] Public Law 113-128.

Enter the name of designated State agency or designated State unit, as appropriate

Vocational Rehabilitation Administration

2. In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (designated State agency or the designated State unit when the designated State agency has a designated State unit)[2]agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[3], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[4], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

Enter the name of designated State agency
Department of Labor and Human Resources

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency, or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[5], the Rehabilitation Act, and all applicable regulations[6], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. The designated State unit or, if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Dr. Rosa H. Lugo-Cabán

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Administrator

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Footnotes

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

Certification Signature

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Rosa H. Lugo-Cabán
Title of Signatory	Administrator
Date Signed	04/___/2026

General Education Provision Act Section 427 Assurance - Vocational Rehabilitation

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program. All applicants for new grant awards must include the following information in their applications to address this provision in order to receive funding under this program. (OMB Control Number 1894-0005)

The State Plan must include	Include
I assure that the proposed project complies with the requirements in section 427 of the General Education Provisions Act (20 U.S.C. 1228a).	Yes

Compliance can be found on the following page(s) of the application:

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.

The VRA has services available and accessible to all individuals with disabilities. For the purpose of promoting the participation in vocational rehabilitation services and supported employment, the personnel of the agency participate in community orientation activities. There is no difference as to the availability of services for groups of specific disabilities, or specific cultural or racial groups. Moreover, the VRA carries out transactions as necessary to continue ensuring that its facilities are accessible to all individuals with disabilities.

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?

No significant barriers have been identified that may impede equitable access and participation of students, educators, or other beneficiaries.

The followings are areas for improvement, based on the most recent CSNA (2023), and the actions VRA will take to address those:

1. Need to expand the dissemination of information about VRA in private schools and on the website:

- Orientations will continue to be provided in private schools and to homeschooling groups.
- Information material will be included on the VRA website and applicants will be guided in this

regard and on the Agency's social networks.

2. Need to streamline the provision of services:

- Public policies will be reviewed to streamline access and receipt of services.

3. Limitation of PRC:

- Notice for request for proposals will continue to be published.

4. Collaboration with employers:

- Meetings began with employers from various geographic areas to consider the process of notification of available positions and consumer referrals.
- Job fairs will be held.

5. Additional training on special conditions such as Autism and significant impairments:

- The PRVRA has been providing these trainings and will continue to do so.

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?

See the response to the previous question.

The final of four questions is:

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

The areas identified for improvement have been addressed and will continue to be addressed throughout the duration of the State Plan.

General Education Provision Act Section 427 Assurance - Supported Employment

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program. All applicants for new grant awards must include the following information in their applications to address this provision in order to receive funding under this program. (OMB Control Number 1894-0005)

The State Plan must include	Include
I assure that the proposed project complies with the requirements in section 427 of the General Education Provisions Act (20 U.S.C. 1228a).	Yes

Compliance can be found on the following page(s) of the application:

See the explanations recorded in the previous sections.

Performance Indicator Appendix

All WIOA Core Programs

Vocational Rehabilitation Program (Combined or General) - Vocational Rehabilitation Program Performance Indicators

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

The submission of expected levels is the first step in the negotiations process. Once the expected levels of performance have been submitted, State VR programs may begin negotiations with RSA's State Monitoring and Program Improvement Division. Each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the

Unified or Combined State Plan during the required two-year modification process) in accordance with 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers (ESE)

The ESE indicator has been defined in the ESE final rule and PY 2024 was the first year of data for the newly defined performance indicator. However, a minimum of at least two baseline years of data must be collected to support a statistical adjustment model that could produce sufficiently reliable estimates for the purposes of performance negotiations and state performance assessments. The Departments, in accordance with 20 CFR § 677.190(c)(4) and 34 CFR §§ 361.190(c)(4) and 463.190(c)(4), will collect and monitor state ESE performance results for at least PY 2024 and PY 2025 to establish a credible baseline and provide technical assistance. After PY 2025 data are collected the Departments will develop a statistical adjustment model for ESE in accordance with section 116(b)(3)(A)(viii) of WIOA. Since the ESE indicator is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs when feasible. While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	30.0		30.5	
Employment (Fourth Quarter After Exit)	35.0		35.5	
Median Earnings (Second Quarter After Exit)	4500.0		4500.5	
Credential Attainment Rate	25.0		25.5	
Measurable Skill Gains	50.0		50.5	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:	
1.	The Vocational Rehabilitation Administration is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA,[4] and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the Department of Labor and Human Resources [5] agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[6], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[7], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the

[4] Public Law 113-128.

[5] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[6] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[7] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 CFR part 361.

States must provide written and signed certifications that:	
	designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[8], the Rehabilitation Act, and all applicable regulations[9], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

[8] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[9] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

States must provide written and signed certifications that:	
7.	María M. Gómez-García has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The administrator has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. FOOTNOTES: [14] Public Law 113-128. [15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014. [16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph. [17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act. [18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR

States must provide written and signed certifications that:	
	part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations. [19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act. [20] Applicable regulations, in part, include the citations in footnote 6.

Additional Comments on the Certifications from the State:

Certification for Contracts, Grants, Loans, and Cooperative Agreements:

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of the fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions. Submission of this statement is a prerequisite for making or entering this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Certification Regarding Lobbying — Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal

contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of the fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the

required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Footnotes

Certification 1 Footnotes

*Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	María M. Gómez -García
Title of Signatory	Administrator
Date Signed	

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:	
1.	**Public Comment on Policies and Procedures:** The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
	Yes
2.	**Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:** The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1),

The State Plan must provide assurances that:	
	(22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
	Yes
3.	Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). (e) as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. (f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

The State Plan must provide assurances that:	
	(h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A). (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
	Yes
4.	**Administration of the Provision of VR Services:** The designated State agency, or designated State unit, as appropriate, assures that it will: (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.

The State Plan must provide assurances that:	
	(b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed

The State Plan must provide assurances that:	
	either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. (j) with respect to students with disabilities, the State: (i) has developed and will implement, (A) strategies to address the needs identified in the assessments; and (B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15),101(a)(25), and 113). (iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5.	Program Administration for the Supported Employment Title VI Supplement to the State plan: (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

The State Plan must provide assurances that:	
	(b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
	Yes
6.	Financial Administration of the Supported Employment Program (Title VI): (a) The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

The State Plan must provide assurances that:	
	Yes
7.	Provision of Supported Employment Services: (a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Appendix 1: Performance Goals for the Core Programs

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

Include the state's expected levels of performance related to the performance accountability indicators based on the primary indicators of performance described in Section 116(b)(2)(A) of the WIOA.

	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 – DWP			
	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) [10]				
Employment (Fourth Quarter after Exit)[11]				
Median Earnings (Second Quarter after Exit)				
Credential Attainment Rate				
Measurable Skill Gains				

[10] For Title I Youth programs, employment, education, or training.
[11] For Title I Youth programs, employment, education, or training.

	Title II – AEFLAP			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	12.0%		12.50%	
Employment (Fourth Quarter after Exit)	14.0%		14.5%	
Median Earnings (Second Quarter after Exit)	3,400		3,450	
Credential Attainment Rate	10.%		10.5%	
Measurable Skill Gains	57.80%		57.90%	

Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Wagner-Peyser Act Employment Service 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	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	VRP			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) [22]				
Employment (Fourth Quarter after Exit) [22]				
Median Earnings (Second Quarter after Exit [12]				
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				

Additional Indicators of Performance
1.
2.
3.
4.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAM

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, DWP, Youth Program, Wagner-Peyser Act Program, AEFLA P, and VRP — and submit relevant information for any of the 11 partner programs it elects to

include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it does not need to submit a separate plan or application for that particular program.24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

Career and technical education programs were authorized under Perkins V (20 U.S.C. 2301 et seq.)).

Please see *Guide for Submission of State Plans* (Guide) for full guidance on Perkins V planning requirements.https://s3.amazonaws.com/PCRN/docs/18300029Perkins_V_State_Plan_Guide_Revised_9-12-19-_Expires_4-30-22.pdf. If Perkins V is included in a WIOA Combined State Plan, the State must address the requirements listed below in Section II of the Guide in the Combined State Plan. All "Text Box" references below are in the Guide.

(a) Plan Development and Consultation

(1) Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in Section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State plan consultation under Section 122(c)(1) of Perkins V.

(2) Consistent with Section 122(e)(1) of Perkins V, each eligible agency must develop a portion of the State plan relating to the amount and use of any funds proposed to be reserved for adult career and technical education, post-secondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in Section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)

(3) Describe opportunities for the public to comment in person and write about the State plan. (Section 122(d)(14) of Perkins V)

(b) Program Administration and Implementation

(1) State's Vision for Education and Workforce Development

(A) Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and States that elect to include employment and training activities conducted under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the federal agency that administers the program. Similarly, States electing to include employment and training activities conducted by HUD would submit all other required elements of a complete State Plan for those programs directly to the federal agency that administers the program.

Technical education programs and programs of study are aligned with and address the education and skill needs of employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)

(B) Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)

(C) Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in Section

122(d)(2) of Perkins V, including the core programs defined in Section 3 of the WIOA (29 U.S.C. 3102) and the elements related to system alignment under Section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other federal programs, which may include programs funded in 1965. (Section 122(d)(3) of Perkins V)

(D) Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act. See Text Box 2 for the required uses of State leadership funds under Section 124(a) of Perkins V. (Section 122(d)(7) of Perkins V)

(2) Implementing Career and Technical Education Programs and Programs of Study

(A) Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V)

(B) Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 13225 will—

(i) promote continuous improvements in academic achievement and technical skill attainment.

(ii) expand access to career and technical education for special populations; and

(iii) support the inclusion of employability skills in study programs and career pathways. (Section 122(d)(4)(B) of Perkins V)

(C) Describe how the eligible agency will—

(i) Provide information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities), guidance and advisement resources available to students (and parents, as appropriate), representatives of secondary and post-secondary education, and special populations, and to the extent practicable, provide that information and those resources in a language that students, parents, and educators can understand.

(ii) facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points.

(iii) use State, regional, or local labor market data to determine the alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate.

(iv) ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations.

(v) coordinate with the State board to support the local development of career pathways and articulate the processes by which career

pathways will be developed by local workforce development boards, as appropriate.

(vi) support effective and meaningful collaboration between secondary schools, post-secondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other firsthand or inquiry-based learning activities; and

(vii) improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of a special population. (Section 122(d)(4)(C) of Perkins V)

(D) Describe how the eligible agency, if it opts to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college, high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)

(E) Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local businesses (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of their career and technical education programs. (Section 122(d)(12) of Perkins V)

(F) Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to Section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications in Section 134(b) of Perkins V.

(G) Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under Section 134(c) of Perkins V.

(H) Provide the eligible agency's definition for "size, scope, and quality" that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V

(I) Meeting the Needs of Special Populations

(1) Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations—

(i) will be provided with equal access to activities assisted under this Act;

(ii) will not be discriminated against, based on status as a member of a special population.

(iii) will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in Section 113 and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations.

(iv) will be provided with appropriate accommodations; and

(v) will be provided instruction and work-based learning opportunities in integrated settings that support competitive integrated employment. (Section 122(d)(9) of Perkins V)

(J) Preparing Teachers and Faculty

(i) Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals, to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

(c) Fiscal Responsibility

(1) Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

(A) Each eligible recipient will promote academic achievement.

(B) each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized post-secondary credential; and

(C) Each eligible recipient will ensure that the local needs assessment under Section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)

(2) Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—

(A) among career and technical education at the secondary level, or career and technical education at the post-secondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and

(B) among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members

of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)

(3) For the upcoming program year, provide the specific dollar allocations for each eligible recipient made available by the eligible agency for career and technical education programs and programs of study under Section 131(a)–(e) of the Act and describe how these allocations are distributed to local educational agencies, areas of career and technical education schools, and educational service agencies within the State. (Section 131(g) of Perkins V)

(4) For the upcoming program year, provide the specific dollar allocations for each eligible recipient made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.

(5) Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data were collected and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

(6) If the eligible agency will apply for a waiver to the secondary allocation formula described in section 131(a)—

(A) include a proposal for such an alternative formula; and

(B) describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds based on poverty (as defined by the Office of Management and Budget and revised annually in accordance with Section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)

(C) Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

(7) If the eligible agency will apply for a waiver to the post-secondary allocation formula described in section 132(a)—

(A) include a proposal for such an alternative formula; and

(B) describe how the formula does not result in a distribution of funds to eligible institutions or consortia with the State that has the highest number of poor individuals, and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V) Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

(8) If the eligible agency awards reserve funds to eligible recipients under section 112(c) of Perkins V, describe the process and criteria for awarding those funds.

(9) Provide the State's fiscal effort per student, or aggregate expenditures for the State, which will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort and indicates whether the baseline is a continuing or new level. If the baseline is new, please provide the fiscal effort per student or aggregate expenditures for the State for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

(d) Accountability for Results

(1) Identify and include at least one (1) of the following indicators of career and technical education program quality—

(A) The percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under Section 3(12) of Perkins V) graduating from high school having attained a recognized post-secondary credential.

(B) the percentage of CTE concentrators graduating high school having attained post-secondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or

(C) the percentage of CTE concentrators who graduated from high school participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

(2) Include any other measures (s) of student success in career and technical education that are statewide, valid, dependable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of "other" program quality measure(s) is optional for States.

(3) Provide the eligible agency's measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

(4) Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined performance levels or each of the secondary and post-secondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

(5) Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—

(A) a description of the process for public comment under Section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under Section 113(b)(3)(B) of Perkins V).

(B) an explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and

(C) a description of how the State determined levels of performance set by the eligible agency align with the levels, goals, and objectives of other Federal and State laws (Section 122(d)(10) of Perkins V).

(6) As part of the procedures for determining the State determined levels of performance, describe the process that will be used to establish a baseline for these levels.

(7) Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to Section 113(b)(3)(B) of Perkins V. (Sections 113(b)(3)(B)(iii) of Perkins V). As part of the written response, include a description of any changes made to the State determined performance levels due to stakeholder feedback.

(8) Describe how the eligible agency will address disparities or gaps in performance, as described in Section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years; if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

As part of the written response and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP), 26 the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. To address this requirement, the eligible agency is not required to submit a new State plan prior to the third program year.