

# 2020 Puerto Rico Unified State Plan

Workforce Innovation and Opportunity Act (WIOA)

Puerto Rico Department of Economic  
Development and Commerce

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GOBIERNO DE PUERTO RICO

Departamento de Desarrollo  
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## LIST OF ABBREVIATIONS

<u>ACS</u>	American Community Survey of the US Census Bureau
<u>BLS</u>	Bureau of Labor Statistics of the USDOL
<u>ETA</u>	Employment and Training Administration of the USDOL
<u>HHS</u>	US Department of Health and Human Services
<u>HUD</u>	US Department of Housing and Urban Development
<u>ODEP</u>	Office of Disability Employment Policy of the USDOL
<u>PRAFC</u>	Puerto Rico Administration for Families and Children
<u>PRASDE</u>	Puerto Rico Administration for the Socio-economic Development of Families
<u>PRDCR</u>	Puerto Rico Department of Corrections and Rehabilitation
<u>PRDEDC</u>	Puerto Rico Department of Economic Development and Commerce
<u>PRDH</u>	Puerto Rico Department of Health
<u>PRDE</u>	Puerto Rico Department of Education
<u>PRDOF</u>	Puerto Rico Department of Family
<u>PRDOH</u>	Puerto Rico Department of Housing
<u>PRDOLHR</u>	Puerto Rico Department of Labor and Human Resources
<u>PRDOS</u>	Puerto Rico Department of State
<u>PREC</u>	Puerto Rico Education Council
<u>PRIDCO</u>	Puerto Rico Industrial Development Company
<u>PRPB</u>	Puerto Rico Planning Board
<u>PRVRA</u>	Puerto Rico Vocational Rehabilitation Administration
<u>SCDD</u>	State Council on Developmental Disabilities
<u>SCIL</u>	State Council for Independent Living
<u>SRC</u>	State Rehabilitation Council
<u>UPR</u>	University of Puerto Rico
<u>USDOE</u>	US Department of Education
<u>USDOL</u>	US Department of Labor
<u>WDP</u>	Workforce Development Program of the PRDEDC

## I. 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 will be submitting a Unified State Plan. This plan includes the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program.

## II. STRATEGIC ELEMENTS

### (A) ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

#### 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. This must include –

##### i. Puerto Rico Economic Overview

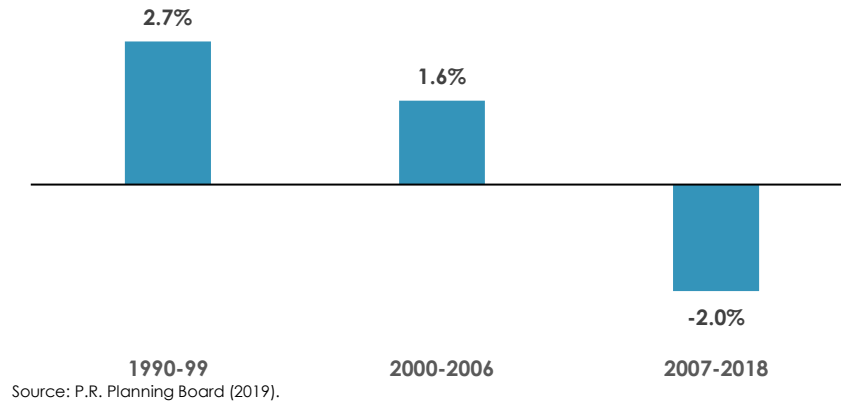
The evolution of the Economy of Puerto Rico in the Past 50 Years shows that P.R. moved from an agrarian economy in the 1960's, with the production of sugar cane and tobacco, to an industrial economy targeting petrochemical, electronics, needle and textiles manufacturing, in the period from 1970's until 2000.

The 21 century and the globalization launched the economy transformation to advanced manufacturing, service and knowledge economics, in industries like advance pharmaceuticals, medical devices, biotechnology, food, export services, etc. Beyond the 2000's the PR economy are moving to the aerospace industry.

Real GNP growth in Puerto Rico has experienced long-term stagnation from fiscal 1970 onwards, with the average annual growth in real GNP per decade since 1950 becoming progressively smaller for almost the entirety of the 1950-2018 period. Between the onset of the actual contraction in 2006 and 2018, the economy has contracted by 24.1%. Fiscal

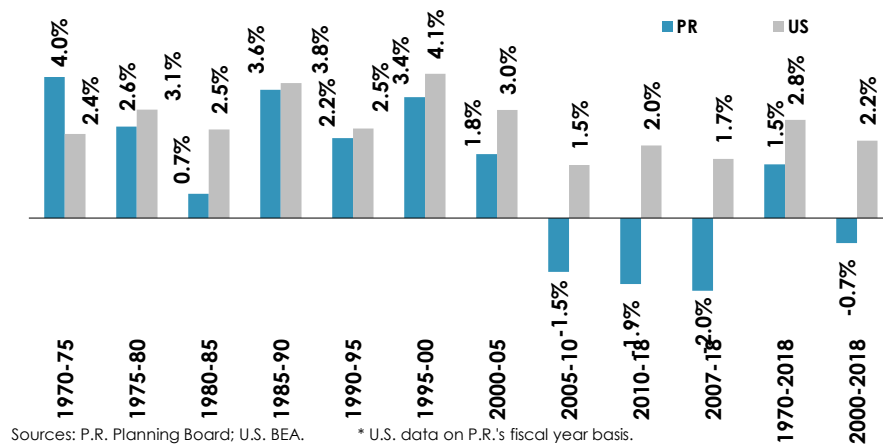
year 2018 real GNP contracted at -4.7%, mostly reflecting the impact of Hurricane María.

**Graph 1. Real GNP Growth: Averages (Fiscal Years)**



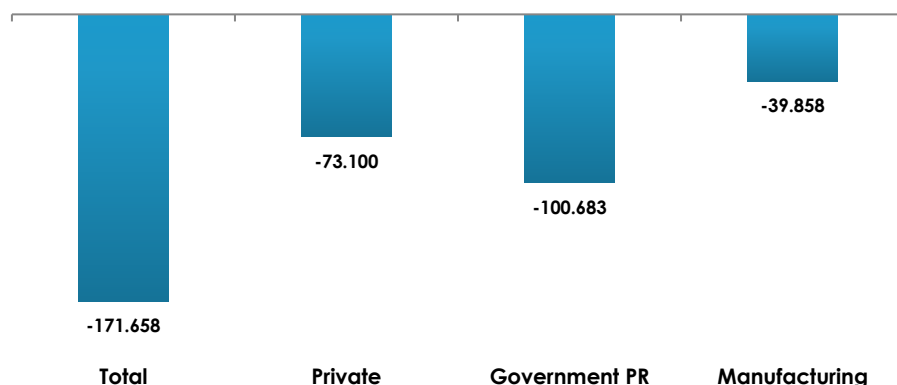
Moreover, the growth gap between the local economy and that of the mainland has widened considerably since 2000. The performance of the U.S. economy does have an impact on our economy, but the impact has weakened. During the second half of the 80s, P.R.'s real GNP growth averaged 3.6%, while in the case of the US it was 3.8%. Since 2007 until fiscal 2018 it declined an average of -2.0%, while the US economy expanded at an average annual rate of 1.7%.

**Graph 2. Average Annual Growth of Real GNP: Puerto Rico and U.S., 1970 to 2018\***



In 2006, Congress ended special tax breaks that historically aided the Puerto Rican economy. The island's job market has been ailing ever since. While the mainland U.S. added millions of jobs following the Great Recession, Puerto Rico never got back on its feet. Between the onset of the current contraction in 2007 and 2019, the economy has lost 171,658 salaried jobs (net), most of them public jobs, while over half of those lost in the private sector were in manufacturing.

Graph 3. Net Losses in Nonfarm Employment, 2007 - 2019 (Seasonally Adjusted)



Source: U.S. BLS (2020). Establishment Survey.

### Outlook for the fiscal and economic crisis

- In the past decade more than 300,000 people have left Puerto Rico. The impact of Hurricanes Irma and María accelerated this trend with an additional 600,000 people or 19% decline expected by FY22.
- Student population has declined by over 40% since 2000 with an additional 16% decline expected by FY22.
- About 43% of Puerto Rico residents live in poverty, which is the highest poverty rate of any U.S. state (Mississippi is the next highest at 19.7%). Puerto Rico's 8.2% unemployment rate (In 2019) is almost three times the national level.
- Concerns about quality of life, poor delivery of public services and high unemployment have led to a historic population exodus.
- Puerto Rico is treated unequally under key federal programs such as Medicaid as compared to states. For example, the Census Bureau has reported that Oregon, a relatively prosperous state with a population similar in size to Puerto Rico, received over \$29bn from the Federal Government, whereas Puerto Rico received \$19bn for the same year (GAO Report United States March 2014: Information on How Statehood Would Potentially Affect Selected Federal Programs and Revenue Source).
- Periods of fiscal irresponsibility and lack of economic planning and transparency also contributed to Puerto Rico's financial crisis
- Overestimation of economic growth projections resulted in massive deficits that were covered with one-time measures and debt financing
- Frequent policy changes and lack of economic planning led to economic decline.

- The Economic Activity Index remained on the negative side, excepting 2012, until 2017. The recuperation afterwards reflects the recuperation and investment undertaken as a result of Hurricane María.
- Unchecked fiscal deficits between 2001 and 2008 led to a recurrent practice of deficit financing, resulting in a 131% growth in public debt during the period.
- An increase in expenditures and public debt led to a consistent decline in Puerto Rico's credit ratings, except for the period between 2009 and 2012. (Puerto Rico Credit Rating FY00 –FY16: *S&P Rating on General Obligation Bonds*).
- Lenders enabled the island's debt binge - For years, bond holders extended credit to Puerto Rico, capitalizing on federal, state and municipal tax advantages. But the lending continued well into the 2010s, when the island was careening toward economic chaos. Like a subprime borrowing that can't afford to pay for a huge mortgage, Puerto Rico was broke — but the credit was provided anyway. The additional debt compounded the island's crisis.

#### Basic Economic Facts:

- **Privileged geographical location:** Easy access to U.S., Latin America and Europe.
- **Population:** 3.2 million (as of July 2018)
- **Languages:** Spanish & English
- **Direct flights to major cities**
- Puerto Rico residents and businesses are subject to the legal protection of both the U.S. and the Puerto Rico Constitutions.
- **GNP (2018):** \$68.1.1billion
- **GDP (2018):** \$101.1 billion
- **GNP PER CAPITA (2018):** \$20,874
- **EXPORTS VALUE (2018):** \$60.6 billion
- **IMPORTS VALUE (2018):** \$46.5 billion

Table 1. Puerto Rico Economy World Rating

	Rating
Ease of Doing Business	55
Starting a Business	51
Dealing with Construction Permits	131
Getting Electricity	65
Getting Credit	7

Paying Taxes	135
Trading across Borders	62

Source: The World Bank Group, Economy Rankings 2017

## Socioeconomic Conditions

The median household income is the lowest in the US, equivalent to a half of the lowest in the nation, and three time lower than the US Median. In 2018, the U.S. Median Household Income (\$mm's) was \$57,652, meanwhile for PR was \$20,166, a difference of -65% (United States Census Bureau, 2020).

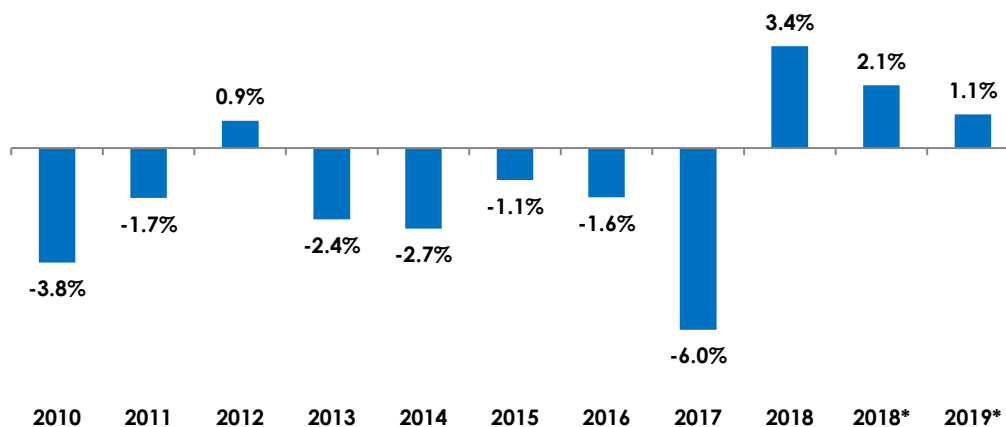
Table 2. Socioeconomics Welfare Conditions

Population	PR			USA		
	2010	2015	2017	2010	2015	2017
CHILDREN LIVING IN POVERTY	56.0%	58.0%	<b>57.3%</b>	22.0%	21.0%	<b>20.3%</b>
CHILDREN WITH PARENTS WITHOUT JOB SECURITY	54.0%	57.0%	<b>56.0%</b>	33.0%	29.0%	<b>27.0%</b>
CHILDREN LIVING IN HOUSES WITH HIGH COST OF HOUSING	32.0%	31.0%	<b>29.0%</b>	41.0%	33.0%	<b>31.0%</b>
ADOLESCENTS WHO DO NOT ATTEND SCHOOL OR WORK	18.0%	11.0%	<b>13.0%</b>	9.0%	7.0%	<b>7.0%</b>

Source: U.S. Census Bureau (2019). American Community Survey 5-Year Estimates; Kids Count Data Center (2020). Data.

Since 2000 the economic activity index reflected a downward trend, reaching a decrease of -6.0% in 2017, a reflection of the impacts of the hurricanes in September. Afterwards, though, the EIA has moved up as a result of the reconstruction activities post-María.

Graph 4. Annual Average Growth of FAFAA's Economic Activity Index (Calendar year)



Source: Economic Development Bank. \* January-November.

Total public debt in circulation increased from \$24.2 billion in fiscal year 2000, to \$69.0 billion in fiscal year 2017. Overestimation of economic growth projections resulted in massive deficits that were covered with one-time measures and debt financing.

Table 3. Total Public Debt in Circulation of Puerto Rico (\$Mm)

FY	GO's	Public Corporations	Municipal	Extra Constitutional	SUT (COFINA)	Total Central Government*	Gross Public Debt**	Other Debt***	Total	Annual Growth	Total/GNP	GPD/GNP
2000	\$5,348.9	\$13,431.6	\$1,464.4	\$3,576.8		\$8,925.7	\$23,821.7	\$367.1	\$24,188.8		58.4%	57.5%
2001	\$5,573.4	\$13,699.1	\$1,632.2	\$4,310.1		\$9,883.5	\$25,214.8	\$1,944.8	\$27,159.6	12.3%	60.2%	55.9%
2002	\$5,853.8	\$15,124.1	\$1,795.8	\$5,192.7		\$11,046.5	\$27,966.4	\$2,046.2	\$30,012.6	10.5%	65.2%	60.8%
2003	\$6,222.1	\$15,889.8	\$1,955.1	\$5,640.0		\$11,862.1	\$29,707.0	\$2,817.5	\$32,524.5	8.4%	67.1%	61.3%
2004	\$6,878.7	\$18,040.6	\$2,046.0	\$6,977.3		\$13,856.0	\$33,942.6	\$3,491.0	\$37,433.6	15.1%	72.2%	65.5%
2005	\$7,307.1	\$19,234.1	\$2,181.3	\$7,980.5		\$15,287.6	\$36,703.0	\$3,565.3	\$40,268.3	7.6%	73.4%	66.9%
2006	\$7,276.3	\$20,449.5	\$2,330.3	\$9,557.5		\$16,833.8	\$39,613.6	\$3,522.7	\$43,136.3	7.1%	74.6%	68.5%
2007	\$8,167.2	\$24,159.4	\$2,463.0	\$5,203.5	\$2,825.2	\$16,195.9	\$42,818.3	\$3,365.0	\$46,183.3	7.1%	76.2%	70.6%
2008	\$8,758.7	\$26,342.4	\$2,819.4	\$2,683.1	\$6,328.6	\$17,770.4	\$46,932.2	\$6,460.7	\$53,392.9	15.6%	85.2%	74.8%
2009	\$9,006.4	\$26,640.8	\$2,997.3	\$2,759.6	\$11,575.9	\$23,341.9	\$52,980.0	\$5,434.9	\$58,414.9	9.4%	91.8%	83.3%
2010	\$9,511.2	\$27,287.9	\$3,231.4	\$2,574.9	\$14,217.6	\$26,303.7	\$56,823.0	\$5,383.2	\$62,206.2	6.5%	96.8%	88.4%
2011	\$9,681.6	\$28,118.1	\$3,537.0	\$3,070.0	\$14,535.4	\$27,287.0	\$58,942.1	\$5,337.1	\$64,279.2	3.3%	97.8%	89.7%
2012	\$10,945.0	\$30,801.0	\$3,872.0	\$3,160.0	\$15,982.0	\$30,087.0	\$64,760.0	5,188.00	\$69,948.0	8.8%	102.7%	95.1%
2013	\$10,599.0	\$31,208.8	\$3,882.0	\$4,043.5	\$15,223.8	\$29,866.3	\$64,957.0	5,086.01	\$70,043.0	0.1%	101.6%	94.2%
2014	\$13,400.7	\$30,311.8	\$4,193.0	\$3,943.7	\$15,224.0	\$32,568.4	\$67,073.2	\$4,993.8	\$72,267.0	3.2%	105.0%	97.5%
2015	\$13,060.8	\$29,424.2	\$4,126.1	\$4,047.5	\$15,223.8	\$32,332.1	\$65,882.4	\$4,934.6	\$71,217.0	-1.5%	102.3%	94.7%
2016	\$12,663.6	\$27,641.2	\$3,732.7	\$4,609.7	\$15,174.2	\$32,447.5	\$63,821.4	\$4,684.6	\$68,906.0	-3.2%	98.1%	90.9%
2017	\$12,664.0	\$27,591.1	\$3,724.0	\$4,665.0	\$15,174.0	\$32,503.4	\$63,818.5	\$4,665.0	\$68,835.0	-0.1%	97.5%	90.4%
<b>CAGR</b>	5.2%	4.3%	5.6%	1.6%	18.3%	7.9%	6.0%	16.1%	6.3%			

Sources: Government Development Bank; OMB, Budget Requests, various years.

\* Consist of the GO's, SUT, and the Extra Constitutional.

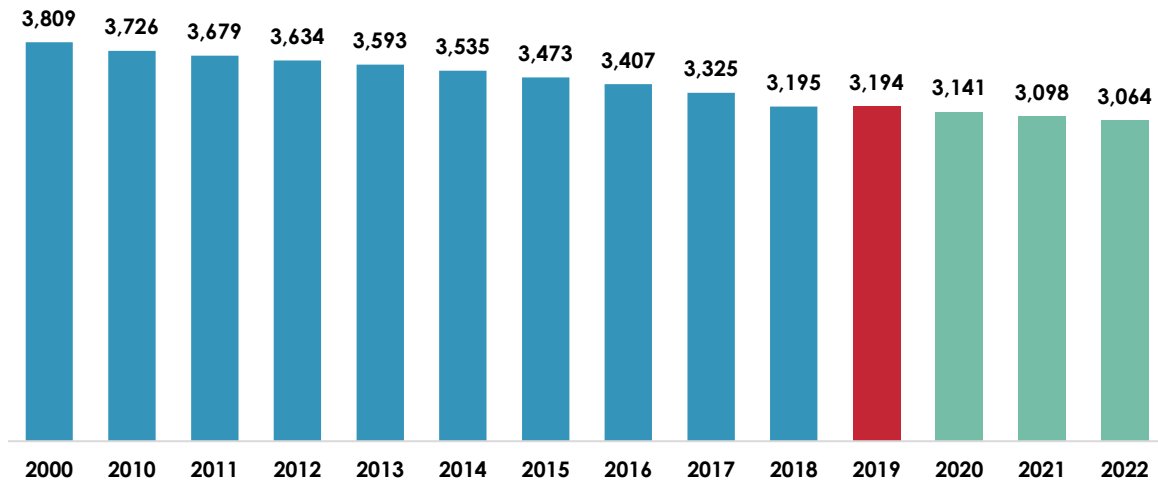
\*\* Total central government plus municipal.

\*\*\* Debt paid with federal funds from the Housing and Urban Development Department, and the funds received through the federal agreement with the tobacco companies.

## Population Decline

One important demographic trend that characterizes Puerto Rico's economy is the decline in population, in particular after 2010. Between 2010 and 2019 there has been a reduction of 532,000 persons. That trend is expected to continue, with a further decline to 3.1 inhabitants by 2022.

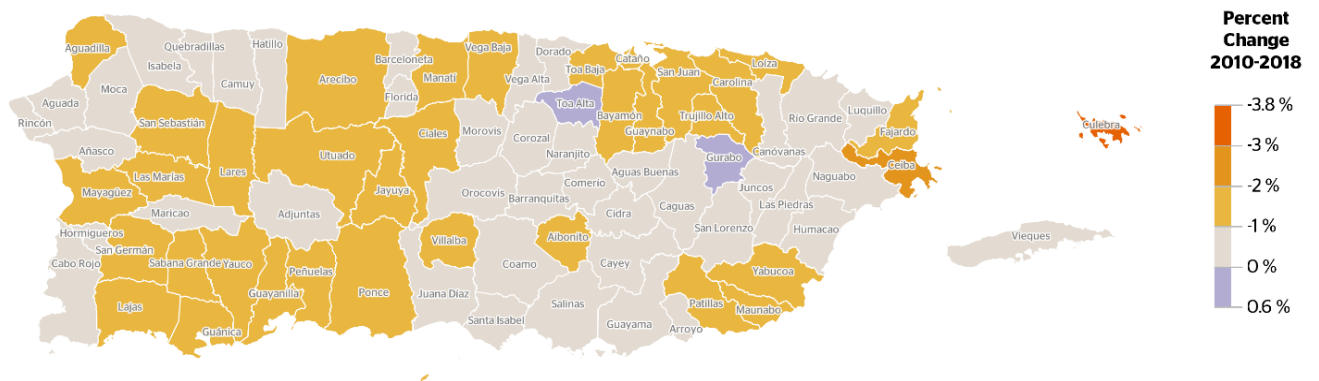
Graph 5. Population: Historical and Projected (Thousands) 2000-2022



Sources: U.S. Census Bureau (2019). *Population Estimates* (PEPANRES); Estudios Técnicos, Inc (2019).

One factor in that decline is emigration. Net migration has been increasing steadily since 2011. By 2018 net migration rose to 123,400 people, reflecting the impact of Hurricane María.

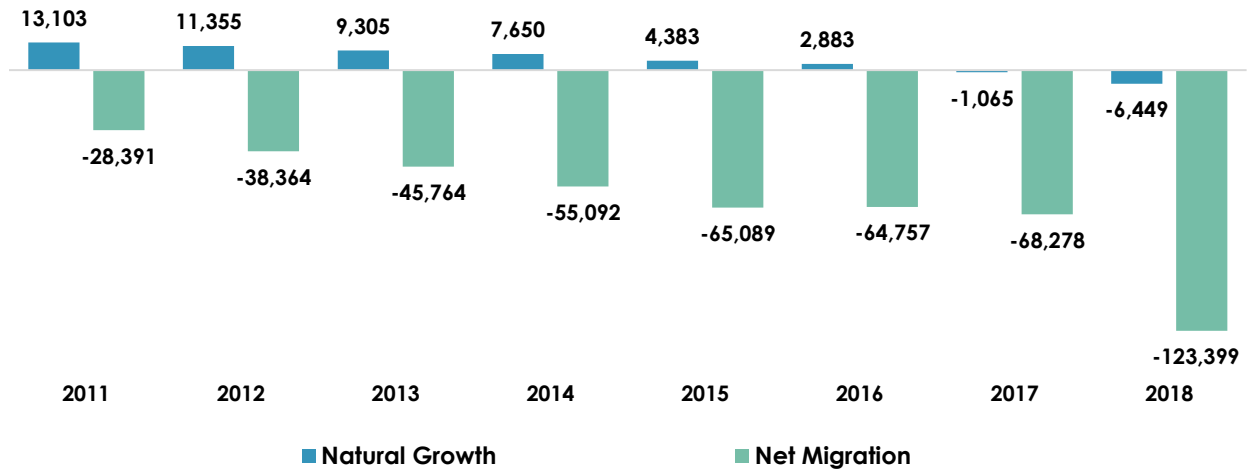
Figure 1. Population Change 2010-2018



Source: U.S. Census Bureau, 2014-2018 American Community Survey 5 Year Estimates



Graph 6. Puerto Rico Natural Growth & Net Migration (2011-2018)

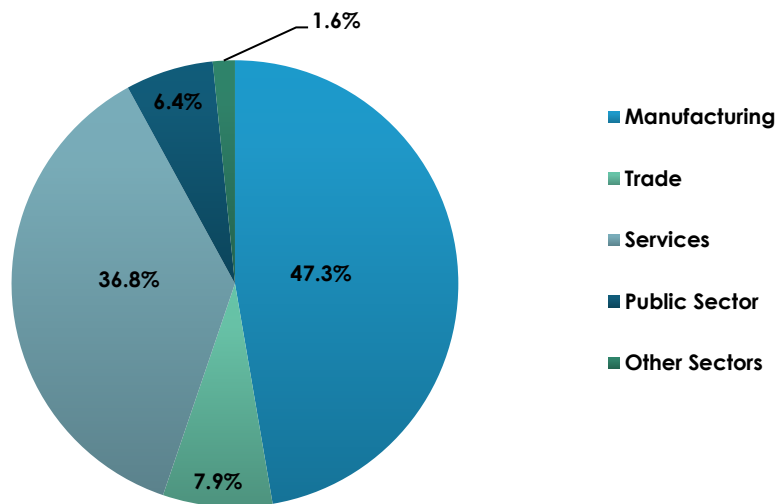


Source: U.S. Census Bureau (2019). *Population Estimates* [PEPTCOMP].

### Structure of Production: Gross Domestic Product (GDP)

Manufacturing represents almost half of the total value of economic production, but services do have also an important share. The pharmaceutical industry is still the key industry in manufacturing, with aerospace, computer and electronic increasing their economic impact among the manufacturing industry. The current manufacturing sector relies in high technology, medical device, chemical, and electronics.

Graph 7. Composition of GDP - Fiscal Year 2018



Source: PR Planning Board (2019). Statistical Appendix 2018. Table 9.

## **Transformation and Innovation in The Wake of Devastation**

After hurricanes Irma and María, thousands of people lost their jobs, schools were closed, government services and private enterprise could no longer operate effectively, landslides caused flooding hazards, and wastewater polluted marine environments. The Government of Puerto Rico views the recovery efforts as an opportunity to transform the Island by implementing solutions that are cost effective and forward looking, that harness innovative thinking and best practices, and revitalizes economic growth.

Recovery efforts are an opportunity to use recovery investments to help transform the Island by implementing solutions that are:

- cost-effective and forward-looking;
- harness innovative thinking and best practices from around the world; and
- contribute to greater economic development, revitalization, and growth as well as enhanced human capital.

Puerto Rico's recovery plan sets out a path to help guide recovery investments toward this broader transformational vision by:

- defining what recovery means for Puerto Rico;
- establishing principles for how the Government of Puerto Rico, nongovernmental, private, and nonprofit agencies should work together towards recovery;
- describing the phases, the recovery will progress through;
- identifying the most pressing recovery issues and the priority actions, as well as potential partners and resources to address each issue; and
- committing to measuring and reporting on the progress of the recovery.

### **The Central Recovery and Reconstruction Office of Puerto Rico**

The Government of Puerto Rico— through the Central Recovery and Reconstruction Office (CRRO), established by executive order in 2017 and now also known as the Central Office of Recovery, Reconstruction, and Resilience (COR3), is in charge of developing this recovery plan in response to the “Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018” (Public Law No. 115-123). COR3 plans to use third-party assistance to manage recovery funds and optimize the long-term reconstruction process.

### **Development of The Recovery Plan**

The plan was developed over the course of three dynamic and overlapping phases:

1. Identifying damage, needs, and priorities for recovery
2. Identifying potential courses of actions (and their related costs)
3. Aligning the plan objectives and courses of action and identifying funding sources.

## Fiscal transparency and strong Governance

Transparency is a key guiding principle of Puerto Rico's entire recovery process.

The Central Recovery and Reconstruction Office of Puerto Rico, as a division of the P3 Authority, have the authority to centralize and oversight of the recovery and reconstruction of Puerto Rico. It will ensure that the Government of Puerto Rico can implement reconstruction efforts with efficiency, effectiveness, and transparency.

The COR3's responsibilities are to:

- **Monitor** contracting for compliance and effectiveness purposes.
- **Implement and enforce** checks and balances for procurement and approval of contracts and payments.
- **Deploy** a proven grant-management software and provide external visibility via frequent status updates to its public website.
- **Coordinate and channel** all efforts and activities of the Government related to recovery efforts.
- **Process, finance, and execute** works and infrastructure projects related to recovery efforts.

## PROMESA ACT

Since July 1<sup>st</sup>, 2016, Puerto Rico is under federal legislation geared to the goal of restructuring Puerto Rico's public debt, and stabilizing government spending and long-term growth.

The Puerto Rico Oversight, Management, and Economic Stability Act, Pub. Law 114-187 ("PROMESA" or the "Act"), was enacted into law on June 30, 2016. The Senate had passed PROMESA on June 29, 2016, and President Obama signed the Act into law on June 30, 2016. PROMESA is a federal legislative enactment. PROMESA includes a variety of provisions applicable to Puerto Rico, its instrumentalities and their liabilities and operations.

The Act established a seven-member Board, the members of which are designated by Congress and the President. The Oversight Board is provided with broad authority over Puerto Rico and instrumentalities of Puerto Rico, which the Oversight Board designates as "covered" instrumentalities. A key authority of the Board is that no budget can be submitted to the Legislature unless the Oversight Board has approved a fiscal plan, and the budget is consistent with the fiscal plan. The Oversight Board can submit its own budget if the governor's budget is not acceptable.

A critical component of PROMESA is the requirement that Puerto Rico and covered instrumentalities must develop and maintain a fiscal plan. The first fiscal plan was submitted by the Board on September 2016. The most recent one was approved in May

of last year. Also, in September the FOMB issued its Debt Adjustment Plan, as required under Title III of the Law, with the purpose of restricting the public debt and stabilizing debt repayment in the coming years.

ii. Existing Demand Industry Sectors and Occupations.

Provide an analysis of the industries and occupations for which there is existing demand.

**Industry sectors in general**

As shown in table below, the principal industrial sectors with the highest share of GDP output in FY 2018 were Manufacturing (47.3%), Real Estate and Rental (15.88%), Government (6.37%), Retail Trade (5.2%), and Finance and Insurance (4.47%). These top five sectors comprised almost 80% of Puerto Rico's 2018 GDP output.

**Table 4. Series of Income and Product, Total, and Per Capita: FY 2005, 2011, 2014, 2018**

	2005	2011	2014	2018
Total in current dollars (\$millions)				
Gross national product	54,861.9	65,720.7	68,797.5	68,048.7
Per capita	14,346.0	17,742.0	19,373.0	20,873.8
Gross domestic product	83,914.5	100,351.7	102,445.8	101,130.9
Per capita	21,943.0	27,092.0	28,745.0	31,021.7
Per Industrial Sector (sector as % of GDP, subsector as % of sector)				
Agriculture	0.6	0.79	0.85	0.78
Construction	2.5	1.3	1.10	0.85
Manufacturing	42.4	46.6	46.73	47.30
Wholesalers Trade	3.21	2.9	2.75	2.72
Retail Trade	5.57	4.77	4.91	5.20
Transportation and Warehousing	1.12	0.89	0.89	1.08
Information	2.32	2.6	2.58	2.73
Finance and Insurance	7.4	5.59	4.31	4.47
Real Estate and Rental	11.43	14.32	15.42	15.88
Professional, Scientific, Technical Services	2.08	1.54	1.79	2.25
Management	0.16	0.08	0.07	0.09

	<b>2005</b>	<b>2011</b>	<b>2014</b>	<b>2018</b>
Administrative Services and Support	1.75	1.68	1.78	1.91
Educational Services	0.97	0.68	0.68	0.57
Health Care and Social Services	3.48	3.38	3.63	3.72
Art, Entertainment and Recreation	0.3	0.09	0.14	0.14
Accommodation and Food Services	2.03	1.77	1.97	2.03
Other Services	0.48	0.38	0.42	0.40
Government	9.71	8.19	7.64	6.37
Commonwealth	86.28	81.59	80.32	76.52
Municipalities	13.72	18.41	19.68	23.48
Gross national product	7,314.7	6,431.7	6,343.9	5,726.5
Per capita	1,913	1,736	1,780	1,757
Gross domestic product	11,379.2	10,589.2	10,434.1	9,436.5
Per capita	2,976	2,859	2,928	2,895
Salaries and wages (\$millions)	25,393.1	25,268.5	25,188.5	23,850.8
Employment, total (thousands)	1,213	1,044	987	971
Productivity (\$)	9,381	10,143	10,572	9,718

Source: PRPB, Statistical Appendix 2014.

From FY 2005 to FY 2018, the top nonfarm industrial sectors that were able to expand their share of GDP were Manufacturing, Real Estate and Rental, Information, and Health Care and Social Services. Moreover, the sectors that experienced a drop in their share of GDP were Government, Finance and Insurance, and Construction.

When focusing on the changes in GDP output among major industrial sectors between 2014 and 2018, additional movers emerged with Management of companies and enterprises increasing by 36.3%, Professional, Scientific and Technical services by 23.9%, and Transportation and Warehousing by 19.9%. On the other hand, Construction, Government, and Educational services have diminished the most by -23.6%, -17.7%, and -17.6%, respectively.

The table below depicts the major industrial sectors with the highest estimated jobs for the first two quarters of 2019. Out of the 39 sectors and subsectors, 23 (59%) had an uptick in employment and 16 (41%) experienced a decrease between 2017-2019.

The largest employment sectors were Retail Trade (14.5%), Government (13.9%), Health Care and Social Services (10.5%), and Educational Services (9.7%). Together, they made

up almost half (48.6%) of employment in 2019. The sectors that declined the most during this period were Agriculture (-21.9%), Educational Services (-10.5%), Government (-8.5%), Utilities (-7.6%), and Information (-6.8%).

**Table 5. Employment Estimates by Major Industry, Q1-Q2 2019**

<b>Industrial Sector</b>	<b>Total</b>	<b>As % of total</b>	<b>Change 2017-2019</b>
Agriculture	9,835	1.1%	-21.9%
Mining	519	0.1%	3.9%
Utilities	8,147	0.9%	-7.6%
Construction	26,462	3.0%	28.0%
Manufacturing	74,267	8.5%	2.6%
Food	11,680	1.3%	-0.7%
Beverage and Tobacco Product	2,285	0.3%	-5.6%
Apparel	6,725	0.8%	25.2%
Leather and Allied Product	1,022	0.1%	-4.8%
Wood Product	397	0.0%	13.5%
Paper	926	0.1%	-5.2%
Printing and Related Support Activities	1,556	0.2%	-5.4%
Petroleum and Coal Products	563	0.1%	29.4%
Chemical	16,309	1.9%	-2.5%
Plastics and Rubber Products	1,667	0.2%	3.7%
Nonmetallic Mineral Product	1,447	0.2%	4.6%
Primary Metal	336	0.0%	34.4%
Fabricated Metal Product	3,733	0.4%	25.5%
Machinery	2,138	0.2%	4.7%
Computer and Electronic Product	5,580	0.6%	6.3%
Electrical Equipment, Appliance, and Component	3,970	0.5%	-3.1%
Transportation Equipment	1,691	0.2%	14.3%
Furniture and Related Product	1,032	0.1%	1.8%
Miscellaneous	11,209	1.3%	0.2%
Wholesalers Trade	30,025	3.4%	2.1%

<b>Industrial Sector</b>	<b>Total</b>	<b>As % of total</b>	<b>Change 2017-2019</b>
Retail Trade	125,864	14.5%	-1.9%
Transportation and Warehousing	21,012	2.4%	8.1%
Information	16,371	1.9%	-6.8%
Finance and Insurance	29,962	3.4%	2.7%
Real Estate and Rental	14,117	1.6%	2.6%
Professional, Scientific, and Technical Services	32,837	3.8%	6.6%
Management of Companies and Enterprises	14,917	1.7%	9.9%
Administrative Services and Support and Waste Management and Remediation	75,121	8.6%	4.6%
Educational Services	84,887	9.7%	-10.5%
Health Care and Social Services	91,511	10.5%	-0.4%
Art, Entertainment and Recreation	4,342	0.5%	-2.6%
Accommodation and Food Services	74,257	8.5%	-2.8%
Other Services	15,047	1.7%	1.8%
<b>Government</b>	120,913	13.9%	-8.5%
<b>Total</b>	<b>870,729</b>	<b>100.0%</b>	<b>-1.4%</b>

Source: PRDOLHR, OES Estimates, 2017, 2019.

## Occupations

In 2018, the occupations with the largest net gain in employment between 2014 and 2018 were Assemblers and Fabricators, Combined Food Preparation and Serving Workers, Business and Financial Operations, Middle School Teachers, Cooks, and Teacher Assistants, among others.

Moreover, the top hiring occupations in 2018 were Business and Financial Operations (42,300), Security Guards (28,290), Registered Nurses (19,230), Stock Clerks and Order Fillers (17,790), and Combined Food Preparation and Serving Workers (13,720). These positions combined had an average hourly wage of \$12.60 in 2018.

Table 6. Occupations with the largest increase in employment, 2014-2018

Occupations	Est. 2014	Est 2018	Net gain	% gain	MHW 2014 (\$)	MHW 2018 (\$)
Assemblers and Fabricators, All Other, Including Team Assemblers	4,030	9,140	5,110	126.8%	\$8.50	\$10.02
Combined Food Preparation and Serving Workers, Including Fast Food	10,710	13,720	3,010	28.1%	\$8.16	\$8.58
Business and Financial Operations Occupations	39,510	42,300	2,790	7.1%	\$18.32	\$19.10
Middle School Teachers, Except Special and Career/Technical Education	710	3,500	2,790	393.0%	N/A	N/A
Cooks, Institution and Cafeteria	4,310	7,050	2,740	63.6%	\$8.53	\$10.96
Teacher Assistants	6,610	9,230	2,620	39.6%	N/A	N/A
Computer and Mathematical Occupations	9,170	11,070	1,900	20.7%	\$20.61	\$20.90
Medical Secretaries	4,360	6,160	1,800	41.3%	\$10.56	\$10.57
Maintenance and Repair Workers, General	5,570	7,100	1,530	27.5%	\$10.86	\$10.20
Registered Nurses	17,740	19,230	1,490	8.4%	\$16.22	\$16.80
Security Guards	27,050	28,290	1,240	4.6%	\$8.34	\$8.85
Stock Clerks and Order Fillers	16,630	17,790	1,160	7.0%	\$9.06	\$9.65

Source: BLS (2019). OES.

Table below shows the principal occupations that are projected to have the largest expansions (in absolute terms) between 2016 and 2026, according to Puerto Rico's Department of Labor and Human Resources (PRDLHR) report on skills and occupations in high demand. The top five occupations that are estimated to have the highest numeric change between 2016 and 2026 are Combined Food Preparation and Serving Workers, Security Guards, Janitors and Cleaners, Pharmacy Technicians, and Waiters and Waitresses.

Of the top 30 occupations, 20 (66.7%) had San Juan as the local area with the largest employment increase. Another 5 (16.7%) were in the Caguas-Guayama region.

Table II-4 below highlights the occupations with the largest decreases in employment (in absolute terms) between 2014 and 2018. The top occupations that fell the most were Office and Administrative Support, Sales and Related, Retail Salespersons, Production, and Food Preparation and Serving Related occupations.



Within these occupations, the ones with the highest employments were Office and Administrative Support (153,920), Sales and Related (98,120), Food Preparation and Serving Related (64,890), Production (55,240), and Transportation and Material Moving Occupations (42,780).

**Table 7. Occupations with the largest projected increase in employment, 2016-2026**

#	SOC Code	Occupation	Employment 2016	Employment 2026	Numeric Change	Percent Change	Local area with the largest increase	Local Area increase
3	35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	14,941	18,451	3,510	23.5%	San Juan	419
17	33-9032	Security Guards	24,407	26,309	1,902	7.8%	San Juan	872
26	37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	31,726	33,402	1,676	5.3%	San Juan	215
2	29-2052	Pharmacy Technicians	5,277	6,555	1,278	24.2%	San Juan	218
12	35-3031	Waiters and Waitresses	11,838	12,955	1,117	9.4%	San Juan	569
5	35-2014	Cooks, Restaurant	6,265	7,204	939	15.0%	San Juan	375
4	43-6013	Medical Secretaries	4,204	4,993	789	18.8%	San Juan	145
1	31-1011	Home Health Aides	2,086	2,612	526	25.2%	San Juan	130
7	41-3021	Insurance Sales Agents	3,314	3,808	494	14.9%	San Juan	162
9	11-9051	Food Service Managers	4,092	4,570	478	11.7%	San Juan	60
21	39-9021	Personal Care Aides	6,112	6,537	425	7.0%	San Juan	72
10	35-3022	Counter Attendants, Cafeteria, Food Concession, and Coffee Shop	3,593	3,972	379	10.6%	Ponce	19
11	11-3031	Financial Managers	3,899	4,268	369	9.5%	San Juan	166
6	31-9091	Dental Assistants	2,311	2,657	346	15.0%	Caguas-Guayama	91
14	43-3021	Billing and Posting Clerks	3,961	4,288	327	8.3%	San Juan	147
27	11-1021	General and Operations Managers	6,124	6,444	320	5.2%	San Juan	115

#	SOC Code	Occupation	Employment 2016	Employment 2026	Numeric Change	Percent Change	Local area with the largest increase	Local Area increase
13	51-9199	Production Workers, All Other	3,204	3,476	272	8.5%	Caguas-Guayama	105
8	29-1051	Pharmacists	2,177	2,447	270	12.4%	San Juan	38
18	41-9091	Door-to-Door Sales Workers, News and Street Vendors, and Related Workers	3,015	3,249	234	7.8%	NA	NA
24	41-1012	First-Line Supervisors of Non-Retail Sales Workers	3,987	4,215	228	5.7%	San Juan	36
15	29-2011	Medical and Clinical Laboratory Technologists	2,616	2,831	215	8.2%	Caguas-Guayama	28
16	53-7081	Refuse and Recyclable Material Collectors	2,110	2,281	171	8.1%	Norte Central - Arecibo	38
19	35-9021	Dishwashers	2,273	2,444	171	7.5%	San Juan	80
30	41-3099	Sales Representatives, Services, All Other	3,696	3,854	158	4.3%	San Juan	103
20	51-3021	Butchers and Meat Cutters	2,059	2,213	154	7.5%	Caguas-Guayama	30
25	11-3011	Administrative Services Managers	2,719	2,872	153	5.6%	Guaynabo-Toa Baja	24
29	17-2112	Industrial Engineers	2,992	3,132	140	4.7%	Caguas-Guayama	27
22	11-2022	Sales Managers	2,039	2,163	124	6.1%	San Juan	53
23	37-1011	First-Line Supervisors of Housekeeping and Janitorial Workers	2,078	2,202	124	6.0%	Guaynabo-Toa Baja	7
28	39-5012	Hairdressers, Hairstylists, and Cosmetologists	2,358	2,478	120	5.1%	San Juan	13

Source: PRDOLHR, Long Term Projections by Occupation 2016-2026.

Note: Only includes occupations with 2,000 or more jobs in 2016. For confidentiality reasons some local area data was not disclosed.

On the other hand, the occupations that have had the largest net losses between 2014 and 2018 are Office and Administrative Support Occupations, Sales and Related, and

Retail Salespersons with a combined total of 36,040 jobs. Furthermore, the occupations that have contracted the most during this period were Food preparation workers (-34%), First-Line Supervisors of Food Preparation and Serving Workers (-28.9%), and Laborers and Freight, Stock, and Material Movers, Hand (-24.5%).

**Table 8. Occupations with the largest decrease in employment, 2014 and 2018**

<b>Occupations</b>	<b>Est. 2014</b>	<b>Est 2018</b>	<b>Net loss</b>	<b>% loss</b>	<b>MHW 2014 (\$)</b>	<b>MHW 2018 (\$)</b>
Office and Administrative Support Occupations	166,720	153,920	-12,800	-7.7%	\$11.33	\$12.04
Sales and Related Occupations	110,610	98,120	-12,490	-11.3%	\$10.60	\$11.10
Retail Salespersons	42,840	32,090	-10,750	-25.1%	\$9.01	\$9.33
Production Occupations	63,340	55,240	-8,100	-12.8%	\$10.93	\$11.65
Food Preparation and Serving Related Occupations	72,640	64,890	-7,750	-10.7%	\$8.67	\$9.13
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	24,540	19,090	-5,450	-22.2%	\$10.03	\$10.79
Transportation and Material Moving Occupations	48,200	42,780	-5,420	-11.2%	\$10.43	\$10.99
Building and Grounds Cleaning and Maintenance Occupations	43,580	39,520	-4,060	-9.3%	\$8.93	\$9.76
Food Preparation Workers	11,890	7,850	-4,040	-34.0%	\$8.83	\$8.83
Construction and Extraction Occupations	31,130	27,630	-3,500	-11.2%	\$10.21	\$10.59
Laborers and Freight, Stock, and Material Movers, Hand-	12,470	9,300	-3,170	-25.4%	\$10.55	\$12.02
Personal Care and Service Occupations	15,980	13,500	-2,480	-15.5%	\$8.97	\$9.49
Police and Sheriff's Patrol Officers	16,320	13,860	-2,460	-15.1%	\$8.76	\$15.23
First-Line Supervisors of Food Preparation and Serving Workers	7,750	5,510	-2,240	-28.9%	\$10.62	\$10.64

Source: BLS (2019). OES.

According to the forecasts done by PRDLHR from 2016-2026, the occupations that are estimated to reduce substantially are Office Clerks, Executive Secretaries and Executive Administrative Assistants, Secretaries and Administrative Assistants, Police and Sheriff's Patrol Officers, and Sewing Machine Operators.

Most of the occupations that are estimated to decrease are in San Juan (70%) while 13% are in the South and 10% are in the Caguas-Guayama region.

Table 9. Occupations with the largest projected decrease in employment, 2016-2026

#	SOC Code	Occupation	Employment 2016	Employment 2026	Numeric Change	Percent Change	Local area with the largest decrease	Local Area Decrease
1	43-9022	Word Processors and Typists	3,587	2,197	-1,390	-38.8%	San Juan	-435
2	43-6012	Legal Secretaries	3,618	2,536	-1,082	-29.9%	San Juan	-499
3	43-6011	Executive Secretaries and Executive Administrative Assistants	9,585	6,866	-2,719	-28.4%	San Juan	-1,245
4	33-3012	Correctional Officers and Jailers	4,644	3,406	-1,238	-26.7%	Caguas-Guayama	-91
5	43-9021	Data Entry Keyers	2,583	1,911	-672	-26.0%	San Juan	-277
6	51-6031	Sewing Machine Operators	7,326	5,551	-1,775	-24.2%	Suroeste	-631
7	51-2092	Team Assemblers	5,916	4,567	-1,349	-22.8%	Manatí-Dorado	-146
8	51-9061	Inspectors, Testers, Sorters, Samplers, and Weighers	3,564	2,971	-593	-16.6%	Sureste	-98
9	33-3051	Police and Sheriff's Patrol Officers	15,438	13,171	-2,267	-14.7%	San Juan	-1,024
10	33-1012	First-Line Supervisors of Police and Detectives	3,087	2,651	-436	-14.1%	San Juan	-196
11	13-1023	Purchasing Agents, Except Wholesale, Retail, and Farm Products	2,040	1,755	-285	-14.0%	San Juan	-89
12	53-7064	Packers and Packagers, Hand	3,477	3,004	-473	-13.6%	Caguas-Guayama	-101
13	43-3071	Tellers	3,183	2,773	-410	-12.9%	San Juan	-71
14	43-9061	Office Clerks, General	23,689	20,678	-3,011	-12.7%	San Juan	-1,010
15	21-1093	Social and Human Service Assistants	5,046	4,466	-580	-11.5%	San Juan	-265

#	SOC Code	Occupation	Employment 2016	Employment 2026	Numeric Change	Percent Change	Local area with the largest decrease	Local Area Decrease
16	43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	23,586	20,984	-2,602	-11.0%	San Juan	-946
17	43-3011	Bill and Account Collectors	2,702	2,409	-293	-10.8%	San Juan	-114
18	25-1194	Vocational Education Teachers, Postsecondary	2,039	1,830	-209	-10.3%	Bayamón-Comerio	-303
19	47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	3,842	3,460	-382	-9.9%	San Juan	-120
20	47-2031	Carpenters	4,858	4,391	-467	-9.6%	San Juan	-110
21	25-2011	Preschool Teachers, Except Special Education	2,932	2,657	-275	-9.4%	San Juan	-80
22	51-9023	Mixing and Blending Machine Setters, Operators, and Tenders	2,293	2,088	-205	-8.9%	Sureste	-51
23	43-3031	Bookkeeping, Accounting, and Auditing Clerks	8,695	7,945	-750	-8.6%	San Juan	-281
24	47-4051	Highway Maintenance Workers	5,772	5,299	-473	-8.2%	Caguas-Guayama	-72
25	39-9011	Childcare Workers	3,279	3,023	-256	-7.8%	San Juan	-82
26	21-1021	Child, Family, and School Social Workers	3,741	3,453	-288	-7.7%	San Juan	-194
27	29-2061	Licensed Practical and Licensed Vocational Nurses	4,504	4,160	-344	-7.6%	San Juan	-44
28	51-1011	First-Line Supervisors of Production and Operating Workers	4,405	4,075	-330	-7.5%	Sureste	-34

#	SOC Code	Occupation	Employment 2016	Employment 2026	Numeric Change	Percent Change	Local area with the largest decrease	Local Area Decrease
29	47-2061	Construction Laborers	10,933	10,162	-771	-7.1%	San Juan	-132
30	25-9041	Teacher Assistants	7,289	6,796	-493	-6.8%	San Juan	-455

Source: PRDOLHR, Long Term Projections by Occupation 2016-2026.

Note: Only includes occupations with 2,000 or more jobs in 2016. For confidentiality reasons some local area data was not disclosed.

## ii. Emerging Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which demand is emerging.

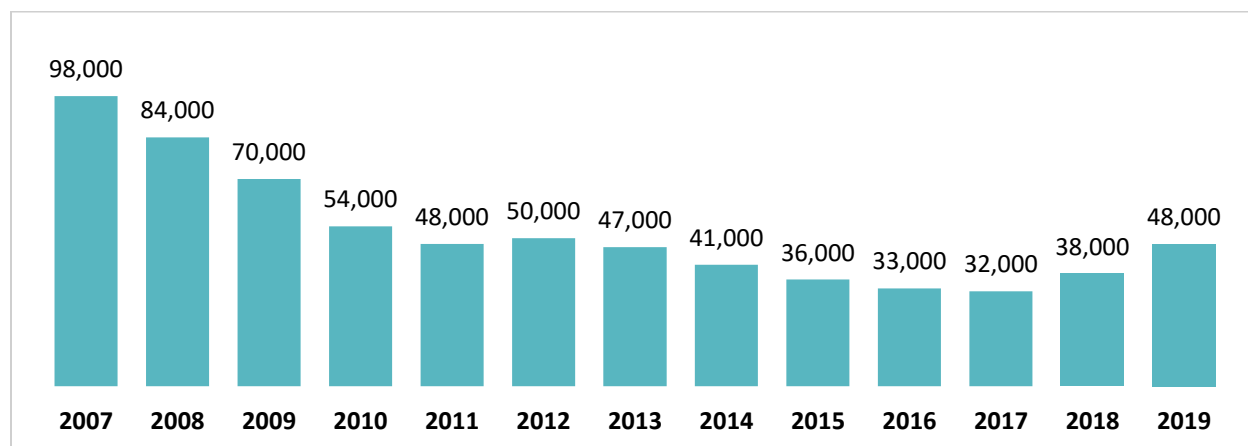
### Industry Sectors in General

#### Construction Sector Insights

Construction is one of the largest industry sectors in Puerto Rico. Although it has been decreasing due to the housing crisis of 2006, it is expected to grow in the following years. This is due to the reconstruction funds allocated by the federal government following the 2017 hurricanes.

This growth will require training and retraining of members of the labor force to satisfy the demand of labor in this sector. The training required for these trades is not commonly offered in traditional post-secondary institutions.

**Graph 8. Construction Sector Employment Projection**



Source: PR Department of Labor & Human Resources (2020). Household Survey.

As stated before, the construction sector in Puerto Rico will grow in the following years, requiring trained personnel to satisfy the increase in demand. In 2018, the construction sector exhibited its first growth in employment since 2012. During those years, the

disbursement of federal funds for diverse reconstruction and recovery projects had a positive effect in the amount of employment in this sector. In the year 2012, when the American Recovery and Reinvestment Act had been in effect, the employment in the construction sector increased by 11.3%. Following a similar pattern as in 2012, employment increased in the years 2018 and 2019, the same time period in which FEMA funds were assigned to the island. Since these disbursements are only 30% from the total allocated funds for recovery, it can be argued that employment in the construction sector will be steadily increasing until all funds have been disbursed.

**Table 10. Construction Employment**

<b>Fiscal Year</b>	<b>Construction Employment</b>	<b>Change (Absolute)</b>
2019	48,000	
2020	50,686	2,686
2021	51,567	881
2022	57,075	5,508
2023	61,676	4,602
2024	64,151	2,474

Source: Estimates by Estudios Técnicos, Inc.

Among other effects of the arrival of federal recovery funds are the increase in the construction sector employment. According to estimates from Estudios Técnicos, the average increase in employment in the construction sector will be of 3,230 per year. In total, approximately 16,000 jobs in the construction sector are estimated to be created from 2020 to 2023.

In addition to the total increase in employment, the turnover in the construction sector needs to be considered for training purposes. The employment turnover consists in the percentage of job openings that are posted at the end of a period. This means another amount of potentially new workers in the field. As reported by the U.S. Bureau of Labor Statistics, the rate of job openings in the construction sector for December 2019, was 3.1%. This rate was applied to the previously presented projections and the results are presented in the following table.

**Table 11. Construction Training Demand**

<b>Fiscal Year</b>	<b>Construction Employment</b>	<b>New Employees</b>	<b>Construction Industry Turnover (3.1%)</b>	<b>Total Training Demand</b>
2019	48,000			

Fiscal Year	Construction Employment	New Employees	Construction Industry Turnover (3.1%)	Total Training Demand
2020	50,686	2,686	1,571	<b>4,257</b>
2021	51,567	881	1,599	<b>2,480</b>
2022	57,075	5,508	1,769	<b>7,277</b>
2023	61,676	4,602	1,912	<b>6,514</b>
2024	64,151	2,474	1,989	<b>4,463</b>
	<b>Total</b>	<b>16,151</b>	<b>8,840</b>	<b>24,991</b>

Source: Estimates by Estudios Técnicos Inc

Note: The construction industry turnover is published by the Bureau of Labor Statistics:

<https://www.bls.gov/jlt/>

The total sum of the new employees per year and the industry turnover results in the total demand for training for that year. The total training demand is almost 25,000 persons. It is worth mentioning that not all these jobs belong to trades that are associated with formal instruction.

Below follows an estimate of which instructional programs (CIP) -post-secondary educational programs, of any length- will be needed to satisfy this increase in job openings in the construction industry.

**Table 12. Educational Program to Satisfy the Job Opening in the Construction Industry**

Instructional Program Description	CIP CODE	Annual Graduates	Total Employment 2018	Job Openings	Demand by Instructional Program
Other Non-degree disciplines	99.9999	-	328,103	36,091	36,091
General Office Occupations and Clerical Services	52.0408	55	23,512	2,318	2,263
Truck and Bus Driver/Commercial Vehicle Operator and Instructor	49.0205	-	15,914	1,683	1,683
Receptionist	52.0406	-	10,540	1,344	1,344
Executive Assistant/Executive Secretary	52.0402	219	13,627	1,282	1,063
Floriculture/Floristry Operations and Management	01.0608	42	9,940	1,051	1,010
Customer Service Support/Call Center/Teleservice Operation	52.0411	-	7,526	954	954
Accounting Technology/Technician and Bookkeeping	52.0302	51	9,370	999	948
Home Health Aide/Home Attendant	51.2602	63	7,298	958	895
Building/Property Maintenance	46.0401	19	9,180	913	893



Instructional Program Description	CIP CODE	Annual Graduates	Total Employment 2018	Job Openings	Demand by Instructional Program
Office Management and Supervision	52.0204	233	11,246	1,064	831
Administrative Assistant and Secretarial Science, General	52.0401	573	14,846	1,397	823
Sales, Distribution, and Marketing Operations, General	52.1801	6	7,305	740	734
Teacher Assistant/Aide	13.1501	235	9,565	928	693
Banking and Financial Support Services	52.0803	163	7,850	763	600
Criminalistics and Criminal Science	43.0111	102	10,485	675	573
Selling Skills and Sales Operations	52.1804	-	4,823	546	546
Operations Management and Supervision	52.0205	33	6,223	490	458
Retailing and Retail Operations	52.1803	-	3,278	433	433
Quality Control Technology/Technician	15.0702	11	3,518	387	376
Medical Office Management/Administration	51.0705	9	3,980	376	368
General Merchandising, Sales, and Related Marketing Operations, Other	52.1899	1	3,647	364	362
Finance, General	52.0801	278	7,936	627	348
Teacher Education, Multiple Levels	13.1206	111	6,970	459	348
Industrial Mechanics and Maintenance Technology	47.0303	26	3,493	350	324
Construction/Heavy Equipment/Earthmoving Equipment Operation	49.0202	-	3,168	317	317
Insurance	52.1701	2	3,493	296	294
Other Academic Programs		56,218	297,638	25,688	- 30,530
<b>Total</b>		<b>58,450</b>	<b>844,474</b>	<b>83,491</b>	<b>25,042</b>

Source: IPEDS data, 2020. Bureau of Labor Statistics, 2020. Estimates by Estudios Técnicos.

A conversion from the occupation to instructional program was applied to determine the projected demand for instructional disciplines in the construction sector. Using a crosswalk from the Analyst Resource Center, the occupation by SOC code was converted to instructional programs by CIP codes. From the crosswalk and labor data, one can observe that the relationship between employment and instructional programs is not always one-to-one but may be one-to-many or not have a relationship with an instructional program at all. This information is reflected in the construction sector as it is

found that there are multiple construction jobs, including construction laborers, that are non-degree requiring occupations and, therefore, are not represented by any CIP code.

### **Life sciences: pharmaceutical manufacturing**

Two segments of the pharmaceutical industry are currently experiencing excellent growth in the world's markets: (1) generic medications and (2) biologicals. Therefore, the panorama for growth in both fields represents an excellent opportunity for Puerto Rican labor. Some of the strategies involve:

- Protecting existing pharmaceutical operations through collaboration with companies in this sector
- Actively intervening in the sale of closed plants or plants in the process of closing, ensuring a connection to interested companies so that they may take over or adapt the operation of those plants, thereby minimizing downtime
- Fostering the establishment of a pharmaceutical industry specializing in the production of generics and biologicals, using local capital investment. Use the Puerto Rico Industrial Development Corporation (PRIDCO) as a partner for businesses
- Attracting retail packaging and distribution operations to complement already existing manufacturing operations
- Developing local abilities for pharmaceutical research and development in order to create intellectual property in Puerto Rico
- Developing joint training programs with universities and companies in the private sector in order to strengthen the future labor force and offer better job and growth opportunities

With five decades of pharmaceutical manufacturing, Puerto Rico has a highly experienced workforce knowledgeable in GMP, FDA and other global regulations. Although 60% of employees in the life sciences have at least a bachelor's degree, Puerto Rico offers the lowest labor costs of any region under U.S. jurisdiction – with hourly earnings in manufacturing averaging 65% to 80% of the U.S. average.

### **Life sciences: manufacturing of medical devices**

This sector is expected to experience a growth rate of 6% per year through 2020. Puerto Rico is in a unique position to take advantage of this trend, with an impressive history of \$4.5 billion in exports in the manufacturing of medical devices, along with thirteen of the world's twenty largest firms in this sector are in Puerto Rico. Some of the strategies involve:

- Attracting new lines of production to companies established in Puerto Rico
- Fostering research and development, and manufacturing of new products in Puerto Rico

- Focusing promotional efforts in high-growth sectors and corporations, especially including companies in the fields of orthopedics, trauma, invasive surgery, and visual devices
- Attracting companies within the medical devices supply chain, in order to consolidate the cluster and expand growth horizons
- Workforce advantages in this sector are comparable to that of the pharmaceutical manufacturing subsector.

### **Agricultural biotechnology**

According to Puerto Rico Industrial Development Company, Puerto Rico has emerged as an important center for agricultural biotechnology. There's ongoing research with corn, soy, sorghum, sunflower, cotton, among others since 1983. It is one of the fastest growing sectors and is supported by the following conditions: year around stable weather and environmental conditions, skilled and professional labor, soil quality, proximity to the U.S., rapid transportation system, agricultural academic research centers, and intellectual property protection. Pioneer Hi-Bred, BASF Agrochemical, Bayer-Crop science, Syngenta Seeds and Rice Tec are among many seed companies that have found the island to be fertile ground for research and development. The sector is made up of 18% of all agricultural employment (over 2,500 employees). Puerto Rico must become a center for the scientific production and improvement of seeds in Latin America, and it must become a leader in an industry that is slated to grow at 6% per year. Some of the strategies involve:

- Supporting the expansion of production by companies currently doing business in Puerto Rico by preparing personalized offers
- Attracting additional companies in this sector by promoting existing incentives, infrastructure, and talent in Puerto Rico
- Fostering additional research and development in this sector

A highly educated workforce is sustained by an array of current programs, including: those offered at the Biotechnology Development and Training Center at the Mayagüez campus of the UPR, which is a public-private initiative that offers customized training programs for students and employees with degrees in science and engineering. In addition, pharmaceutical professionals who want to transition into the life sciences. There is a five-year bachelor's degree in industrial biotechnology from the UPR, Mayagüez campus, and Ph.D. programs in biomedical science from the UPR, Medical Sciences campus, and the Ponce School of Medicine/Pontifical Catholic University of Puerto Rico.

## Outsourcing

Puerto Rico is quickly emerging as a knowledge-services hub both for online monitoring as well as telecommunication-related operations like call centers. Income from outsourcing or expert services at the global level is estimated to be some \$506 billion in the first half of 2018<sup>1</sup>. The industry is composed of four segments: (1) outsourcing of information technology, (2) outsourcing of business processes, (3) outsourcing of knowledge processes, and (4) outsourcing of engineering and R&D. Some of the strategies involve:

- Creating an outsourcing cluster linking universities, the private sector, and government
- Developing training programs in coordination with universities and companies in this sector, which includes offering students' internships in various companies within the sector
- Attracting large operations offering Business Process Outsourcing (BPO) and integrated outsourcing services through aggressive and personalized promotion
- Promoting the development of local software for eventual export, through promotion of current legislation
- Expanding the aerospace and defense sector, paying special attention to outsourcing in the area of research and development

## Maintenance, repair, and operations (MRO) cluster

The MRO market is projected to total \$76 billion by 2022, some 36% more than the current \$56 billion. The trend shows that airlines are increasingly interested in outsourcing their secondary activities. An MRO cluster could represent as much as \$600 million to the GDP with important effects on small and medium businesses and local economies. Aside from the principal services of assembly, cleaning, and coordination, most of the jobs are provided by businesses with fewer than 10 employees. Puerto Rico's MRO cluster would be located in the aerospace triangle in the northwest part of the island, whose center is in Aguadilla. This region has proved itself to be one of the driving forces of the aviation industry in Puerto Rico, with emphasis on the aerospace industry. Some of the strategies involve:

- Beginning operations of Lufthansa Technik in 2015

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<sup>1</sup> FN: IDC (2018). Worldwide Services Revenue Led by Steady Growth in the Americas During the First Half of 2018, According to IDC (November 15, 2018). At: <https://www.idc.com/getdoc.jsp?containerId=prUS44448618>.

- Creating an MRO school in Aguadilla and adapting its program to current university curricula in order to ensure quantity and quality of the labor force, helping to support the industry's development
- Identifying opportunities for set up businesses and creating links to the existing aerospace industry in Puerto Rico

A highly educated and skilled workforce supports this sector. Puerto Rico is home to two of the top 35 largest engineering programs in the nation at the Polytechnic University of Puerto Rico and the UPR, Mayagüez Campus. More than 20,000 degrees in science, engineering and technology are awarded each year by colleges on the Island.

### **Tourism**

A Destination Marketing Organization (DMO) seeks to professionalize and give consistency to Puerto Rico's brand as a major tourist destination in the Caribbean and be recognize as a premier destination globally.

Tourism marketing strategies beyond the act will be based on the needs and trends of the national and global market. Through the DMO, Puerto Rico will display as a trademark the culture, natural sites, culinary experiences, and entertainment. Among its first initiatives should be the creation of a permanent brand for Puerto Rico. The brand will help leave behind the inconsistency of the brand and react quicker to market needs.

The Corporation for the Promotion of Puerto Rico as a Destination (DMO) officially begun its work on August 2, 2017, with the appointment of its board members and the creation of internal committees.

### **Aerospace**

In recent years, Puerto Rico has become a magnet for some of the world's leading aviation and aerospace companies. With a long history of manufacturing expertise and a strong pipeline of engineering talent, the island has attracted multimillion-dollar investments by these and other major firms during recent years:

- Pratt & Whitney is performing engineering design and analysis for the jet turbine power plants of several aircraft from its Infotech Aerospace Service's division.
- Lockheed Martin has more than 60 employees conducting software support services from Puerto Rico for its global operations.
- Honeywell Aerospace employs more than 400 people in its shared services center that supports the company's global defense and space business.
- Hamilton Sundstrand manufactures aircraft climate control and electronic systems at its Puerto Rico plant, employing more than 900 workers.
- AXON Group and Pratt & Whitney established a world-class SAP services center that will create 300 jobs.

- Florida Turbine and ESSIG Research both have major operations on the island.

### Employment Forecasting

According to PRDOLHR's Long-Term Occupations Demand 2016-2026, the top three industries of mayor employment growth will be in Food, Health, and Administrative services. Furthermore, the industries with the highest projected employment are Self-Employed (132,587), Administrative and Support (72,958), Food Services and Drinking Places (70,228), Ambulatory Health Care (43,777), and Professional, Scientific, and Technical services (32,174).

Table 13. Industries estimated job increases

NAICS Code	NAICS Title	Projected 2026	Total increase	Change (%)
722000	Food Services and Drinking Places	70,228	8,736	14.2%
621000	Ambulatory Health Care Services	43,777	7,243	19.8%
561000	Administrative and Support Services	72,958	6,102	9.1%
6010	Total Self Employed Not Incorporated	132,587	5,428	4.3%
446000	Health and Personal Care Stores	22,443	3,774	20.2%
523000/524000	Securities, Commodity Contracts, and Other Financial Investments and Related Activities/Insurance Carriers and Related Activities	17,514	1,844	11.8%
541000	Professional, Scientific, and Technical Services	32,174	1,680	5.5%
424000	Merchant Wholesalers, Nondurable Goods	18,412	1,562	9.3%
452000	General Merchandise Stores	27,446	1,468	5.7%
623000	Nursing and Residential Care Facilities	7,443	1,153	18.3%
551000	Management of Companies and Enterprises	14,614	837	6.1%
488000	Support Activities for Transportation	5,530	804	17.0%
531000	Real Estate	11,363	755	7.1%
485000	Transit and Ground Passenger Transportation	3,230	682	26.8%
562000	Waste Management and Remediation Service	4,221	548	14.9%
512000	Motion Picture and Sound Recording Industries	3,483	530	17.9%

NAICS Code	NAICS Title	Projected 2026	Total increase	Change (%)
453000	Miscellaneous Store Retailers	5,481	501	10.1%
518000	Data Processing, Hosting and Related Services	2,812	402	16.7%
713000	Amusement, Gambling, and Recreation Industries	3,478	366	11.8%
812000	Personal and Laundry Services	5,423	333	6.5%

Source: PRDOLHR: Long Term Projections by Industry 2016-2026.

As per the same report, the industries with the largest estimated employment decreases between 2016-2026 are State and Local Government, and Educational Services, signifying in a potential reduction of around 30,000 jobs.

**Table 14. Industries with largest estimated job decreases**

NAICS Code	NAICS Title	Projected 2026	Total decrease	Change (%)
920000	State Government, Excluding Education and Hospitals	70,934	-18,742	-20.9%
930000	Local Government, Excluding Education and Hospitals	49,088	-6,348	-11.5%
611000	Educational Services	88,514	-4,995	-5.3%
236000	Construction of Buildings	7,903	-2,465	-23.8%
448000	Clothing and Clothing Accessories Stores	16,297	-2,399	-12.8%
311000	Food Manufacturing	9,367	-2,178	-18.9%
313000/314000/315000	Textile Mills, Textile Product Mills, and Apparel Manufacturing	4,405	-2,091	-32.2%
622000	Hospitals	29,837	-1,689	-5.4%
624000	Social Assistance	9,078	-1,398	-13.3%
522000	Credit Intermediation and Related Activities	11,916	-1,271	-9.6%
517000	Telecommunications	6,932	-1,105	-13.8%

NAICS Code	NAICS Title	Projected 2026	Total decrease	Change (%)
334000	Computer and Electronic Product Manufacturing	4,200	-1,080	-20.5%
325000	Chemical Manufacturing	16,307	-1,070	-6.2%
339000	Miscellaneous Manufacturing	10,363	-908	-8.1%
721000	Accommodation, including Hotels and Motels	13,586	-901	-6.2%
444000	Building Material and Garden Equipment and Supplies Dealers	7,707	-730	-8.7%
335000	Electrical Equipment, Appliance, and Component Manufacturing	3,686	-600	-14.0%
493000	Warehousing and Storage	1,208	-592	-32.9%
332000	Fabricated Metal Product Manufacturing	2,451	-559	-18.6%
237000	Heavy and Civil Engineering Construction	2,851	-481	-14.4%

Source: PRDOLHR: Long Term Projections by Industry 2016-2026.

### iii. Employers' Employment Needs

With regard to the industry sectors and occupations identified in (A)(ii) and (iii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

#### Industries

In 2018, the industries with the most difficult establishments to fill vacancies were Other Services, Agriculture and Mining, Real Estate and Leasing, and Professional, Scientific, Technical Services. Additionally, the jobs with the highest rate of job vacancies were Transportation Warehousing (49.3%), Agriculture and Mining (27%), and Utilities (22.6%).



Table 15. Industries with most difficult to fill vacancies, vacancies' rates and over-qualification rates, 2018

Industry	Establishments with difficult to fill vacancies (%)	Job vacancies' rate (%)	Over-qualification rate (%)
Other services	89.3%	6.0%	30.6%
Agriculture and Mining	86.6%	27.0%	47.2%
Real Estate and Leasing	78.8%	2.1%	64.4%
Professional, Scientific, Technical Services	77.0%	4.9%	25.7%
Transportation and Warehousing	70.7%	49.3%	37.1%
Health Care and Social Services	68.5%	2.7%	28.5%
Administrative Services and Support	67.5%	4.0%	47.0%
Construction	66.7%	4.9%	48.1%
Manufacturing	64.8%	1.9%	40.3%
Educational Services	51.7%	3.0%	22.8%
Retail Trade	48.3%	2.6%	44.6%
Accommodation and Food Services	46.9%	5.4%	69.4%
Wholesale Trade	45.0%	1.2%	49.5%
Public Administration	27.1%	12.2%	57.8%
Finance and Insurance	23.7%	4.3%	43.9%
Information	22.6%	13.0%	85.3%
Art, Entertainment and Recreation	21.6%	4.0%	81.3%
Management	0.0%	1.1%	0.0%
Utilities	0.0%	22.6%	0.0%

Source: PRDOLHR, Skills and Occupations in High-Demand, 2018.

## Occupancies

Out of the top ten occupancies with vacancies most difficult to fill, three required high school diploma or equivalent while four did not require any formal educational credential. Moreover, four of the occupations were related to repair, maintenance, and/or equipment work. Another two were associated with food preparation and fast food cooks.

Table 16. Occupations with the most difficult to fill vacancies, 2018

SOC Code	Occupation Title	Vacancy Rate (%)	Education
45-2092	Farmworkers and Laborers, Crop, Nursery, and Greenhouse	5.3	No formal educational credential
35-2011	Cooks, Fast Food	3.0	No formal educational credential
43-3031	Bookkeeping, Accounting, and Auditing Clerks	2.8	Some college, no degree
49-9071	Maintenance and Repair Workers, General	2.7	High school diploma or equivalent
35-2020	Food Preparation Workers	2.3	No formal educational credential
49-3023	Automotive Service Technicians and Mechanics	2.2	Postsecondary nondegree award
43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	2.0	High school diploma or equivalent
45-2091	Agricultural Equipment Operators	1.9	No formal educational credential
47-4021	Elevator and Escalator Installers and Repairers	1.9	High school diploma or equivalent
41-3099	Sales and Related Workers, All Other	1.9	No formal educational credential

Source: PRDOLHR, Skills and Occupations in High-Demand, 2018.

Table below shows the skillsets that are most sought from employers, according to the PRDOLHR employee survey. Punctuality and responsibility remain as top skills followed by the ability to follow instructions, verbal and written communication, teamwork, and customer oriented. Most of the essential abilities required can be labeled as “soft skills”, meaning that employers are looking for employees that meet skills beyond technical and academic competencies.

The over qualification rate could be used as a proxy of the industries in need of more education and training. Industries with low over qualification rate means that the new employees had the exact or less level of education recommended for the position. The industries with the lowest over-qualification rates were Management, Utilities, educational services, and professional, scientific and technical services.

Table 17. Most important skillsets sought by an employer, 2018

Skill	%
Punctuality and responsibility	84.3
Capacity to follow instructions	78.4
Oral and writing communication	62.6
Teamwork capacity	60.9
Ability to provide customer service	55.8
Learning capacity	55.7
Ability to anticipate and avoid problems	37.5
Ability to identify and solve problems	36.9
Ability to work under minimum supervision	36.9
Ability to work under pressure	35.6

Source: PRDOLHR, Skills and Occupations in High Demand 2018

### (b) *Workforce Analysis*

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes –

#### i. Employment and Unemployment

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

### **Employment, Unemployment and Labor Force Participation**

The labor force in Puerto Rico has been contracting since the start of the Puerto Rican recession in FY 2017. From 2007 through 2019, the labor force fell 24%. For this reason, the labor force participation rate plunged from 48.6% in 2007 to 40.6% in 2019. In other words, 6 of every 10 people who are of working age are not in the labor market. Since 2010, unemployment on the Island has decreased in number and rate. However, Puerto Rico continue being the jurisdiction with the highest unemployment rate among all states. Even more significant, Puerto Rico's low labor force participation rate remains not just as the lowest among all jurisdictions but also one of the lowest in the World.

Table 18. Average labor force, participation and unemployment, 2000-2019

FY	Non-institutionalized civil population 16 years and over (000s)	Labor force (000s)	Labor force participation rate (%)	Unemployment (000s)	Unemployment rate (%)
2000	2,797	1,292	46.2%	142	11.0%
2001	2,808	1,274	45.4%	133	10.5%
2002	2,842	1,301	45.8%	156	12.0%
2003	2,870	1,337	46.6%	162	12.1%
2004	2,884	1,339	46.4%	152	11.4%
2005	2,886	1,357	47.0%	144	10.6%
2006	2,899	1,410	48.6%	156	11.0%
2007	2,906	1,413	48.6%	150	10.6%
2008	2,908	1,355	46.6%	152	11.2%
2009	2,910	1,325	45.5%	181	13.7%
2010	2,915	1,285	44.1%	210	16.3%
2011	2,911	1,245	42.8%	201	16.2%
2012	2,895	1,206	41.7%	183	15.2%
2013	2,880	1,177	40.9%	165	14.0%
2014	2,859	1,153	40.3%	165	14.3%
2015	2,829	1,121	39.6%	145	13.0%
2016	2,799	1,121	40.0%	131	11.7%
2017	2,763	1,109	40.1%	128	11.5%
2018	2,710	1,086	40.1%	112	10.3%
2019	2,658	1,079	40.6%	91	8.5%

Source: PR Department of Labor and Human Resources.

Puerto Rico's recession has impacted the labor participation rate among young age groups. From 2015 to 2017, the age group of 20 to 24 years old was the group with the largest decrease in participation rate (-4.7%). With a participation rate of 43.4%, Puerto Rico remains well below the participation of 63.2% observed in US. The biggest differences in participation rates among age groups are noted in the age groups of 16 to 24 years old and 55 to 64 years old.

Table 19. Population by age in labor force (%), 2015 and 2017

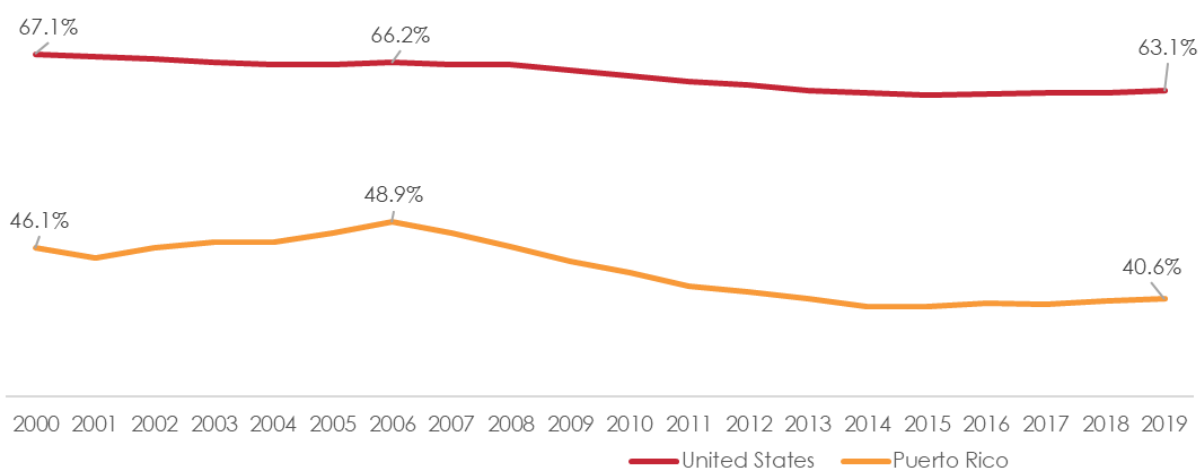
Age	PR 2015	PR 2017	Change 2015-2017	US 2017	Difference PR-US
16 years and over	44.7%	43.4%	-1.3%	63.2%	-19.8%
16 to 19 years	14.9%	13.3%	-1.6%	38.3%	-25.0%
20 to 24 years	53.4%	48.7%	-4.7%	74.8%	-26.1%
25 to 29 years	73.0%	70.2%	-2.8%	82.8%	-12.6%
30 to 34 years	74.8%	72.9%	-1.9%	82.8%	-9.9%
35 to 44 years	73.1%	72.6%	-0.5%	82.4%	-9.8%
45 to 54 years	60.5%	61.9%	1.4%	80.6%	-18.7%
55 to 59 years	42.3%	44.0%	1.7%	72.3%	-28.3%
60 to 64 years	25.2%	28.4%	3.2%	57.0%	-28.6%
65 to 74 years	9.6%	9.6%	0.0%	25.8%	-16.2%
75 years and over	2.7%	2.9%	0.2%	6.8%	-3.9%

Source: U.S. Census Bureau, 2017 and 2015 American Community Survey 1-Year Estimates

Graph 9. Civilian Labor Participation Rate

Civilian Labor Participation Rate

2000-2019



Source: BLS (2020). CES, LAUS.

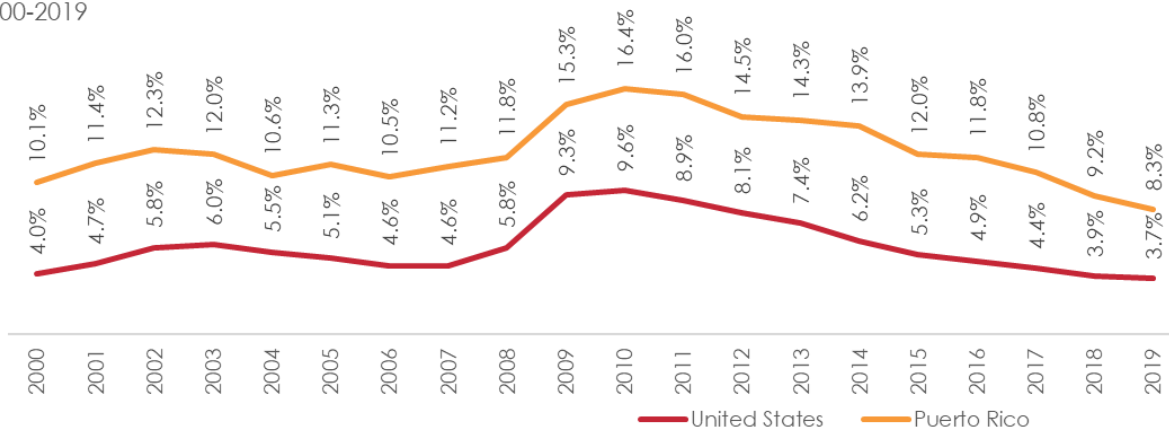
The Federal Reserve Bank of New York (FRBNY) characterized Puerto Rico's labor market as being "quite weak" (an update in the competitiveness of the Puerto Rican economy, 2014). Along with the wide gap that persists between the unemployment rates of Puerto Rico and the US. The low rate of participation in the labor force, particularly among less

educated workers was stressed by the FRBNY as the most important factor in the labor market limiting the island’s competitiveness. It further urged to counter skills atrophy through the promotion of work experience and creating jobs and encouraging active participation in the labor market, especially for the young uneducated.

Graph 10. Unemployment Rate

**Unemployment Rate**

2000-2019



Source: BLS (2020). CES, LAUS.

**Youth Workforce Participation**

The Youth Development Institute (YDI) of Puerto Rico, a nonprofit organization working to advance public policies- at both the federal and commonwealth level- that improve the lives of children and youth in Puerto Rico, presented a recommendation focuses on targeting the youth workforce development outcomes by providing specific youth workforce participation data for Puerto Rico.

Moreover, comparing employment and educational attainment data between years 1990, 2000 and 2016, the YDI can observe an important increase for youth ages 16 to 25 in Puerto Rico. However, these improvements have not translated to decreases in poverty levels among the same population; Puerto Rico's youth workforce remains poor. These statistics pre-date Hurricane Maria but taken together they present a sobering picture of the state of youth employment prior to the hurricane and will likely be exacerbated by current conditions in Puerto Rico.

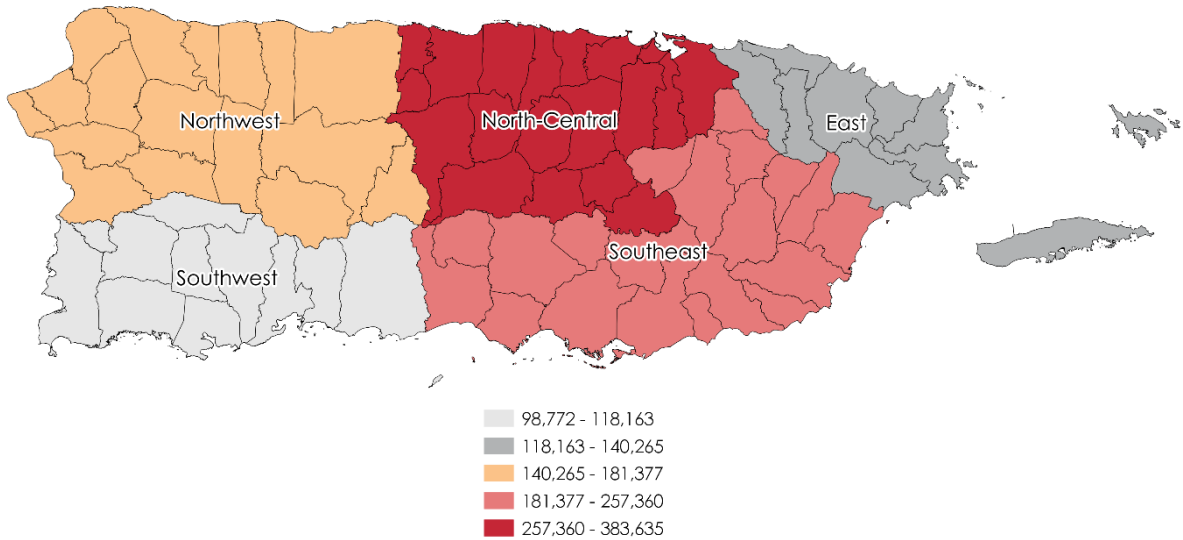
Other recent natural disasters, including the Southeast earthquakes at the end of 2019 and first months of 2020 could impact the labor market indicators, especially in the impacted region.

**Employment and unemployment by region and local area**

Employment in Puerto Rico is concentrated in the metropolitan area. This area has most of the establishments and an important share of the population of Puerto Rico. Most of

the metropolitan area is within the North Central Region. The North-Central region employment relies on service industries, including educational services, finance and insurance services, and commerce.

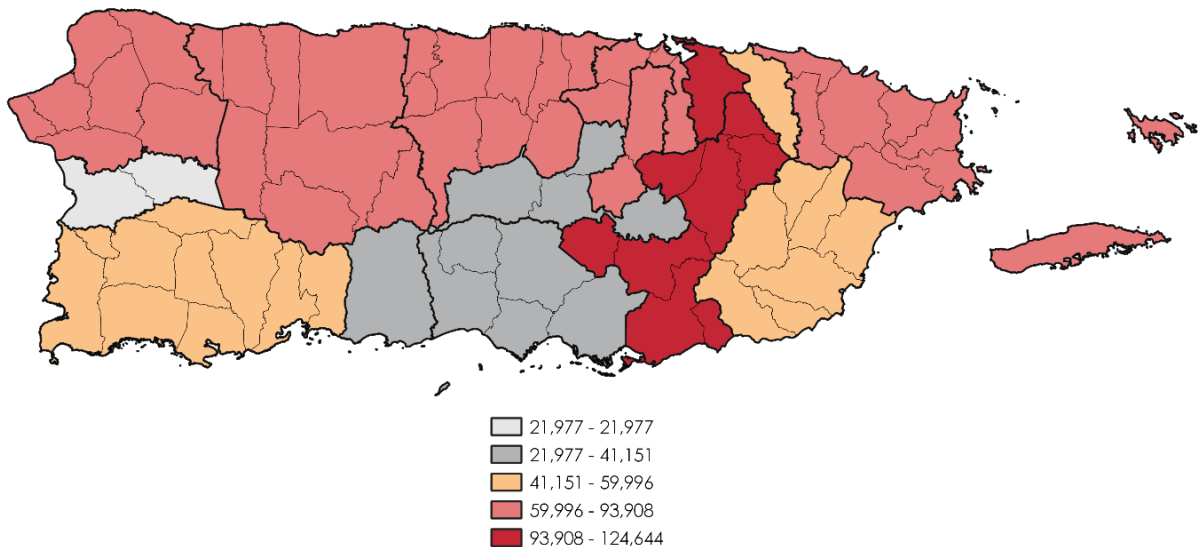
Figure 2. Unemployment by Area, 2018



Source: Puerto Rico Department of Labor and Human Resources.

Observing the distribution of employment among the local areas, we identified the local areas of San Juan and Caguas-Guayama (in red) as the top areas in terms of employment. Other local areas with significant number of employees are in the North of the Island.

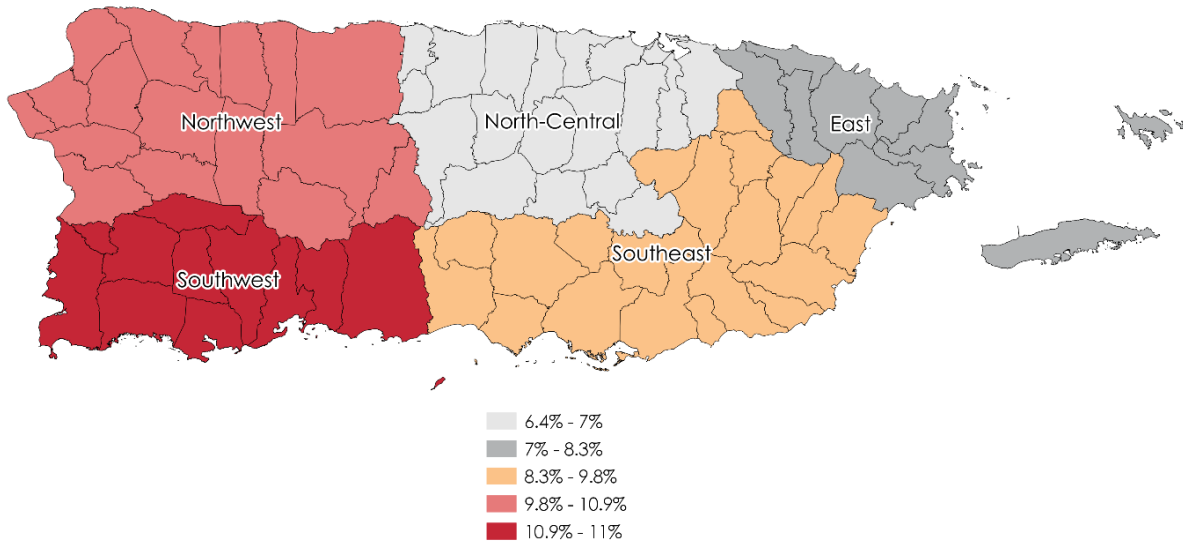
Figure 3. Employment by Area, 2018



Source: Puerto Rico Department of Labor and Human Resources.

Observing the unemployment rate among the region areas, we identified the southwest region (in red) as the top region in terms of unemployment.

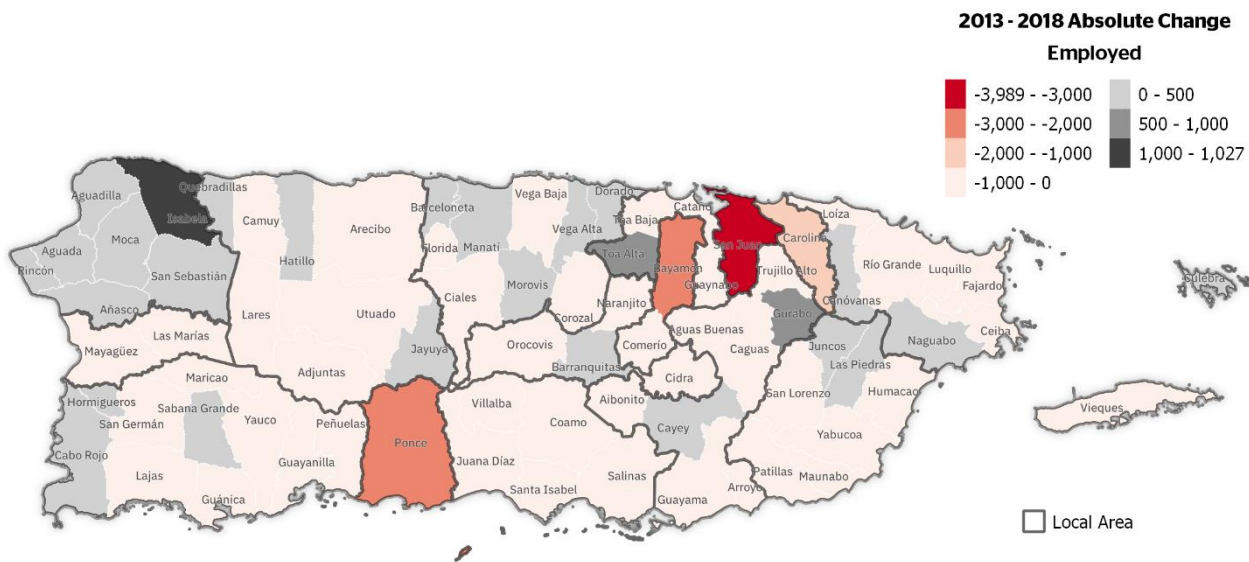
Figure 4. Unemployment Rate by Regions, 2019



Source: Puerto Rico Department of Labor and Human Resources.

Between 2013 and 2018, there were lost almost 15,000 jobs. The local areas of San Juan, Bayamón-Comerío, and Ponce were the areas that lost the most jobs. A local area that stands out is the Northeast area (#2) showing that all municipalities within that area have lost jobs.

Figure 5. Employed Absolute Change (2013-2018)

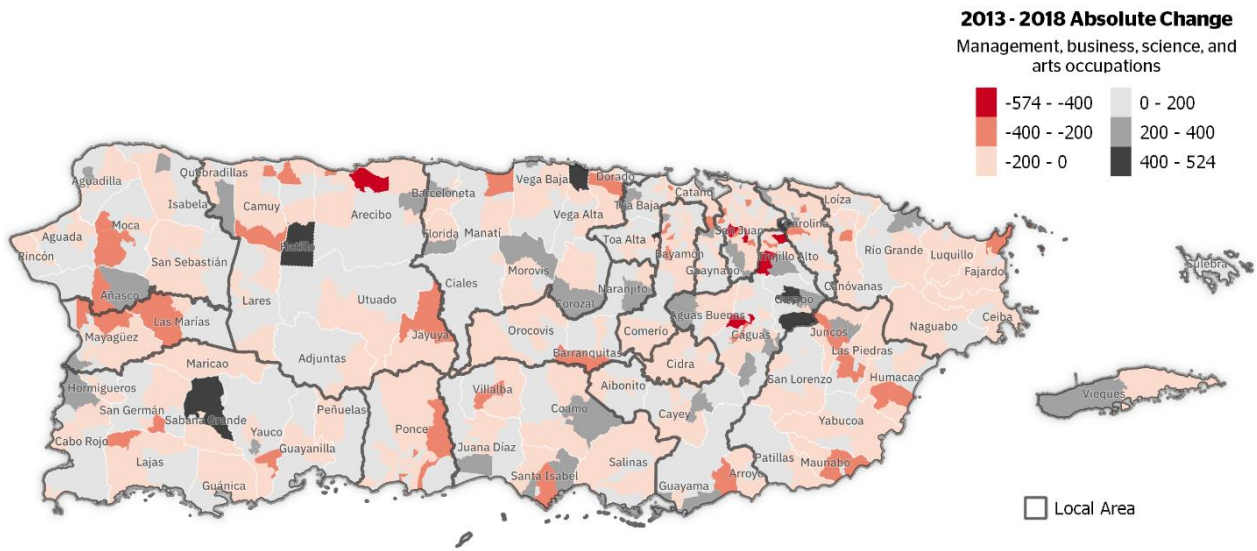


Source: BLS, LAUS. Labor Force Data by County, 2013-2018 Annual Averages



The map below shows the absolute change in the management, business, science, and arts occupations, between 2013 and 2018.

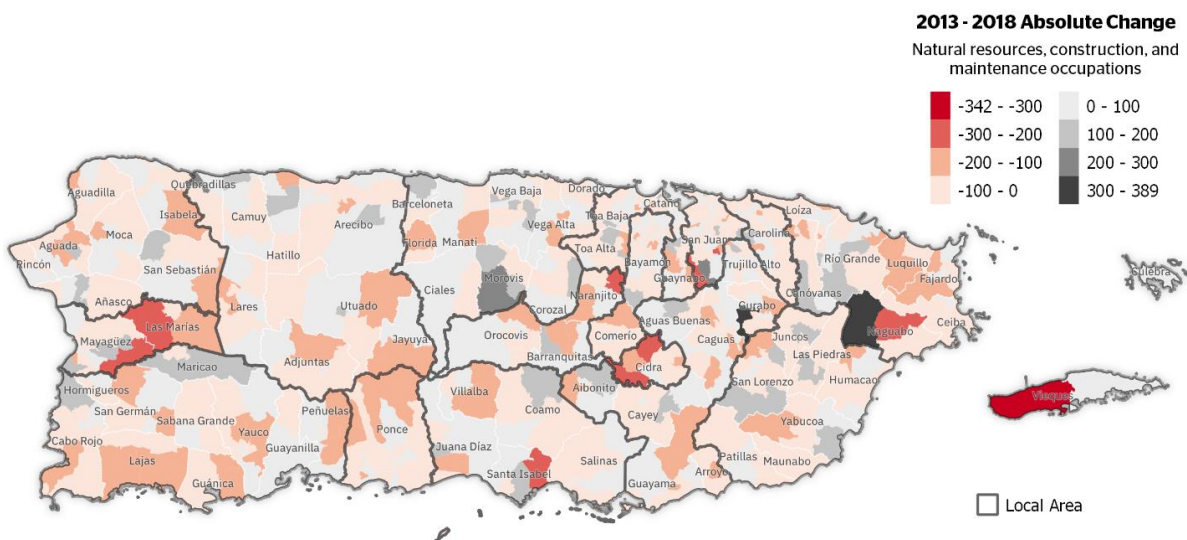
Figure 6. Management, Business, Science, and Arts Occupations Absolute Change (2013-2018)



Source: U.S. Census Bureau, 2009-2013 - 2014-2018 American Community Survey 5-Year Estimates

The map below shows the absolute change in natural resources, construction, and maintenance occupations, between 2013 and 2018.

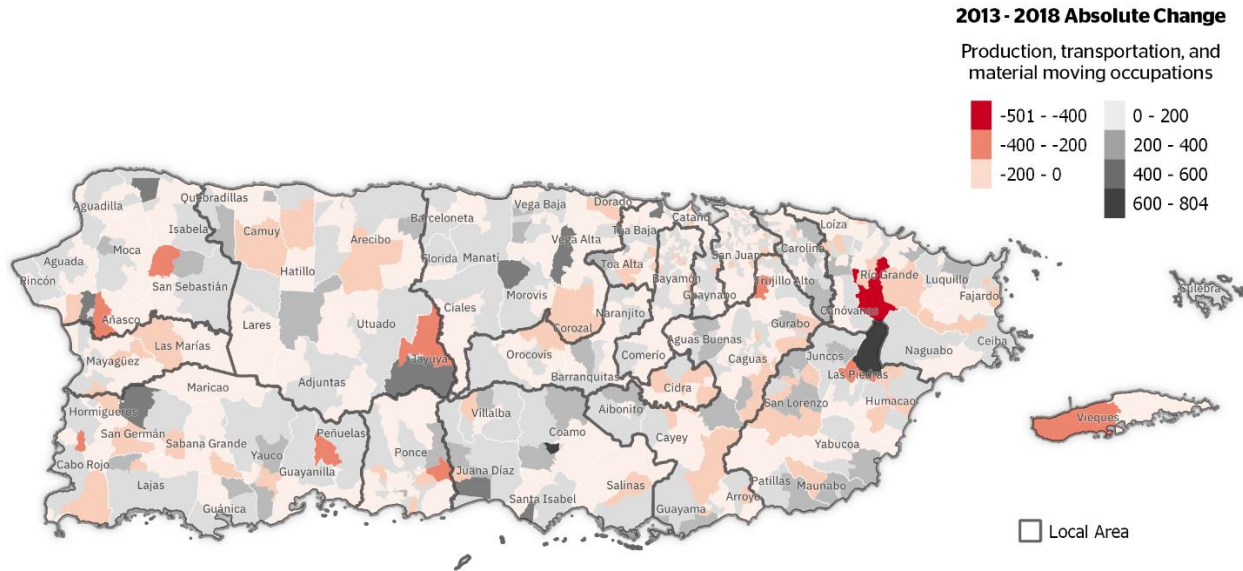
Figure 7. Natural Resources, Construction, and Maintenance Occupations Absolute Change (2013-2018)



Source: U.S. Census Bureau, 2009-2013 - 2014-2018 American Community Survey 5-Year Estimates

The map below shows the absolute change in production, transportation, and material moving occupations, between 2013 and 2018.

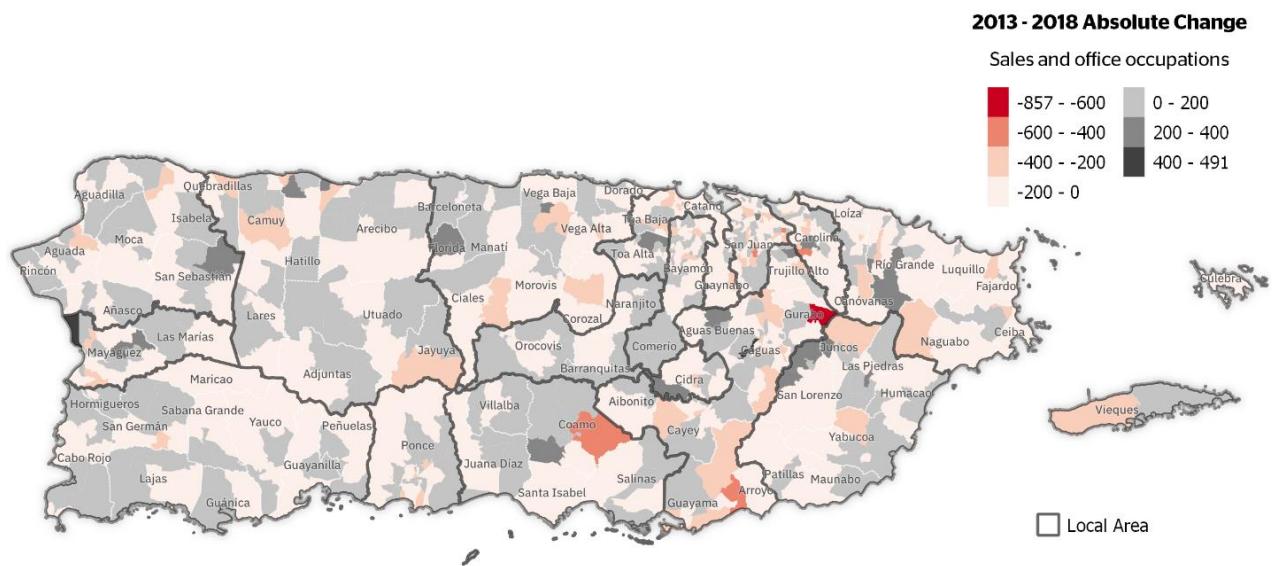
Figure 8. Production, Transportation, and Material Moving Occupations Absolute Change (2013-2018)



Source: U.S. Census Bureau, 2009-2013 - 2014-2018 American Community Survey 5-Year Estimates

The map below shows the absolute change in sales and office occupations, between 2013 and 2018.

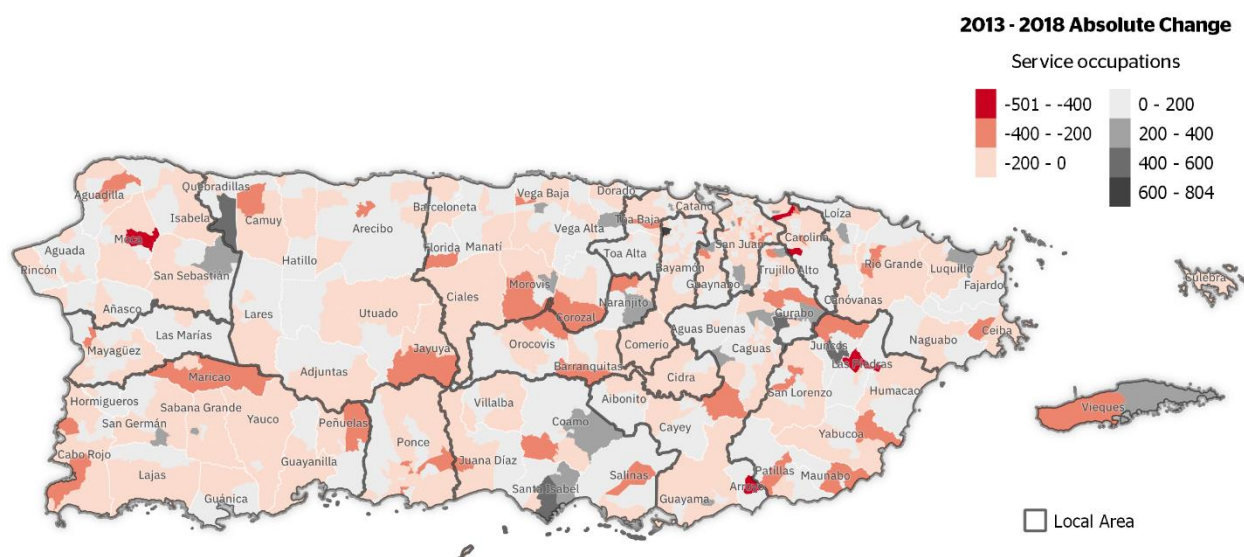
Figure 9. Sales and Office Occupations Absolute Change (2013-2018)



Source: U.S. Census Bureau, 2009-2013 - 2014-2018 American Community Survey 5-Year Estimates

The map below shows the absolute change in services occupations, between 2013 and 2018.

Figure 10. Service Occupations Absolute Change (2013-2018)



Source: U.S. Census Bureau, 2009-2013 - 2014-2018 American Community Survey 5-Year Estimates

### Individuals with barriers to employment

In 2018, Puerto Rico had a population of 3.2 million with 1 million people in the labor force. Many economic, political, and social factors contributed to having a proportionally large population with barriers to employment. A consequence of this situation is the low participation rate and the high unemployment mentioned before. Among the top groups with barriers to employment are individuals below poverty levels, SNAP recipients, individuals with disabilities, and older individuals.

Table 20. Population with Barrier to Employment in Puerto Rico

Populations	Persons	%	Source
Total population (2018)	<b>3,195,153</b>		<b>US Census Bureau</b>
Persons below poverty level	1,492,925	46.7%	ACS 2017 - 5 yrs estimate
SNAP recipients	1,222,606	38.3%	ACS 2017 - 5 yrs estimate
Individuals with disabilities	734,789	23.0%	ACS 2017 - 5 yrs estimate
Older Individuals (65+)	661,215	20.7%	US Census Bureau
English language learners	659,195	20.6%	ACS 2017 - 5 yrs estimate
Single parents	371,328	11.6%	ACS 2017 - 5 yrs estimate

Individuals with low levels of literacy	255,612	8.0%	PR Literacy Survey - 2010
Veterans	83,641	2.6%	ACS 2017 - 5 yrs estimate
Disconnected youth*	22,000	0.7%	National Kids Count Data
American Indians and other races	10,985	0.3%	ACS 2017 - 5 yrs estimate
Ex-offenders	7,663	0.2%	PRDCR
Homeless	3,501	0.1%	HUD

Source: American Community Survey 2013-2017, five-year estimates unless otherwise specified.

Note: One individual can be counted in several groups. Numbers cannot be added.

\* National Kids Count Data (Teens 16-19 not in school and not working).

### Displaced homemakers

Data are currently unavailable to accurately characterize this group as defined in section 3(16) of WIOA. ACS data estimated unpaid family workers in the population 16 years and older in the labor force to be 2,810 individuals in 2017.

### Low-income individuals

In Puerto Rico, 44.9% of the population lived below the poverty level in 2017. This share could have increased after hurricanes Irma and Maria in 2017 and the earthquakes in the Southeast of the Island between December 2019 and the start of 2020. Setting these events aside, the number of persons in poverty fell by 309,487 persons from 2010 to 2017 (mainly because of migration). Nonetheless, the share of individuals living below the poverty level remained almost unchanged. In Puerto Rico, it is more than twice the share in the US.

**Table 21. Population living below the poverty level**

	Puerto Rico		Change 2010-2017	US	Difference PR/US
	2010	2017		2017	
Population	3,634,488	3,325,001	-309,487	325,147,121	
% Below Poverty level	45.1%	44.9%	-0.2%	14.6%	21.8%

Source: U.S. Census Bureau (2019). American Community Survey 5-Year Estimates.

**Table 22. Households by income level**

	Puerto Rico		Change 2010-2017	US	Difference PR/US
	2010	2017		2017	
<b>Number of Households</b>	1,227,039	1,222,606	-4,433	118,825,921	

Less than \$10,000	29.8%	28.5%	-1.3%	6.7%	21.8%
\$10,000 to \$14,999	12.6%	11.8%	-0.8%	4.9%	6.9%
\$15,000 to \$24,999	17.7%	18.2%	0.5%	9.8%	8.4%
\$25,000 to \$34,999	12.3%	12.1%	-0.2%	9.5%	2.6%
\$35,000 to \$49,999	11.5%	11.5%	0.0%	13.0%	-1.5%
\$50,000 to \$74,999	9.1%	9.7%	0.6%	17.7%	-8.0%
\$75,000 to \$99,999	3.3%	3.9%	0.6%	12.3%	-8.4%
\$100,000 to \$149,999	2.4%	2.7%	0.3%	14.1%	-11.4%
\$150,000 to \$199,999	0.6%	0.8%	0.2%	5.8%	-5.0%
\$200,000 or more	0.7%	0.8%	0.1%	6.3%	-5.5%
Median income	\$18,791	\$19,775	984	\$57,652	-\$37,877

Source: U.S. Census Bureau (2019). American Community Survey 5-Year Estimates.

The Nutrition Assistance Program (NAP) of the Government of Puerto Rico provides a monthly benefit for nutritional assistance to low-income households. According to the American Community Survey 2017, 38.3% of households in Puerto Rico received food stamps, compared with 12.6% in the US. Among the Local Workforce Development Areas, the areas of La Montaña, Norte-Central Arecibo, and Ponce had the largest percent of households on food stamps with 49.8%, 47.1%, and 45.9%, respectively.

**Table 23. Receipt of food stamps in the past 12 months by local area, 2017**

#	Area	Households	Received food stamps in the past 12 months (#)	Received food stamps in the past 12 months (%)
	United States	118,825,921	15,029,498	12.6%
	Puerto Rico	1,222,606	467,827	38.3%
	<b>Local Workforce Development Area</b>			
1	Bayamón-Comerío	75,393	23,076	30.6%
2	Caguas-Guayama	143,708	49,297	34.3%
3	Carolina	64,056	17,082	26.7%
4	Guaynabo-Toa Baja	91,988	25,169	27.4%

5	La Montaña	37,600	18,721	49.8%
6	Manatí-Dorado	97,501	40,937	42.0%
7	Mayagüez-Las Marías	32,802	13,981	42.6%
8	Noreste	74,485	31,541	42.3%
9	Noroeste	90,963	41,425	45.5%
10	Norte-Central Arecibo	97,575	45,913	47.1%
11	Ponce	53,341	24,485	45.9%
12	San Juan	145,321	40,594	27.9%
13	Sur Central	55,985	25,340	45.3%
14	Sureste	79,675	34,400	43.2%
15	Suroeste	82,213	35,866	43.6%

Source: US Census Bureau. ACS 2017, 5 year estimate.

In Puerto Rico, the 57% of single female headed households were on food stamps, compared with 48% of single male headed households and 27% of married couples. All these percentages were higher than their US counterparts.

**Table 24. Households on food stamps by type and local area, 2017**

#	Area	Households on Food Stamps	Type of Household (% of total by type)		
			Married couple	Single male headed household	Single female headed household
	United States	15,029,498	6.8%	21.2%	35.4%
	Puerto Rico	467,827	27.2%	48.0%	56.7%
	<b>Local Workforce Development Area</b>				
1	Bayamón-Comerio	23,076	18.4%	33.3%	48.3%
2	Caguas-Guayama	49,297	23.0%	46.3%	50.2%
3	Carolina	17,082	15.7%	36.2%	47.3%
4	Guaynabo-Toa Baja	25,169	16.7%	36.1%	45.6%
5	La Montaña	18,721	39.6%	59.9%	66.0%
6	Manatí-Dorado	40,937	32.0%	52.2%	61.6%
7	Mayagüez-Las Marías	13,981	26.5%	54.6%	66.2%
8	Noreste	31,541	33.4%	47.6%	57.4%

9	Noroeste	41,425	34.0%	58.5%	65.2%
10	Norte-Central Arecibo	45,913	36.2%	61.7%	62.6%
11	Ponce	24,485	30.1%	59.1%	68.1%
12	San Juan	40,594	13.9%	32.0%	51.7%
13	Sur Central	25,340	31.9%	56.6%	61.9%
14	Sureste	34,400	32.0%	51.0%	60.8%
15	Suroeste	35,866	33.7%	56.3%	62.4%

Source: US Census Bureau. ACS 2017, 5 year estimate.

In Puerto Rico in 2017 there were 734,789 persons with disability, which represents 23% of total population, compared with 12.6% in the US. The prevalence of disability is especially significant among 35 years and more age groups.

**Table 25. Percentage of population with disability, 2012, 2017**

	<b>PR 2012</b>	<b>PR 2017</b>	<b>% Change</b>	<b>US 2017</b>	<b>Difference PR / US</b>
Total population	<b>20.8%</b>	<b>21.3%</b>	<b>0.5%</b>	<b>12.6%</b>	<b>8.7%</b>
Gender					
<b>Male</b>	20.3%	21.2%	0.9%	12.5%	8.7%
<b>Female</b>	21.2%	21.5%	0.3%	12.7%	8.8%
Age Groups					
<b>Under 5 years</b>	1.3%	1.0%	-0.3%	0.8%	0.3%
<b>5 to 17 years</b>	9.9%	10.3%	0.5%	5.4%	4.9%
<b>18 to 34 years</b>	8.5%	8.6%	0.1%	6.1%	2.5%
<b>35 to 64 years</b>	24.2%	23.0%	-1.2%	12.9%	10.2%
<b>65 to 74 years</b>	42.2%	38.6%	-3.7%	25.4%	13.2%
<b>75 years and over</b>	68.2%	63.3%	-4.9%	49.7%	13.5%

Source: U.S. Census Bureau (2019). AMS 5-Year Estimates (s1810).

In 2017, the most common disability among employed persons were ambulatory (39.5%) and vision (35.8%). The most widespread disabilities among unemployed persons were cognitive and ambulatory with 40.7% and 31.4%, respectively. Among the population not in the labor force, the most common disabilities were ambulatory difficulty and cognitive difficulty with 15.5% and 13.9%, respectively.

**Table 26. Vocational rehabilitation service customers by type of disability, PY 2015**

Type of disability	Category total	As % of all customers
Cognitive	26,541	45%
Psychosocial	11,966	20%
Physical/ambulatory	7,156	12%
Other physical/ambulatory	3,886	7%
Other mental	3,084	5%
Vision	2,342	4%
Hearing	1,467	2%
Unidentified	1,312	2%
Respiratory	1,051	2%
Speech	362	1%
Hearing and vision	3	0.01%
<b>Total</b>	<b>59,170</b>	<b>100.0%</b>

Source: PRVRA, Service statistics, PY2015.

According to statistics of the Puerto Rico Vocational Rehabilitation Administration (PRVRA), the top 3 occupations where the people seeking their services worked were Sales and Related, Office and Administrative Support, and Food Preparation and Serving Related occupations.

**Table 27. Employment outcomes of vocational rehabilitation services by major occupational group, PY 2015**

SOC Code	Occupational major group	Total employment	As % of all customers
41	Sales and related	315	10.7%
43	Office and administrative support	308	10.5%
35	Food preparation and serving related	297	10.1%
29	Healthcare practitioners and technical	255	8.7%
51	Production	252	8.6%
37	Building and grounds cleaning and maintenance	198	6.7%
39	Personal care and service	186	6.3%
25	Education, training and library	152	5.2%



49	Installation, maintenance and repair	125	4.2%
17	Architecture and engineering	111	3.8%
31	Healthcare support	107	3.6%
53	Transportation and material moving	101	3.4%
27	Art, design, entertainment, sports and media	85	2.9%
11	Management	83	2.8%
33	Protective services	71	2.4%
47	Construction and extraction	53	1.8%
21	Community and social services	47	1.6%
13	Business and financial operations	46	1.6%
19	Life, physical and social sciences	45	1.5%
59	Homemaker	40	1.4%
15	Computer and mathematical	23	0.8%
45	Farming, fishing and forestry	17	0.6%
23	Legal	13	0.4%
55	Military specific	13	0.4%
Total		<b>2,943</b>	100%

Source: PRVRA, Service statistics, PY2015. Might not add to 100% due to rounding.

According to ACS estimates from 2017, the share of employed population with a disability in Puerto Rico was 8.5%, which grew significantly from 7.8% in 2016.

The PRVRA service statistics confirm ACS estimates for population 16 and over for the jobseeker population in terms of distribution by type of disability.

**Table 28. Employment status by disability of population 16 and over, 2012-2017**

Status and Disability Type	2012	2013	2014	2015	2016	2017
Employed population with a disability	<b>8.6%</b>	<b>8.5%</b>	<b>8.6%</b>	<b>7.8%</b>	<b>7.8%</b>	<b>8.5%</b>
Hearing difficulty	17.0%	18.1%	17.8%	20.1%	16.7%	17.6%
Vision difficulty	30.8%	31.4%	33.2%	33.9%	36.7%	35.8%
Cognitive difficulty	31.2%	30.9%	29.3%	30.1%	27.1%	28.3%
Ambulatory difficulty	43.4%	39.8%	41.8%	44.5%	38.0%	39.5%
Self-care difficulty	7.6%	6.2%	8.9%	10.4%	8.2%	11.9%
Independent living difficulty	12.8%	13.9%	16.2%	12.7%	11.4%	13.7%

Unemployed population with a disability	<b>11.4%</b>	<b>11.4%</b>	<b>11.1%</b>	<b>12.2%</b>	<b>12.8%</b>	<b>10.4%</b>
Hearing difficulty	14.2%	13.0%	13.8%	14.1%	10.6%	22.0%
Vision difficulty	28.6%	31.5%	32.6%	36.5%	30.2%	29.0%
Cognitive difficulty	46.0%	46.2%	43.0%	46.6%	43.3%	40.7%
Ambulatory difficulty	32.3%	37.3%	34.0%	29.7%	34.5%	31.4%
Self-care difficulty	6.4%	8.6%	9.5%	8.9%	9.3%	7.1%
Independent living difficulty	20.2%	16.6%	21.4%	21.0%	20.1%	13.7%
Population not in labor force with a disability	<b>30.3%</b>	<b>30.1%</b>	<b>30.4%</b>	<b>30.4%</b>	<b>29.7%</b>	<b>28.2%</b>
Hearing difficulty	4.2%	3.9%	4.1%	4.0%	3.7%	4.0%
Vision difficulty	7.8%	6.9%	7.7%	7.3%	7.5%	7.7%
Cognitive difficulty	16.3%	16.1%	16.0%	15.6%	14.5%	13.9%
Ambulatory difficulty	16.9%	16.5%	17.2%	17.0%	16.4%	15.5%
Self-care difficulty	6.6%	6.6%	7.0%	7.4%	6.8%	7.2%
Independent living difficulty	15.1%	15.2%	15.3%	15.1%	14.1%	13.5%

Source: U.S. Census Bureau, 2012-2017 American Community Survey.

### Older Individuals

As shown in the table below, population 55 to 64 dropped slightly (-2.3%) between 2016 and 2018, while the population 65 and over rose by more than 2.8%. According to ACS estimates, the labor force participation in Puerto Rico for persons 55 and older has stayed at approximately the same level during the past years; about half of that in the United States. Population aging poses significant challenges in all respects, including workforce development and regarding efforts aimed at jumpstarting the participation in labor force of the population.

### Ex-Offenders

According to the 2019's Inmate Population Profile completed by the PR Department of Correction and Rehabilitation (PDCR), as of September 2019, there were 7,663 inmates in the correctional facilities in Puerto Rico. Of this population, 7,400 or 97% were male and 263 or 3% were female.

Regarding the age distribution, the largest age group of the male inmate population was the 25 to 29 years age group with 1,412 inmates or 19% of total males. In the female inmate population case, the largest group was the 35 to 39 years age group with 67 inmates or 25% of total females.

As per their education and skills to participate in the labor market, 43% of male and 34% of female inmate population had less than high school diploma. About 3% of male and 0.8% of female inmate population could not read. On the other hand, most of them (57% of males and 66% of females), had high school diploma or more education. As a matter of fact, 70% of male and 53% of female inmates had a job before entering the correctional system. The principal sectors in which male inmates worked before incarceration were Construction, Cleaning and Maintenance, and Commerce with 32%, 14% and 12%, respectively. In the case of female inmates, the principal sectors were commerce, cleaning and maintenance and food related with 22%, 14%, and 12%, respectively.

**Table 29. Sociodemographic characteristics of the inmate population**

<b>Characteristics</b>	<b>Male</b>	<b>(% of total count)</b>	<b>Female</b>	<b>(% of total count)</b>
Total	<b>7,400</b>	<b>97%</b>	<b>263</b>	<b>3%</b>
Age				
18-24	599	8%	14	5%
25-29	1,412	19%	57	22%
30-34	1,395	19%	58	22%
35-39	1,315	18%	67	25%
40-44	1,021	14%	24	9%
45-49	704	10%	18	7%
50-59	676	9%	18	7%
60 en adelante	275	4%	7	3%
Could not read	238	3%	2	0.8%
Could not write	283	4%	5	1.9%
Educational Attainment				
K-6th grade	623	8%	10	4%
7th-11th grade	2,538	34%	80	30%
High-school diploma or GDE	3,256	44%	97	37%
Technical studies	361	5%	26	10%
Some college or Associate degree	462	6%	40	15%
Bachelor's degree	108	1%	8	3%

Characteristics	Male	(% of total count)	Female	(% of total count)
Master's degree or higher	27	0%	2	1%
Employment status prior to reclusion				
Employed	5,199	70%	140	53%
Did not participate in the labor force*	2,169	29%	121	46%
Field of previous work experience				
Construction	1,836	32%	2	2%
Cleaning and maintenance	821	14%	16	14%
Commerce	666	12%	25	22%
Auto repair and maintenance	560	10%	3	3%
Barber and hairdresser	344	6%	8	7%
Food related	293	5%	13	12%
Agriculture	197	3%	4	4%
Security services	43	1%	5	4%
Technical services	178	3%	2	2%
Art and entertainment	34	1%	0	0%
Health related	42	1%	8	7%
Professional	17	0%	3	3%
Communications and public relations	11	0%	0	0%
Education related	16	0%	0	0%
Sports related	23	0%	2	2%
Secretarial and administrative support	54	1%	8	7%
Caretaker	2	0%	6	5%
Related to warehouses	81	1%	1	1%
Other	499	9%	6	5%

Source: Department of Correction and Rehabilitation. Perfil de población confinada 2019.

### Homeless individuals, or homeless children and youths

In 2017 there were 3,501 homeless persons in Puerto Rico. "Chronically Homeless" individuals were the largest group with 1,085 persons or almost one third of total homeless.

Table 30. Homeless persons by category, 2011-2017

	Total	With Families	Veterans	Chronically Homeless
2011	2,900	554	137	3,564
2013	4,128	658	82	2,130
2015	4,518	589	164	1,756
2017	3,501	1,047	140	1,085

Source: HUD, Annual Homeless Assessment Report to Congress, 2007-2017.

### Individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families (TANF) program

In 2018, a total of 6,048 families received assistance through TANF, of which 98.8% received medical assistance, 99.2% nutritional assistance with a monthly pay of \$355.

Table 31. TANF families by public assistance program 2015, 2018

	Total Families	Medical Assistance	SNAP (%)	SNAP Monthly Avg (\$)
<b>FY 2015</b>	10,838	99.9%	99.4%	271
<b>FY 2018</b>	6,048	98.8%	99.2%	355

Source: Office of Family Assistance. Characteristics and Financial Circumstances of TANF Recipients.

In FY 2018, 5,560 adults received assistance through TANF, of which 14.3% had less than 10<sup>th</sup> grade of education, 10.1% reached 10 – 11<sup>th</sup> grade, 56.5% completed 12<sup>th</sup> grade and 19.1% had more than high school education.

Table 32. TANF adult recipients by educational attainment 2015, 2018

	Adult Recipients	Less than 10 <sup>th</sup> grade	10 - 11 <sup>th</sup> grade	12 <sup>th</sup> grade	More than high school
<b>FY 2015</b>	10,149	16.9%	12.6%	57.8%	12.7%
<b>FY 2018</b>	5,569	14.3%	10.1%	56.5%	19.1%

Source: Office of Family Assistance. Characteristics and Financial Circumstances of TANF Recipients.

As highlighted before, 40.9% of all families live below poverty level. From these, 59.1% are female-headed families, and 45% of those have children under 18 years old. This factor causes it to be more difficult to connect TANF families to the job market.

Table 33. TANF Adult Recipients by Employment Status 2015, 2018

	Total Adult Recipients	Employed (%)	Male Recipients	Employed (%)	Female Recipients	Employed (%)
<b>FY 2015</b>	10,149	2.5%	716	1.3%	9,433	2.6%
<b>FY 2018</b>	5,569	1.4%	236	0.0%	5,333	1.5%

Source: Office of Family Assistance. Characteristics and Financial Circumstances of TANF Recipients.

As shown below, the most common reasons of TANF closures in 2018 were voluntary closure with 37.9%, employment with 12.7%, and reaching the federal time limit with 8.6% of all cases.

Table 34. TANF Closed-Case Families by Reason for Closure 2015, 2018

	Total Families	Employment	Federal Time Limit	Other Sanction	Excess Income or Resources	Voluntary Closure	Other
<b>FY 2015</b>	5,382	24.8%	2.9%	10.3%	7.5%	34.9%	19.6%
<b>FY 2018</b>	3,011	12.7%	8.6%	8.7%	7.7%	37.9%	24.4%

Source: Office of Family Assistance. Characteristics and Financial Circumstances of TANF Recipients.

### Single parents (including single pregnant women)

According to 2017 ACS data, there were 371,328 single parent families or 44% of total families. This figure included 80,278 single-male headed families and 291,050 single-female families.

The percentage of persons unemployed for 15 weeks or more reached a peak of 4.9% in 2011, after the full impact of the Great Recession. Since that year, this percentage has been decreasing to 1.6% in 2019.

Table 35. Alternative measure of labor underutilization U-1, persons unemployed 15 weeks or longer, as a percent of the civilian labor force, 2007-2019

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
As % of labor force	1.7	2.4	3.9	4.5	4.9	4.0	3.8	3.7	3.3	2.7	2.4	1.9	1.6

Note: The figure was calculated by taking the average of each trimester.

Source: Puerto Rico Department of Labor and Human Resources.

## Other groups: Veterans

In 2017, there were 83,641 veterans in Puerto Rico. Most were in the 75 years and over age group with 33% of total. The second most import age group of veterans was 65 to 74 years. There were 33,682 veterans of working age (18 to 64 years), representing 40% of total veterans.

**Table 36. Veteran population by age, September 2014**

Total	18 to 34 years	35 to 54 years	55 to 64 years	65 to 74 years	75 years and over
<b>83,641</b>	4,466	13,950	15,266	21,959	28,000
<b>100%</b>	5%	17%	18%	26%	33%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

### ii. Labor Market Trends.

Provide an analysis of key labor market trends, including across existing industries and occupations.

The labor market in Puerto Rico has the following trends:

- Reduction in the participation rate.
- High and protracted unemployment.
- An ageing of the labor force.
- Transitioning from manufacturing to services industries.
- Government downsizing.
- High outmigration of people in working age.
- A highly educated labor force.

## Demographics

The demographic pressures on the labor force, including aging, population decrease, and a historic low natural growth rate are challenged by the increased outflow of migrants to the states, which spiked from 28,253 net out-migrants in 2010 to 112,551 in 2018. Outmigration was bolstered by the impact of hurricanes Irma and Maria in September 2017.

**Table 37. Net outmigration to States, 2007-2014**

Year	Out	In	Net
2010	-59,985.0	31,732.0	-28,253.0
2011	-76,218.0	22,649.0	-53,569.0

Year	Out	In	Net
2012	-74,500.0	20,044.0	-54,456.0
2013	-73,846.0	24,652.0	-49,194.0
2014	-83,844.0	19,771.0	-64,073.0
2015	-89,000.0	24,762.0	-64,238.0
2016	-88,676.0	21,196.0	-67,480.0
2017	-97,488.0	20,167.0	-77,321.0
2018	-133,451.0	20,900.0	-112,551.0

Source: U.S. Census Bureau, 2010-2018, American Community Survey

As shown in table below, the percentage of outmigrants with post-secondary education grew from 40% in 2010 to 48% in 2013, and 56% in 2017. The median age of out-migrants increased from 28.1 in 2010 to 30.1 years in 2017. The numbers showed a relative shifting from blue-collar emigrants to more white-collar emigrants in recent years.

**Table 38. Profile of out-migrant to other States, 2010, 2013, 2017**

Year	With high school or less	With post-secondary education	Median age	Under 35 years old
2010	60%	40%	28.1	-62%
2013	52%	48%	28.5	-62%
2017	44%	56%	30.1	-60%

Source: PP Institute of Statistics. Migrant profile report (2010,2015,2017).

## Government Downsizing

From 2009 to 2019, the public sector decreased by 29.9% with an average drop of 3.5% per year. As a result, the share of government in total employment has gone from 30% to 23.2% in the last decade. The effects of government downsizing policies from 2009 to 2015 ensued a loss of 56,000 jobs with more than 20,000 of those being lost in 2010 alone.

State employment holds the largest portion within the public sector with an average share of 70% during this period. Nonetheless, it has decreased 35.9% (2009-2019) or -4.3% on average per year. Likewise, local government employment has decreased 20.1% during this period; however, federal jobs have increased by 11.4%.



Table 39. Government employment, 2009-2019

	Total Employment (000s)	Govt. (000s)	Govt. (as % of total)	Fed. (000s)	Fed. (as % of total)	State (000s)	State (as % of total)	Local (000s)	Local (as % of total)
2009	965.3	289.3	30.0%	15.0	1.6%	209.8	21.7%	64.5	6.7%
2010	931.6	267.6	28.7%	17.0	1.8%	190.0	20.4%	60.6	6.5%
2011	924.2	258.8	28.0%	14.6	1.6%	184.7	20.0%	59.5	6.4%
2012	940.1	259.2	27.6%	14.3	1.5%	183.5	19.5%	61.4	6.5%
2013	926.0	244.7	26.4%	14.0	1.5%	173.7	18.8%	57.0	6.2%
2014	909.8	234.7	25.8%	13.9	1.5%	166.0	18.2%	54.9	6.0%
2015	901.3	231.3	25.7%	14.2	1.6%	162.0	18.0%	55.1	6.1%
2016	894.0	227.5	25.4%	14.4	1.6%	157.3	17.6%	55.8	6.2%
2017	870.9	217.3	24.9%	14.8	1.7%	149.6	17.2%	52.9	6.1%
2018	860.9	207.3	24.1%	16.4	1.9%	141.2	16.4%	49.7	5.8%
2019	873.6	202.6	23.2%	16.7	1.9%	134.5	15.4%	51.5	5.9%

## Occupations

In terms of occupations, the largest number of jobs added between 2014 and 2018 were Assemblers and Fabricators with 5,110 jobs (see table 39). Moreover, the occupation with the largest expansion, among those that added the most jobs, was Middle School teachers with a percentage gain of 393% during this period. On the other hand, the three occupations with the greatest losses in employment were Office and Administrative Support Occupations, Sales and Related Occupations, and Retail Salespersons. This is consistent with the increase of 11.2% of unemployment insurance claimants that worked in Retail Trade between 2014 and 2018.

The table below shows that the total number of individuals claiming unemployment insurance has fallen by 8,197 (32.7%). This, in part, may be due to the increased changes in migration patterns. Moreover, there has been a decreasing trend in males that has shifted to females, which now make up more than half of unemployed insurance claimants. From 2014 to 2020, the bulk of unemployment claimants has remained in the 25-54 age groups, comprising 63.4% of total cohorts in January of 2020.

When assessing occupation groups, Accommodation and Food Services saw an increase of 1,401 individuals claiming unemployment insurance from 2014 to 2018 followed by Health and Social Assistance and Retail Trade. From 2018 to 2020, many occupations saw a substantial decrease in claims; however, Educational Services (115%), Administration and Support/Waste Management and Remedial Services (38%),

Transportation Warehousing (101%), and Manufacturing (15%) were among those that saw an uptick in claims.

**Table 40. Characteristics of Unemployment Insurance Claimants**

	Jan-20	Percent	Jan-18	Percent	Jan-14	Percent
Total	<b>16,870</b>		<b>23,155</b>		<b>25,067</b>	
Male	7,315	43.40%	10,304	44.50%	14,317	57.10%
Female	9,555	56.60%	12,851	55.50%	10,750	42.90%
Years of Age	<b>16,870</b>		<b>23,155</b>		<b>25,067</b>	
Younger than 22	453	2.30%	407	1.50%	960	3.00%
22-24	1,033	5.10%	1,041	3.90%	2,188	6.90%
25-34	4,551	22.60%	5,469	20.70%	7,875	24.90%
35-44	4,484	22.30%	6,018	22.70%	6,306	19.90%
45-54	3,726	18.50%	5,560	21.00%	4,714	14.90%
55-59	1,280	6.40%	2,204	8.30%	1,557	4.90%
60-64	819	4.10%	1,381	5.20%	895	2.80%
65 and older	505	2.50%	1,050	4.00%	540	1.70%
Information Not Available	19	0.10%	25	0.10%	32	0.10%
Industry	<b>16,870</b>		<b>23,155</b>		<b>25,067</b>	
Agriculture/Forestry/Fishing and Hunting	315	1.80%	806	3.40%	603	2.30%
Mining	5	0.00%	14	0.10%	26	0.10%
Utilities	9	0.10%	10	0.00%	10	0.00%
Construction	974	5.70%	830	3.50%	3,182	12.40%
Manufacturing	1,933	11.20%	1,685	7.00%	3,184	12.40%
Wholesale Trade	323	1.90%	517	2.20%	621	2.40%
Retail Trade	1,478	8.60%	2,722	11.40%	2,206	8.60%
Transportation and Warehousing	493	2.90%	245	1.00%	325	1.30%
Information	148	0.90%	352	1.50%	324	1.30%
Finance and Insurance	332	1.90%	235	1.00%	514	2.00%
Real Estate, Rental and Leasing	171	1.00%	262	1.10%	260	1.00%
Professional/Scientific/Technical Services	380	2.20%	910	3.80%	737	2.90%
Management of Companies and Enterprises	22	0.10%	53	0.20%	38	0.10%
Administration and Support/Waste Management and Remedial Services	2,709	15.80%	1,969	8.20%	5,303	20.70%
Educational Services	3,531	20.50%	1,639	6.80%	1,540	6.00%
Healthcare and Social Assistance	1,056	6.10%	2,458	10.30%	1,545	6.00%
Arts, Entertainment and Recreation	52	0.30%	320	1.30%	72	0.30%
Accommodation and Food Services	1,010	5.90%	2,640	11.00%	1,239	4.80%
Other Services (except Public Administration)	187	1.10%	477	2.00%	299	1.20%
Public Administration	676	3.90%	2,246	9.40%	1,808	7.00%
Information Not Available	1,066	6.20%	2,765	11.50%	1,231	4.80%

Source: ETA, Characteristics of the Unemployment Insurance Claimants, June 2014, 2018, and 2020.

### iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

According to estimates from the U.S. Census Bureau, there are around 2.39 million individuals over the age of 25 in Puerto Rico, of which 46.1% are males and 53.8% are females. From these, 52.9% have a high school degree or less while the remaining 47.1% have some college/associate degree, bachelor's degree or higher. Approximately a third of the male population has achieved 12<sup>th</sup> grade (no diploma) or less. However, almost 30% of women have completed a bachelor's degree or more compared to around 20% of men.

**Table 41. Percentage of population 25 years and over by sex and educational attainment, 2017**

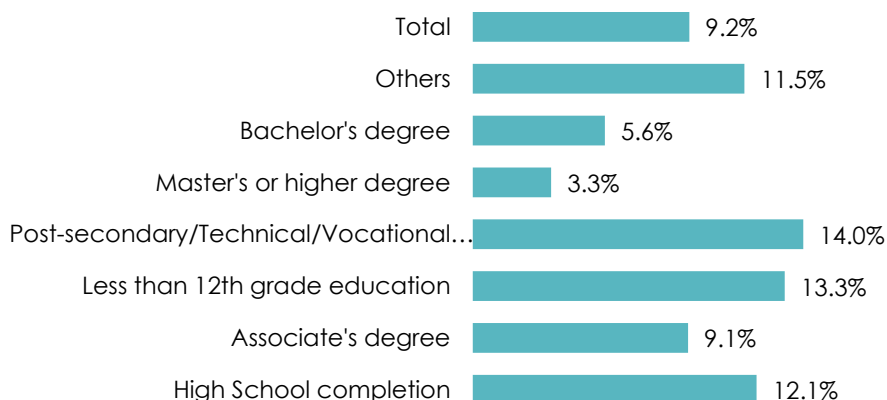
Sex	Population 25 years and over	Less than HS graduate (%)	HS graduate or GDE (%)	Some college or associate's degree (%)	Bachelor's degree or higher (%)
Male	1,102,958	27.7%	30.4%	21.7%	20.4%
Female	1,287,833	23.3%	25.2%	22.7%	28.9%
Total	<b>2,390,791</b>	<b>25.3%</b>	<b>27.6%</b>	<b>22.2%</b>	<b>24.9%</b>

Source: ACS 5-year estimates, 2017.

By educational level, unemployment is concentrated among those with a post-secondary/technical/vocational preparation, while those with a bachelor's degree and higher have lower unemployment.

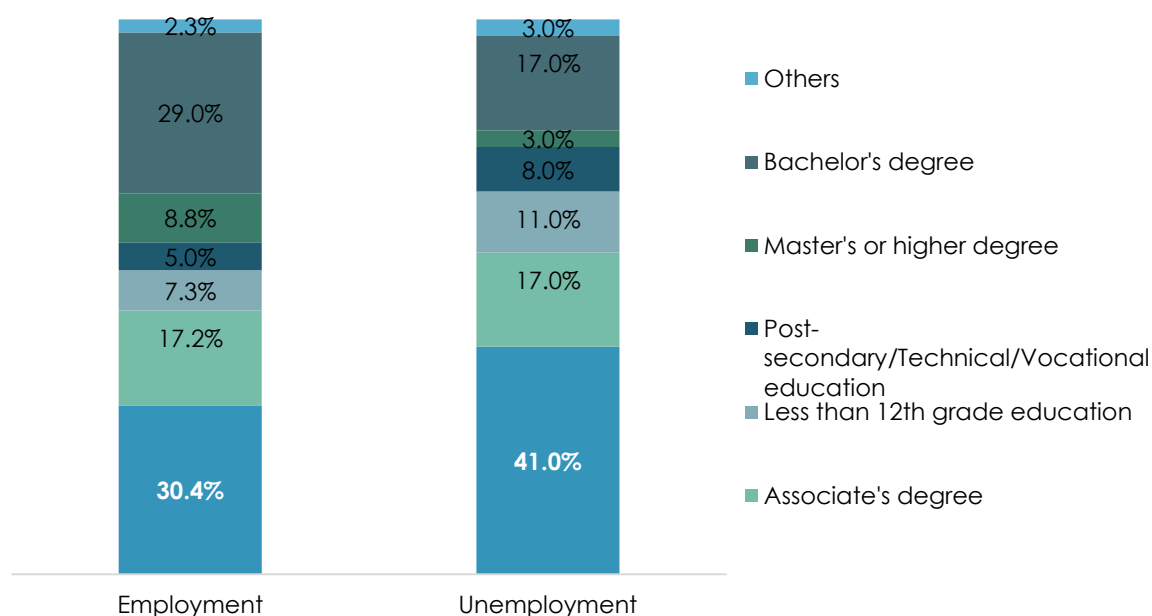
On the other hand, among those employed have a higher level of education. In other words, the higher the level of education, the lower the probabilities of being unemployed.

**Graph 11. Unemployment Rates by Educational Attainment, 2018**



Source: DLHR (2019). Empleo y Desempleo en Puerto Rico Promedio Año Natural (Anual).

Graph 12. Distribution of Employment and Unemployment by Educational Attainment, 2018



Source: DLHR (2019). Empleo y Desempleo en Puerto Rico Promedio Año Natural (Anual).

Slightly below a third of the population over 25 lives in the following regions: Caguas-Guayama (11.7%), San Juan (10.5%), and Manatí-Dorado (8.3%). The Noroeste region has the highest percentage of individuals over 25 who have less than a high school diploma with 32.3% while Sur Central has the highest population of high school graduates in all the regions with 34.9%. In addition, Carolina, with 26.7%, has the largest percentage of individuals who have some college or an associate degree and 35.5% of San Juan's population has a bachelor's degree or greater, the highest one in all regions.

Table 42. Percentage of population 25 years and over by local area and educational attainment, 2017

Local Area	Population 25 years and over	Less than HS graduate (%)	HS graduate or GDE (%)	Some college or associate's degree (%)	Bachelor's degree or higher (%)
Bayamón-Comerio	146,279	21.8%	24.9%	26.4%	26.9%
Caguas-Guayama	280,564	22.3%	28.6%	21.9%	27.1%
Carolina	113,117	16.7%	25.6%	26.7%	31.0%
Guaynabo-Toa Baja	188,637	19.5%	23.5%	24.0%	33.1%
La Montaña	81,236	29.0%	30.8%	21.4%	18.8%
Manatí-Dorado	197,903	30.0%	26.6%	23.2%	20.3%

Mayagüez-Las Marías	58,490	30.4%	29.5%	17.2%	22.8%
Noreste	154,155	25.7%	33.2%	21.4%	19.7%
Noroeste	179,789	32.3%	27.5%	20.1%	20.2%
Norte Central	193,624	29.5%	27.5%	22.4%	20.6%
Ponce	101,170	23.8%	30.3%	19.8%	26.1%
San Juan	251,574	20.4%	21.5%	22.6%	35.5%
Sur Central	108,638	25.3%	34.9%	18.8%	21.0%
Sureste	162,313	27.3%	28.6%	24.2%	19.9%
Suroeste	173,302	30.4%	29.9%	18.5%	21.2%
<b>Puerto Rico</b>	<b>2,390,791</b>	<b>25.3%</b>	<b>27.6%</b>	<b>22.2%</b>	<b>24.9%</b>

Source: ACS 5-year estimates, 2017.

The relationship between the progression in educational attainment and poverty status is telling in terms of gender. A significant improvement in poverty status is achieved by males from non-high school level to high school and successively when progressing onto postsecondary and higher education levels. For females, the leap comes only after higher education attainment when the drop-in poverty status magnifies in relation to just attaining post-secondary education below a bachelor's degree. Nevertheless, still at this level males fare better.

**Table 43. Poverty rate of population 25 years and over for whom poverty status is determined by sex and educational attainment, 2017**

<b>Sex</b>	<b>Population 25 years and over</b>	<b>Less than HS graduate (%)</b>	<b>HS graduate or GDE (%)</b>	<b>Some college or associate's degree (%)</b>	<b>Bachelor's degree or higher (%)</b>
<b>Male</b>	1,102,958	61.4%	41.0%	26.0%	11.9%
<b>Female</b>	1,287,833	63.8%	54.7%	41.6%	16.5%
<b>Total</b>	<b>2,390,791</b>	<b>62.6%</b>	<b>47.8%</b>	<b>34.6%</b>	<b>14.8%</b>

Source: ACS, 5-year estimates, 2017.

However, when assessing the estimates for median earnings by sex and education, one notes that men earn more than women in all categories by education. This is particularly true for higher education levels where women outnumber men. The salary difference between both genders for "graduate or professional degrees" is \$14,306 and \$7,057 for

“bachelor’s degree”. Furthermore, the earnings gap narrows as the education level decreases and vice versa.

**Table 44. Median earnings (\$) of population 25 years and over by sex and educational attainment, 2017**

Sex	Population 25 and over	Less than HS graduate	HS graduate or GDE	Some college or associate's degree	Bachelor's degree	Graduate degree
Female	18,435	8,563	11,967	15,740	22,384	31,424
Male	18,117	11,027	15,518	18,551	29,441	45,730
Total	<b>18,282</b>	<b>10,116</b>	<b>14,489</b>	<b>17,035</b>	<b>24,330</b>	<b>35,433</b>

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates.

#### iv. Skill Gaps

Describe apparent “skill gaps”.

It is undeniable that the Puerto Rico labor market faces many difficulties caused by internal and external factors. Low participation rate and high unemployment prove that labor supply and demand do not match adequately. The government of Puerto Rico has important strategic initiatives, including an aerospace cluster, science and technology clusters, international insurance center, international financial center, Ponce's Port of the Americas, and Act 20 for service exports, among others. Such initiatives will demand jobs in certain industries and occupations in the next years. These new jobs will require different education requirement and skills.

According to the PR Department of Labor projections. By year 2026, the occupations expected to grow will demand 28,411 new jobs. Almost 36% of these new jobs will require high school diploma or equivalent, 34% will require no formal education, and 15% will require a bachelor's degree.

**Table 45. Education requirement in growing occupations, 2016-2026**

Education required for entry	Projected employment increase (2016-2026)	%
High school diploma or equivalent	10,309	36%
No formal educational credential	9,601	34%
Bachelor's degree	4,315	15%
Postsecondary non-degree award	2,259	8%

Education required for entry	Projected employment increase (2016-2026)	%
Doctoral or professional degree	915	3%
Associate degree	755	3%
Master's degree	240	1%
Some college, no degree	47	0%
Grand Total	<b>28,441</b>	100%

Source: PRDOLHR, Long-Term Projections, 2016-2026

**Table 46. Top 30 occupations by projected increase and postsecondary skills, 2016-2026**

#	SOC Code	Occupation	Typical education needed for entry	Projected employment increase (2016-2026)
1	35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	No formal educational credential	3,510
2	33-9032	Security Guards	High school diploma or equivalent	1,902
3	37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	No formal educational credential	1,676
4	29-2052	Pharmacy Technicians	Postsecondary non-degree award	1,278
5	35-3031	Waiters and Waitresses	No formal educational credential	1,117
6	35-2014	Cooks, Restaurant	No formal educational credential	939
7	43-6013	Medical Secretaries	High school diploma or equivalent	789
8	43-5081	Stock Clerks and Order Fillers	High school diploma or equivalent	658
9	41-1011	First-Line Supervisors of Retail Sales Workers	High school diploma or equivalent	642
10	29-1141	Registered Nurses	Bachelor's degree	612
11	31-1011	Home Health Aides	High school diploma or equivalent	526

#	SOC Code	Occupation	Typical education needed for entry	Projected employment increase (2016-2026)
12	41-3021	Insurance Sales Agents	High school diploma or equivalent	494
13	11-9051	Food Service Managers	High school diploma or equivalent	478
14	39-9021	Personal Care Aides	High school diploma or equivalent	425
15	35-3022	Counter Attendants, Cafeteria, Food Concession, and Coffee Shop	No formal educational credential	379
16	11-3031	Financial Managers	Bachelor's degree	369
17	35-2021	Food Preparation Workers	No formal educational credential	364
18	53-3022	Bus Drivers, School or Special Client	High school diploma or equivalent	354
19	31-9091	Dental Assistants	Postsecondary non-degree award	346
20	11-9199	Managers, All Other	Bachelor's degree	327
21	43-3021	Billing and Posting Clerks	High school diploma or equivalent	327
22	11-1021	General and Operations Managers	Bachelor's degree	320
23	51-9199	Production Workers, All Other	High school diploma or equivalent	272
24	29-1051	Pharmacists	Doctoral or professional degree	270
25	13-1161	Market Research Analysts and Marketing Specialists	Bachelor's degree	263
26	35-1012	First-Line Supervisors of Food Preparation and Serving Workers	High school diploma or equivalent	249
27	43-4051	Customer Service Representatives	High school diploma or equivalent	249
28	41-9091	Door-to-Door Sales Workers, News and Street Vendors, and Related Workers	No formal educational credential	234



#	SOC Code	Occupation	Typical education needed for entry	Projected employment increase (2016-2026)
29	41-1012	First-Line Supervisors of Non-Retail Sales Workers	High school diploma or equivalent	228
30	29-2011	Medical and Clinical Laboratory Technologists	Bachelor's degree	215

Source: PRDOLHR, Long-Term Projections, 2016-2026

## (2) Workforce Development, Education and Training Activities Analysis.

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce and the employment needs of employers. This must include an analysis of -

### *(A) The State's Workforce Development Activities*

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

It is in the best interest of WIOA to offer training in areas that will have the greatest need of employees. Recognizing these areas will help guide WIOA's efforts in training their participants in profitable trades.

According to our analysis of the labor and education, programs where demand surpasses the supply are presented in the following table. The programs with the highest demand include General office occupations, Truck and Bus Driver, Receptionist, Customer Service Support, and Non-degree disciplines.

**Table 47. Comparison of Graduations versus Job Openings in Most Demanded Instructional Programs**

Instructional Program Description	CIP CODE	Annual Graduates	Total Employment 2018	Job Openings	Demand by Instructional Program
Other Non-degree disciplines	99.9999	-	328,103	36,091	36,091
General Office Occupations and Clerical Services	52.0408	55	23,512	2,318	2,263
Truck and Bus Driver/Commercial Vehicle Operator and Instructor	49.0205	-	15,914	1,683	1,683
Receptionist	52.0406	-	10,540	1,344	1,344

Executive Assistant/Executive Secretary	52.0402	219	13,627	1,282	1,063
Customer Service Support/Call Center/Teleservice Operation	52.0411	-	7,526	954	954
Accounting Technology/Technician and Bookkeeping	52.0302	51	9,370	999	948
Home Health Aide/Home Attendant	51.2602	63	7,298	958	895
Building/Property Maintenance	46.0401	19	9,180	913	893
Office Management and Supervision	52.0204	233	11,246	1,064	831
Administrative Assistant and Secretarial Science, General	52.0401	573	14,846	1,397	823
Sales, Distribution, and Marketing Operations, General	52.1801	6	7,305	740	734
Teacher Assistant/Aide	13.1501	235	9,565	928	693
Banking and Financial Support Services	52.0803	163	7,850	763	600
Criminalistics and Criminal Science	43.0111	102	10,485	675	573
Selling Skills and Sales Operations	52.1804	-	4,823	546	546
Operations Management and Supervision	52.0205	33	6,223	490	458
Retailing and Retail Operations	52.1803	-	3,278	433	433
Quality Control Technology/Technician	15.0702	11	3,518	387	376
Medical Office Management/Administration	51.0705	9	3,980	376	368
General Merchandising, Sales, and Related Marketing Operations, Other	52.1899	1	3,647	364	362
Finance, General	52.0801	278	7,936	627	348
Teacher Education, Multiple Levels	13.1206	111	6,970	459	348
Industrial Mechanics and Maintenance Technology	47.0303	26	3,493	350	324
Construction/Heavy Equipment/Earthmoving Equipment Operation	49.0202	-	3,168	317	317
Insurance	52.1701	2	3,493	296	294
Other Academic Programs		56,218	297,638	25,688	(30,530)
<b>Total</b>		<b>58,450</b>	<b>844,474</b>	<b>83,491</b>	<b>25,042</b>

Source: Estudios Técnicos, Inc.

The Non-degree disciplines are presented as the group with the highest demand mainly because they do not correspond with any instructional program. This group includes occupations that generally do not require a degree, such as retail salesperson, janitor, cashiers, and security guards.

Instructional programs related to administrative assistance and office aid predominate among the highest demanded. These programs are complementary between each other and respond to high turnovers in a large sector. In addition to being part of these

results, Office and Administrative Support occupations were projected to have the largest demand in the latest PR Long Term Occupational Employment projections.

Additional important programs with high demand are Home Health Aid and Customer Service Support. Both programs are in have been in demand in recent years. Given the aging population in Puerto Rico, home health aids are becoming an alternative for persons with preexisting conditions. They provide a service that is essential for patients that may have mobility issues and want to remain living on their own. On the other hand, customer service support offices, or call centers, have been steadily growing in the island. These call centers mainly require a bilingual training in their candidates and provide services to companies ranging from telecommunications providers and banks, to fine jewelry.

### **Methodology**

The Career demand in Puerto Rico was calculated with the combination of annual graduates, total employment, and job openings in each Instructional Program (CIPCODE). The separation rates were calculated by adding the projected growth with the labor force exits and occupational transfers and dividing by the total employment of that occupation. Using the separation rate obtained from the estimates we calculated the Job Openings by multiplying the separation rate with the Employment in that Instructional Program. Then the career demand by instructional program was calculated by subtracting the job openings with the annual graduates.

The estimates presented were prepared using data from the Bureau of Labor Statistics (BLS), National Center for Education Statistics (NCES), and Puerto Rico's Department of Labor and Human Resources (PRDLHR). The specific data sets used from each source were: BLS with the Occupational Employment Statistics (OES) survey, from the NCES we used Integrated Postsecondary Education Data System (IPEDS) data set, and from PRDLHR we use the Occupational Employment Projections 2016-2016.

The specific data used from the OES Survey were the Employment per Occupation in Puerto Rico. The Annual Average Graduates were obtained from the IPEDS data set from years 2011 to 2018. The Crosswalk used for converting from Occupations to Careers was made by BLS and NCES using the 2010 CIPCODES and 2010 SOC CODES. Finally, from the PRDLHR the annual job openings were used to calculate the attrition rates from each occupation.

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*(B) The Strengths and Weaknesses of Workforce Development Activities*

Provide an analysis of the strengths and weaknesses of the workforce development activities.

**Strengths**

- While it posed immediate organizational challenges, the reorganization mandated by Act 171-2014, which transferred the Workforce Development Program from the PRDOLHR to the PRDEDC, has facilitated the integration of workforce and economic development activities required under WIOA. Significant opportunities arise by sharing the PRDEDC's resources available through the following units: Federal Contracting Center, One-Stop entrepreneur support network managed by the Commerce and Exports Corporation, Office of Industrial Tax Incentives, Youth Development Program, EB-5 Government's Regional Center, among other.
- As discussed in the previous section, although there are still voids in the system, the extent and number of programs provide many accessible opportunities for jobseekers and employers alike to find services, subsidies and support.
- Important strides have been made regarding long-standing problems that affected the public secondary education system, especially in measuring dropout rates and increased compliance with IDEA indicators. Also, the fact that the public education system is managed as an integrated statewide LEA works towards facilitating policy and program implementation, data integration and the measurement of outcomes.
- The size of the population served and the impact of transfer payments on the economic conditions of those enrolled on sizable federal assistance programs (NAP, HUD, among other) that include a workforce component, represent an opportunity to increase education, training and work experience for a high number of individuals.
- Core programs are supported by the availability of many training and service providers and qualified personnel, especially to provide services to target populations, including persons with disabilities.

**Weaknesses**

- The Government has overtly relied on non-competitive formula funds, thus missing on opportunities to strengthen the workforce system.
- A participant data management system in compliance with the Participant Record Individual Layout (PIRL) is still in the implementation phase at the

American Job Centers. This situation has put the DEDC in the position of requesting flexibility from DOL to submit the performance reports from PY 2018 onwards, on April 15, 2020. No efficiency has been demonstrated in the performance levels of the local workforce areas. The reorganization of the local workforce areas in Puerto Rico is under consideration.

- Due to the fact that PR has not been able to submit performance reports for the past few years, many decisions about system reorganization have not yet been made
- A silo-approach in managing government programs might have led to a diminish ability for leveraging program opportunities. More lateral redirecting among programs must be enabled through the appropriate structuring and maintenance of MOU's to strengthen coordination between core and required programs, local boards and operators in order to maximize resources and exchange referrals.
- The silo-approach might have also led to piecemeal communication and marketing of the services being offered throughout the workforce system to potential businesses customers and jobseekers alike, particularly when it comes to serving individuals facing barriers to employment.
- Efforts to braid and mutually leverage funding streams must be strengthened, which involves enhancing the advisory function and the provision of accurate, prompt and complete data to policy and lawmakers alike.
- Information products are needed to assess specific aspects of the workforce system including disaggregated data to ascertain services to individuals facing barriers to employment; real-time supply and demand dynamics in the labor market; or information to characterize underemployment, self-employment and the impact of the informal sector on the labor market. A data integration roadmap for the entire system is critical.
- Policies must be devised to tackle gender-skewed outcomes in post-secondary education and the labor market.
- The fiscal impairment of the public sector as a major employer and provider of funding for workforce activities poses a significant challenge to the effectiveness and performance of the entire system.

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*(C) State Workforce Development Capacity*

Provide an analysis of the capacity of State entities to provide the workforce development activities.

Puerto Rico has the capacity to provide the services required for workforce development, as is required by WIOA.

Puerto Rico has one of the highest university densities in the world. The island's gross enrollment ratio in post-secondary institution (84%) is on top of 97% of the countries in the world, according to the World Bank.

However, since 2014 the post-secondary enrollment, in absolute numbers, has been decreasing, due to young population decline. This reduction has left institutions with underutilized facilities that are still furnished to provide traditional educational services. Specifically, these institutions, given the appropriate resources, have the physical equipment and campus area to provide training for at least 32,000 students. This amount results from the difference between the total enrollment in post-secondary institutions from 2014 and 2018 which are the year with the highest recent enrollment and the most recent year, respectively.

**Table 48. Post-secondary Institution Enrollment**

<b>Year</b>	<b>Post-secondary Institution Enrollment</b>
2014	260,492
2018	228,030
Vacant spaces	32,462

Source: IPEDS Data (2020)

In addition to the unused area in post-secondary institutions, the Public Building Authority (AEP) has vacant space available under its management. According to the latest available information, the AEP oversees more than 600 buildings with an approximate rentable area of 31.3 million square feet. Out of these 600 buildings, more than 200 are vacant grade school campuses. These schools can also be used to provide training in local communities. Using these vacant schools can increase WIOA's impact in harder to reach communities. Most of the programs' clientele have low mobility and can benefit from receiving training at more locally accessible facilities.

## (A) STATE STRATEGIC VISION AND GOALS

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

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### (1) Vision

Describe the State's strategic vision for its workforce development system.

Puerto Rico's workforce development system and its network of American Job Centers, succeed at being the service of choice to meet the needs of industries, businesses, employers and job seekers, and at expanding access to education, training and employment opportunities for adults, youth, dislocated workers, people with disabilities and individuals facing barriers to employment, thus contributing to further our economic development.

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### (2) Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities.

Puerto Rico's workforce development system has developed six goals to achieve the state's vision for workforce system as part of its strategic plan, each of which will employ several strategies. These goals are defined at the workforce system level and address both (a) preparation and education needed to develop an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other population and (b) the goals for meeting the skilled workforce needs of employers.

1. Develop and efficient partnership with employers, the educational system, workforce development partners, and community-based organizations to deliver a platform that will prepare a skilled workforce for existing and new employers.
2. Increase awareness, participation and utilization of the workforce development system by employers and job seekers
3. Facilitating a framework for planning, developing, and governing a job-driven system by employers and job seekers.
4. Maintain the American Job Center system physically and programmatically accessible throughout, for both job seekers and employers to enhance service delivery and meet their occupational education and employment needs.
5. Enhance performance through improved data integration, enhanced outcome metrics, system access, alignment, integration and modernization, across the workforce development system, including required and non-required partners.

6. Prepare workers in Puerto Rico to succeed in a highly competitive labor market by increasing their skills and educational attainment.

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### (3) Performance Goals

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

Employment Rate – 2<sup>nd</sup> Quarter After Exit: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program. For Youth, the indicator is the percentage of participants in education or training activities, or unsubsidized employment during the second quarter after exit.

Employment Rate – 4<sup>th</sup> Quarter After Exit: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program. For Youth, the indicator is the percentage of participants in education or training activities, or unsubsidized employment during the fourth quarter after exit.

Median Earnings – 2<sup>nd</sup> Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.

Credential Attainment: The percentage of participants who obtained a recognized post-secondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year of exit from the program.

Measurable Skill Gains: The percentage of 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, which are defined as documented academic, technical, occupational, or other forms of progress toward such a credential or employment.

Effectiveness in Serving Employers: Measures the Puerto Rico workforce systems effectiveness in serving employers by assessing the employee retention, employer penetration and repeat business customer rates.

As show, in the tables below provide the anticipated levels of performance for Title I, Title II, Title III and Title IV programs. At this time, program year goals for PY 2020 and PY 2021 have not yet been negotiated.



Table 49. Performance Goals for the Title I – Adult Program

	Title I - Adult Program			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	71%	79.9%	TBN	TBN
Employment (Fourth Quarter after Exit)	49%	49%	TBN	TBN
Median Earnings (Second Quarter after Exit)	\$2,880	\$3,510	TBN	TBN
Credential Attainment Rate	68%	68%	TBN	TBN
Measurable Skills Gains	Pre-stablish	24%	TBN	TBN

Table 50. Performance Goals for the Title I – Dislocated Worker Program

	Title I - Dislocated Worker Program			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	72%	71.5%	TBN	TBN
Employment (Fourth Quarter after Exit)	51%	51%	TBN	TBN
Median Earnings (Second Quarter after Exit)	\$3,444	\$7,012	TBN	TBN
Credential Attainment Rate	72%	72%	TBN	TBN
Measurable Skills Gains	Pre-stablish	16.5%	TBN	TBN

Table 51. Performance Goals for the Title I – Youth Program

	Title I - Youth Program			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	50%	70.6%	TBN	TBN
Employment (Fourth Quarter after Exit)	53%	53%	TBN	TBN
Median Earnings (Second Quarter after Exit)	Pre-stablish	\$3,185	TBN	TBN
Credential Attainment Rate	47%	47%	TBN	TBN
Measurable Skills Gains	Pre-stablish	29.1%	TBN	TBN

Table 52. Performance Goals for the Title II – Adult Education Program

	Title II - Adult Education Program			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	11.70%	11.70%	12.0%	12.0%
Employment (Fourth Quarter after Exit)	16.7%	16.7%	17.0%	17.0%
Median Earnings (Second Quarter after Exit)	\$3,301.00	\$3,301.00	\$3,301.00	\$3,301.00
Credential Attainment Rate	13.60%	13.60%	14%	14%
Measurable Skills Gains	60.2%	60.2%	60.8%	60.8%

Table 53. Performance Goals for the Title III – Wagner-Peyser Program

	Title III - Wagner-Peyser Program			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	59.5	59.5	59.5	59.5
Employment (Fourth Quarter after Exit)	59.5	59.5	59.5	59.5
Median Earnings (Second Quarter after Exit)	\$5,300	\$5,300	\$5,300	\$5,300

According to TEGL 10-19, the states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY2021. The indicator for this performance goal is going to be discussed between core partners before FY2020.

Table 54. Performance Goals for Effectiveness in Serving Employers

	Effectiveness in Serving Employers			
	Program Year 2020		Program Year 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Retention with Same Employer				
Repeat Business Customer Rate				
Employer Penetration Rate				

#### (4) Assessment

The PRDEDC is responsible for evaluating the effectiveness of the state's workforce development system. The State's performance report is in accordance with the Sec. 116(d)(2) of WIOA. Performance reporting will comply with the requirements set forth in 20 CFR Sec. 677.160 of the proposed rule including, as might be applicable to each core program:

- A state performance report on program levels achieved with respect to number of participants served;
- Total number of participants who exited each of the core programs, including disaggregated counts of those who participated in and exited a core program by individuals with barriers to employment;
- Demographics;
- Total number of participants and program exiters who received career and training services for the most recent program year and the three preceding program years;
- Levels achieved for the primary indicators for career and training services for the most recent program year and the 3 preceding program years;
- Percentage of participants in a program who obtained unsubsidized employment related to the training received through Title I-B programs;
- Amount of funds spent on each type of career and training service for the most recent program year and the 3 preceding program years;
- Average cost per participant for those participants who received career and training services, respectively, during the most recent program year and the 3 preceding program years;
- Percentage of a State's annual allotment spent on administrative costs; and
- Any other information that facilitates comparisons of programs with programs in other States.

The State Board and core programs will enforce the incorporation of assessment protocols leading to improvement through the selection and certification processes of local boards, operators and providers. Measurement mechanisms will be devised to account for outcomes resulting from the implementation of sector strategies and career pathways.

**(C) STATE STRATEGY**

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

As shown in table 54, the strategic plan of the Puerto Rico workforce system establishes the strategies necessary for achieving each of the five goals proposed in the strategic plan. The strategies are focused on the following areas: economic development, skills and educational attainment, innovation and governance, service integration and system alignment.

**Table 55. Alignment of goals with the strategic plan of P.R. workforce system**

<b>P.R. Workforce Development Program</b>	<b>State's Strategies:</b>			
<b>Goal 1: Partnership with Workforce System</b>	a. Expand employer partnerships through the support of industry engagement.	b. Identify and promote best practices (private and public) for developing and sustaining partnerships.	c. Improve communication/participation between education entities, local and state boards, government agencies, community-based organizations, and employers.	d. Increase the utilization of Registered Apprenticeship programs as viable talent development opportunities.
	e. Increase connections with employers and Vocational Rehabilitation agencies to provide	f. Partner with K-12 education, higher education, career and technical education, and adult education to provide consistent rules	g. Expand small business participation.	

P.R. Workforce Development Program	State's Strategies:			
	support and employment for youth and adults with disabilities.	and eliminate barriers to implementing training programs around the State.		
<p><b>Goal 2:</b>  <b>Increase participation of the Workforce System</b></p>	<p>a. Change employer and jobseeker perceptions of the workforce development system.</p>	<p>b. Develop an image-building outreach campaign that educates citizens about the services and the career development opportunities available in the State.</p>	<p>c. Utilize technology, including social media and search engine optimization, to better connect jobseekers and employers with the talent development system in Puerto Rico.</p>	<p>d. Cross train the AJCs staff including partners. Train staff who serve employers in sales, service, and skills needed to improve service to business.</p>
<p><b>Goal 3:</b>  <b>Framework for a job-driven system</b></p>	<p>a. Conduct regular research on trends and changes in the employment industry.</p>	<p>b. Provide training and capacity building to stakeholders focusing on the sector strategies implementation framework, effective industry analysis, employer engagement, partnership building, and design of career pathways and industry-relevant training programs, among other topics.</p>	<p>c. Develop metrics and required evaluation tools, reports and dissemination mechanisms to track outcomes for regional sector strategies and career pathways.</p>	<p>d. Convene a working group integrated by representatives of key existing and emerging industries, leadership from public systems such as workforce, higher education, economic development and employment support services, and policymakers to assist the State Board in developing support for sector</p>

P.R. Workforce Development Program	State's Strategies:			
<p><b>Goal 3: Framework for a job-driven system</b></p>	<p>e. Directly engage industry associations and individual companies with a large presence in Puerto Rico that might have an interest in investing in sector strategies to work directly with regional and local partnerships, including devising relevant data and labor market information products.</p>	<p>f. Identify opportunities to further academic research on conditions, approaches and prospects of the workforce development system.</p>	<p>g. Adopt a common framework to advance the adoption of regional plans by the local boards, program leaders, and elected officials that optimizes program integration and supports the implementation of sector strategies and career pathways.</p>	<p>strategies and career pathways.</p>
	<p><b>Goal 4: American Job Centers</b></p>	<p>a. Develop an integrated data system that will enable the sharing of information between partner agencies to more</p>		<p>b. Promote training that leads to industry recognized credentials and certification.</p>

P.R. Workforce Development Program	State's Strategies:			
<p><b>Goal 4: American Job Centers</b></p>	<p>efficiently service both employers and jobseekers.</p>			
	<p>e. Develop a common business outreach strategy with a common message that will be utilized by all workforce system partners.</p>	<p>f. Direct the State entities to acknowledge the American Job Center network as the main option to access comprehensive workforce development services.</p>	<p>g. Develop a uniform website for all local areas in Puerto Rico.</p>	<p>h. o Create a common workforce system identity, branding and messaging that lend support in marketing the system to those customers that ordinarily use the system, as well as to atypical customers like the highly-skilled job seeker, thus reinforcing the system's ability to attract a wider array of employers.</p>
	<p>i. Establish a dedicated business service to tend the specific needs of SMBs/SMEs and promote the use of One Stop facilities and/or staff to employers who might need it for</p>	<p>j. Coordinate marketing strategies so that the community can know about the program's services.</p>	<p>k. Identify other providers for areas were services are not available.</p>	



P.R. Workforce Development Program	State's Strategies:			
	prescreening, interviewing or other allowable activities.			
<p><b>Goal 5: Enhance performance through improved data integration, system access, alignment and modernization</b></p>	a. Assess the efficiency of the workforce development system.	b. Share labor market data across workforce partners to ensure the same data informs multiple partners on training decisions and encourage further dissemination of this information to uncover other areas where it might be useful.	c. Align performance and financial reporting systems locally and statewide to better allocate funding, improve accountability, and address systemic issues	d. Enhance customer service by creating common standards and systems across all workforce entities and reducing regulatory barriers.
	e. Develop effective mechanisms to communicate and share performance information to System stakeholders to be used for continuous improvement.	f. Create interagency agreements with required and non-required partners to promote co-enrollment, align workforce development activities and improve data sharing.	g. Measure and report on the effectiveness of the workforce development system including the usage and quality of services.	h. Ensure all elements of the System have built-in feedback mechanisms, such as surveys and roundtables.
	i. Monitor progress in, and partner with, other states to share resources in creating the most impactful programs			

P.R. Workforce Development Program	State's Strategies:			
<p><b>Goal 6: Increasing Skills and Education Attainment</b></p>	<p>a. Prioritize services and coordination across core and partner programs to expand education, work experience and employment outcomes for out-of-school youth.</p>	<p>b. Actively promote pre-employment transition services to youth with disabilities.</p>	<p>c. Expand early exposure of in-school youth to the range of career and higher education opportunities available through the workforce system.</p>	<p>d. Continue providing the College Board exam free of charge to all students enrolled in the public system taking it in 11th and 12th grades.</p>
	<p>e. Access to career information that will help to the participant to identify occupation and jobs that are growing in their area and the list of available trainings that can prepare the participant for those jobs.</p>	<p>f. 6. Coordinate with the PRDE's State Board for Career and Technical Education, the PRDOLHR and the industry, the effective delivery of occupational education for high-demand, highly skilled and/or technologically advanced occupations</p>	<p>g. Address the need for employability skills training, especially in relation to preparing a good resume, searching for a job and understanding work expectations, as well as life skills.</p>	<p>h. Improve the reach of the English language literacy activities throughout the population of jobseekers in need of English language skills.</p>
	<p>i. Improve coordination with programs that combine education, job training and preparation, counseling, and supportive services to</p>	<p>j. Increase access to education for those that have barriers.</p>	<p>k. Integration of agricultural workforce development programs.</p>	<p>l. The AEP will initiate a pilot project with the (I-BEST) strategy, a model that boosts students' literacy and work and college readiness skills, so students earn</p>

P.R. Workforce Development Program	State's Strategies:			
<p><b>Goal 6: Increasing Skills and Education Attainment</b></p>	<p>benefit out-school youth.</p>			<p>credentials, get living wage jobs, and put their talents to work.</p>
	<p>m. The 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.</p>	<p>n. Integration of career pathways into the adult education program curriculum-framework.</p>	<p>o. The DE-AEP will also focus on the update of the system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education.</p>	<p>p. Design of contextualized Instruction, including the STREAM approach.</p>
	<p>q. The DEPR-AEP will foster the development and implementation of technology applications, translation technology, distance education, including professional development to support</p>	<p>r. Integration of career counseling and planning into adult education.</p>	<p>s. Integration of employability skills into the classroom.</p>	<p>t. The DEPR-AEP will make efforts to incorporate Internet technology into adult education classrooms.</p>

P.R. Workforce Development Program	State's Strategies:			
<p><b>Goal 6: Increasing Skills and Education Attainment</b></p>	<p>the use of instructional technology.</p>			
	<p>u. The AEP will invest funds in developing interactive classrooms with Smart boards, internet access, learning platforms, online resources and learning materials libraries with the purpose on enhancing learning.</p>	<p>v. The AEP will equip with portable computers notebooks the adult education classrooms.</p>	<p>w. The AEP will implement a distance education program to provide the necessary space to let teachers boost the learning and skills gains on adult learners.</p>	<p>x. Design, develop and implement of a technical assistance mentoring program among service providers to pair expert providers with providers that are emerging in their development of career pathways and integrated education and training.</p>
	<p>y. Provide ancillary services like transportation, childcare, counseling, and other to facilitate program completion by those enrolled in training and education courses.</p>	<p>z. The DEPR-AEP is committed to develop high quality professional development activities, and support services which will help teachers/instructors better understand the career pathways systems and expand their professional knowledge.</p>	<p>aa. Enroll and ensure the continued support and participation of central government agencies in sector partnerships, especially to leverage discretionary sources to fund education, training, employment and supportive activities.</p>	

### III. OPERATIONAL PLANNING ELEMENTS

The Plan must include an Operational Planning Elements section that supports the State's strategy and system-wide vision described in Section II(c).

#### (A) 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 carried out).

#### **State Board Operational Structures and Processes**

The State Board was locally enabled under Act 171-2014 and OE-2014-064 to promote comprehensive planning and coordination of employment and training programs in the State. The PRDEDC has been directed to provide support to the board through the its Workforce Development Program, which also administers Title I of WIOA and the TAA. The Board has planning, and coordination responsibilities related to the federal support received through WIOA and other programs with workforce development efforts.

The development of the plan is a task that the State Board accomplishes with the collaboration of the interagency committee integrated by WIOA core programs in 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 particular 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.

#### **Functions**

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 and 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.

(2) Implementation of State Strategy

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

*(A) Core Program Activities to Implement the State's Strategy*

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

Integration of resources is accomplished through the regular sharing of information among the network of Core Partners and other providers. At the local level, State staff have been sponsoring meetings with local area Core Partners, educational institutions, and TANF staff to discuss their resources, target groups, and services.

Local areas are intended to continue the discussions and build upon the relationships initiated. At the LWDBs and their AJCs, the AJC certification policy requires that core and mandatory partners regularly provide cross-training on partner programs, implement cross-functional teams, are familiar with eligibility requirements for all programs, establish co-enrollment practices, and establish procedures for referrals.

**Table 56. Core Program Activities to Implement the State's Strategy**

Core Program	Program Activities to Implement the State's Strategy
WIOA Title I	<ol style="list-style-type: none"> <li>1. All MOUs will be reviewed.</li> <li>2. An analysis will be conducted to define the new regions of Workforce Development System in Puerto Rico.</li> <li>3. Expand the Registered Apprenticeship program in Puerto Rico.</li> <li>4. Puerto Rico Workforce System Brand Analysis.</li> </ol>

	<ol style="list-style-type: none"> <li>5. Develop and implement state policies to improve operational processes under WIOA.</li> </ol>
<p><b>WIOA Title II</b></p>	<ol style="list-style-type: none"> <li>1. Partnership with the Career and Technical Education area.</li> <li>2. Partnership with public and not for profit private institutions to foster new initiatives in integrated education and training.</li> <li>3. Implementation of online professional development for teachers.</li> <li>4. A pilot Project with (I-BEST) strategy for credentials.</li> <li>5. Collaboration with other core programs and partner’s agencies.</li> <li>6. The DEPR-AEP will update and expand the implementation of the Career Pathways system.</li> <li>7. Update the Implementation effort of the College and Career Readiness Standards (CCR Standards).</li> <li>8. The DEPR-AEP will foster the development and implementation of technology applications, translation technology, distance education, including professional development to support the use of instructional technology.</li> <li>9. Incorporation of Internet service technology into adult education classrooms.</li> <li>10. Preparing and setting interactive classrooms in the instruction centers</li> <li>11. Provision of portable notebooks in classrooms.</li> <li>12. Incorporating online public domain and subscription-based search platform in the interactive classrooms.</li> <li>13. Development of a distance education program Technical assistance mentoring program for service providers.</li> </ol>
<p><b>Wagner-Peyser Act</b></p>	<ol style="list-style-type: none"> <li>1. Provide technical assistance to WP staff to strengthen strategies to respond to the new challenges and demands of the labor market in the AJCs.</li> <li>2. Provide the competencies and skills necessary to the WP staff to understand the important role that technology plays in provision of career services to job seekers today.</li> </ol>
<p><b>Rehabilitation Act</b></p>	<ol style="list-style-type: none"> <li>1. Offering technical assistance to employers, as required, to promote extended support options through orientation activities to employees / coworkers interested in collaborating with the process and identifying resources available in the workplace and community.</li> <li>2. Continue the dissemination of the services in radio and television programs to increase the number of participants in the AJCs.</li> <li>3. Collaboration with the community rehabilitation programs (PRC), if required, in efforts to prepare and submit proposals for the provision of extended services to other sources of available funds.</li> </ol>

4. Identification and communication of needs concerning the recruitment, reclassification, training or any other requirement related to human resources.
5. Coordination of staff training activities with universities and other institutions preparing professionals related to the rehabilitation field.
6. Offering of advice and support on issues concerning the best use of human resources, particularly those assigned to the provision of direct services to meet the needs of the consumers.
7. Planning and provision of human resources (involves the analysis; design; establishment and elimination of positions; selection and recruitment; and the implementation of a system of personnel evaluation);
8. Forecasting of human resources needs (within a period of 1 to 5 years), by number and type of employee, emphasizing on the personnel that offers direct services to people with disabilities.
9. Provision of training and promotion of staff development.
10. Establishment of objectives and training activities to be offered to staff in order to comply with programmatic/administrative commitments of the agency.
11. Coordinate the participation of ARV staff in the American Job Centers (AJC), to properly channel the needs of those with disabilities who request information and/or services in such centers.
12. Identify possible referrals to the services of the ARV.
13. Provide the AJC staff with guidance on various topics of interest that are requested related to people with disabilities.
14. Actively participate in job fairs coordinated by the AJC.
15. Exchange of employment networks / employers.
16. Expansion of the provision of services to people with disabilities due to traffic accidents, through a collaboration agreement with the Automobile Accident Compensation Administration.
17. Expansion of the availability of information resources or training for new recruitment staff through the agency's internal page (intranet).
18. Continued with the use of remote interpretation video technology for deaf people.
19. Continued funding from CERPR and CEVI to assist and support their operations, as well as jointly develop with the ARV, better employment and independent living opportunities for our applicants / consumers.
20. Continuation with the financing of the SRC and the SILC to assist and support their operations as well as to develop, together with the PRVRA, better employment opportunities and independent living for our applicants/consumers.
21. Continuation with the use of the video remote interpretation technology for the deaf persons.



	<p>22. Expansion of the availability of the training resources to the newly recruited staff (e.g. modules), through access to the internal Web page of the agency (Intranet).</p> <p>23. Expansion of the provision of the services to the blind persons, with intellectual deficit and other disabilities, through training and employment to the Puerto Rico Industries for the Blind Company.</p>
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*(B) Alignment with Activities outside the Plan.*

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

The 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 partner programs. The activities listed in Section A were planned with the entire workforce development component of Puerto Rico. The strategic plan provides the framework for all workforce system, including but not limited to WIOA core programs.

**Job Corps**

As with all required partners, the local boards are coordinating with Job Corps Program for delivery of its service through the development of a MOUs entered into 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 in the process to complete the MOUs with each local board.

**Migrant and Seasonal Farmworkers Program**

The MOU between PRDOLHR and PathStone will facilitate the provision of educational services to MSFWs. PathStone provides education and information to agricultural workers on farms and camps and, in some locations. Through the Outreach Program, the 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, which include community service employment for unemployed low-income persons who are age 55 or older, particularly persons 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, the PRDOLHR, AARP, and Pathstone, Inc. are the SCSEP grantees.

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

The Puerto Rico State Board of Career and Technical Education is the entity responsible for the implementation of the Carl D. Perkins Career and Technical Education Act. The Puerto Rico Department of Education is the state agency responsible for administering the program and oversees CTE in the public-school system at both secondary and postsecondary levels. Consistent with the conditions set forth in an MOU, information regarding postsecondary course offerings and activities are available to individuals at all One-Stop career centers and the Department collaborates with local boards throughout Puerto Rico to help ensure a comprehensive workforce preparation system. A PRDE representative from 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 (as 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 postsecondary 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 furthering cooperative agreements with the Technological Institute and other public and private postsecondary 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. Also, the PRDE will continue offering the dual credit program in 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 as a result 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 a wage subsidy to workers 50 years of age 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 the TAA services will be effectively integrated to the AJCs and use the network as the main point of participant intake and delivery of TAA program benefits and services. The PRDEDC has developed *State Policy Number 2020-001* to ensure that the correct process is implemented in the assistance to TAA clients.

**Activities authorized under chapter 41 of title 38, United States Code**

Puerto Rico Department of Labor, through the Jobs for Veterans State Grant (JVSG), is committed to serving transitioning service members, veterans, and their families by providing resources to assist and prepare them to obtain meaningful careers and maximize their employment opportunities. JVSG commitment is an important part of fulfilling our national obligation to the men and women 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 men and women transitioning from the wars in Iraq and Afghanistan, to the civilian labor force. Additionally, we are working with workforce partners to ensure changes are affected so workforce programs are aligned with the roles and functions established in their authorizing legislation.

**Disable Veterans' Outreach Program Specialist (DVOP)**

The JVSG staff was refocused on their statutory duties to ensure that eligible veterans and eligible spouses receive 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. As a result, DVOP specialists will serve a narrower group of veterans and eligible

spouses, enabling the specialists to provide Individualized career services to a vast majority 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 service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the USDOL. Policies and procedure are in place to specifically prohibit DVOP specialists from performing non-veteran related duties that detract from their ability to perform their statutorily defined duties related to meeting the employment needs of eligible veterans. Additionally, regular audits are performed by the DVET to ensure compliance with the limitations on the duties of DVOP specialists.

DVOP specialists also place maximum emphasis on assisting veterans who are economically or educationally disadvantaged. To ensure that DVOP specialists can fulfill their statutory responsibilities to provide intensive services to these categories of veterans, they are required to follow guidance developed by USDOL 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 or, in instances where a DVOP specialist is not available, another provider of intensive services.

### **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 to employers, employer associations, and business groups the advantages of hiring veterans. LVERs, where implemented, are part of the One-Stop Career Centers "business services team" or like entity, and as such serves as an active member of that team. Also, 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 to recruit qualified veterans;

- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating with other business outreach efforts.

### **Gold Card Initiative**

The Gold Card provides unemployed post-9/11 era veterans with the intensive and follow-up services they need to succeed in today's job market. The Gold Card initiative is a joint effort of the DOLETA and the Veterans' Employment and Training Service (VETS). ETA and VETS have developed a series of enhanced intensive services, including follow-up services, to identify those barriers to employment faced by veterans of post 9/11 era. The services, when provided under the Priority of Services to Veterans, are designed to overcome those barriers and to reinsert our 9/11 era veterans the labor workforce.

The enhanced in-person services available for Gold Card holders at 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 in making training and career decisions;
- Provision of labor market, occupational, and skills transferability information that inform 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)**

The PRDOLHR's UI programs include the following: regular UI, UCX, UCFE, TRA and PAB.

The main purpose of the Unemployment Insurance is to pay benefits to claimants and help them to 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.

The PRDOLHR is committed to improve reemployment service delivery strategies. These strategies are contained 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 reemployment services to UI claimants selected to participate in the RESEA program. A UI merit staff member are available to work on program

management. The role of this UI staff member is to serve as a point of contact for technical assistance regarding UI issues, policies and procedures.

The approach will ensure 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 reemployment services (RES) including guidance, evaluation, Individual Reemployment Plan, labor market Information focused on claimants needs, referrals to job search self-directed, additional services (job search workshops, assistance in finding employment, occupational counseling and referrals to other services) and eligibility review to continue receiving unemployment benefits (UI).

RESEA staff will provide the traditional RESEA activities such as the 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 deem necessary, case management, one on one personal interview 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 UI claimants with labor market information. These services will be managed by the Reemployment 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 monitor closely these strategies to assure its successful implementation to help UI claimants in RESEA to return to the labor market before they exhaust their UI benefits. Through the RESEA initiative, ES will make efforts to implement strategies to achieve improved UI connectivity with the public workforce system and improved reemployment service delivery strategies. PRDOLHR is committed in continuing making 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 strengthening to identify and pursue braided funding opportunities to support common services and to transition to procedures that facilitate serving customers under both TANF and the core programs. In the short-term, cross-program knowledge and understanding of the 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 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 Sureste LWDB is going through the qualification process.

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

As required under 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 carried out 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 roughly twice the national average, entrepreneurship development still lags significantly when 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 6 local areas, and its specialized centers for international trade, technology and innovation, and the program initiatives servicing students, women, veterans and national guard reserve personnel, young and emerging entrepreneurs, older persons, and homemakers. The local boards shall also be encouraged to leverage the small business regional clustering organization initiative serving 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 employer's availability in 76 of 78 Municipalities

identified and Labor Surplus Areas.

**Programs authorized under section 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), which is 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 the Congress in understanding the potential impact of reestablishing the Supplemental Nutrition Assistance Program (SNAP) in Puerto Rico in lieu of block grant funding. The block grant remains.

Under NAP (and TANF), coordination has been established to require unemployed able-bodied adults to register for work at the employment Registry of the Employment Service and seek employment. Individuals are required to participate in employment and training activities or employment interviews and accept or continue in employment if it is adequate. An MOE funded Puerto Rico Food Benefit Program provides for a six-month additional TANF benefit for food to be paid to NAP recipients who work at least 30 hours weekly, are not TANF recipients, and are single parents or relatives living with a related minor under 18. Certain unemployed able-bodied adults are exempt from the work requirement.

**Programs carried out 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 the Persons with Disabilities. The system's components that provide services to persons with disabilities will be made aware of the obligations arising under sec. 20 of the Rehabilitation Act, including providing information on means of seeking assistance under the Client Assistance program. The PRVRA, as state-designated agency for administering the core program under the Rehabilitation Act will also continue enforcing compliance section 102, providing individuals 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 is under the PRDEDC. The WDP is in charge of the implementation of the program in the workforce system. As part of the strategy for an effective implementation, the WDP is receiving technical assistance by the National Apprenticeship Office and Region I in Boston. Work-based learning opportunities offered by the AJC are marketed by both Case Manager's and Business Services Representative



staff. This staff pursues opportunities with employers and make appropriate referrals for work-ready participants. The PRWDB coordinates work-based learning opportunities across partner agencies to ensure maximization of employer contact and avoid business-contact fatigue. The PRWDB researches 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 standards described under Career Services feedback mechanisms between Training Services and placement functions are in place to ensure that the training being provided is meeting the needs of business.

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*(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.

DEDCs the lead agency for the administration of three core WIOA programs. DEDC is also responsible for TAA grant. The PRDOLHR is responsible for Wagner-Peyser, Veteran Services through the Jobs for Veterans State Grant, and UI. The Vocational Rehabilitation Administration, under the PRDOLHR is present at the AJCs. Additionally, the SCSEP, is also within PRDOLHR but partially but partly since AARP and Pathstone, Inc. are also operators of the program. The AJCs are primary access points for much of the services provided by DEDC and PRDOLHR programs.

DEDC is collaborating with partners, to develop memorandums of understanding, cross-training, procedures and best practices to facilitate the integration of services to ensure job seekers' needs are being met and referrals to other resources are successful.

DEDC and PRDOLH worked in the development of the Participant Record Information System (PRIS), a new database system used across the 16 AJCs in Puerto Rico. In its initial phase Title I-B programs and W-P are integrated. In the next two months we will be initiating the final stages of development to streamline the application process for individuals who seek employment services and integrate or interface the participant management systems of WIOA Titles I, II, III, and IV and other required partners.

The intent of this process is to gather comprehensive and consistent information so that appropriate workforce development services will be provided. DEDC is going to

encourage co-enrollment, this includes the sharing of relevant customer program information and records such as referral information, assessment results, training plans, progress reports, and job-development strategies. Referrals will be made to services that are deemed appropriate and each provider will be responsible for following up with those referrals in order to provide services. This process will help coordinate and align services that are provided through the workforce development system and will ensure those needing services through the workforce system are receiving appropriate services.

DEDC's objective is to maintain a fully integrated workforce development system that ensures availability of workforce services to all customers, with a focus on veterans and military spouses, low-income individuals, public assistance recipients, adults and youth with disabilities, out-of-school youth, and individuals with barriers to employment.

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

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

The Employer Engagement Committee of the State Board and the Workforce Development Program of the DEDC are leading the process to develop the Business Service Unit at State Level and lead in development of the Statewide Business Services Framework Plan to guide the LWDBs and the AJC to collaborate with businesses. DEDC had contracted the consulting firm Estudios Técnicos, Inc. to carry out this process.

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

In addition, the mentioned firm is going to assist the DEDC and the State Board to develop and implement strategies for layoff aversion. Those strategies are aimed to the business services 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 and to 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 have their own Employer Engagement committees composed of business representatives. These Committees will help develop the teams, provide

guidance and recommendations, ensure professional development, establish specific goals for the teams, and track progress.

DEDC also is going to contract a consultant to evaluate the AJC brand among employers. The consultant will conduct 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 the AJCs. The assessments will be 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 the AJCs. This rate would help raise the confidence of employers in the workforce system 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, interview and hiring services.

Services to employers include:

- Interviews and screening of job candidates to select skilled and trained personnel who will fill 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 with Health and Drug Testing, criminal records, and required certifications for prospective employees.

The 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 in order to get more qualifying employers to use the tax credit program and increase our number of certifications.

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*(E) Partner Engagement with Educational Institutions.*

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

As previously discussed, the State Board will coordinate with the PRDE's State Board for Career and Technical Education, the PRDOLHR and the education services industry, 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 are critical to the successful implementation of the Registered Apprenticeship program. Including that the all system will develop and deploy a training program to educate staff in AJC about how to work with structured work-based learning programs. Also, the designing of that framework will contribute to collaborate on pre-apprenticeship program 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 postsecondary 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 in training programs and post-secondary educational institutions. The PRVRA sponsors to consumers such training in various accredited educational institutions for acquiring knowledge and occupational skills necessary for the workplace.

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

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*(F) Partner Engagement with Other Education and Training Providers*

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

As required under 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 initial determination of eligibility and subsequent certification of training providers.

In 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 to access or provide services, if any.
- Determine the occupations for which they are requesting training services, which shall be 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 the 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 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.

Exception made of Registered Apprenticeship, One-Stop Centers' operators are required to collect performance information and determine whether the providers meet the

performance criteria. Providers that meet the criteria are considered eligible providers of training services.

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*(G) Leveraging Resources to Increase Educational Access.*

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

Maximizing available funding and the leveraging of non-traditional funding sources to support the improvement of the workforce system is a key goal of the State Unified Plan. PRDE's lead in developing career pathways will allow combining the efforts and resources available to both Title II and Carl D. Perkins programs to advance their implementation, thus expanding the flexibility of the postsecondary educational system.

Collaboration with the PRDOF will add to the workforce system, resources available through TANF vocational education services and the Chafee Education and Training Voucher program, representing additional opportunities to serve the workforce needs of low-income individuals and youth. Through continued coordination, State resources currently devoted to providing for bridge education, vocational education, subsidies and tax expenditures can also be leveraged to support the system. A case in point, the PRVRA intends to request funding from the State's Employment and Training Opportunities Development Fund, which accrues 1% of all taxable salaries paid by employers' beneficiaries under the Employment Security Act and the proceeds of interest paid on the Benefits for Non-Occupational Disabilities Law.

An enhanced coordination with the PREC will allow the harvesting of data being supplied by educational institutions under local and federal mandates to retrofit the educational and workforce systems. Additional opportunities could arise by devising ways in which the Council's State student financial assistance programs support the strategies of the system.

Local areas will be encouraged to leverage the resources of required partners to support the delivery of integrated services, through financial and non-financial agreements. Many of the arrangements for sharing other state resources must be worked out in detail at local level involving other agencies and the local One-Stop Centers' partners, through MOUs.

A key strategy in leveraging other Federal investments that have enhanced access to workforce development programs at educational institutions is to equip the State Board to manage the function of identifying and seeking additional or dormant competitive funding opportunities that can benefit any component of the workforce development

system. DEI and REO, among others, represent additional opportunities. To that end, the State is committed to advance the designation of the local boards as 501(c)(3) tax-exempted non-for profits to leverage non-traditional sources of grant funding.

Regarding local governments, through guidance pertaining the local area and regional planning processes, there is also the opportunity to encourage Chief Elected Officials to sponsor municipal tax abatement measures and other benefits to reward businesses and employers sponsoring the implementation of career pathways.

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*(H) Improving Access to Postsecondary Credentials.*

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

As discussed, the offer of postsecondary education in Puerto Rico has grown significantly in the past decade, with mid-skilled level education being the segment with the largest expansion. Even within, institutions of higher education, the advance in mid-skilled careers, certificates and degrees has been noticeable.

Although the dynamics are varied, along with the growth in the number of institutions providing career and technical education, the increase in mid-skilled graduates evidences that access to a postsecondary degree and credentials has become somewhat more flexible in recent years and that there is a sizable infrastructure to support it. Please, refer to section II(A)(2)(A), for additional information on the education infrastructure and credentialing activities in the jurisdiction.

Under WIOA, alignment activities will be pursued to engage the providers of education and training to implement strategies that facilitate access to postsecondary credentials. As explained in section III(c)(2), above, the State will advance the implementation of career pathways to expand the accessibility industry recognized credentials. The strategy is key to provide participants with multiple entry points to accommodate academic readiness and multiple exit points to permit on ramp and off ramp when necessary, to lead to industry-recognized credentials, as recommended by the USDOL.

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*(I) Coordinating with Economic Development Strategies.*

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

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 for the creation of thousands of jobs in manufacturing, aerospace, telecommunications and 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 as well as start-ups and locally owned businesses;
- Improve Puerto Rico's regulatory and structural framework in order to enhance its competitiveness as a destination for investment and the 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.

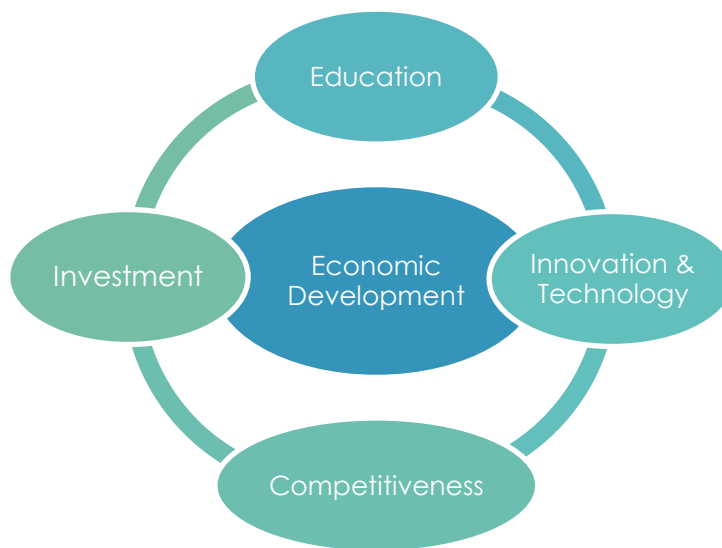
### **Main Components of Economic Development**

Puerto Rico's education must be transformed to foster a maximum level of innovation & 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 is a key for economic development, so there is the 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 work force to reinvent themselves, as they need.



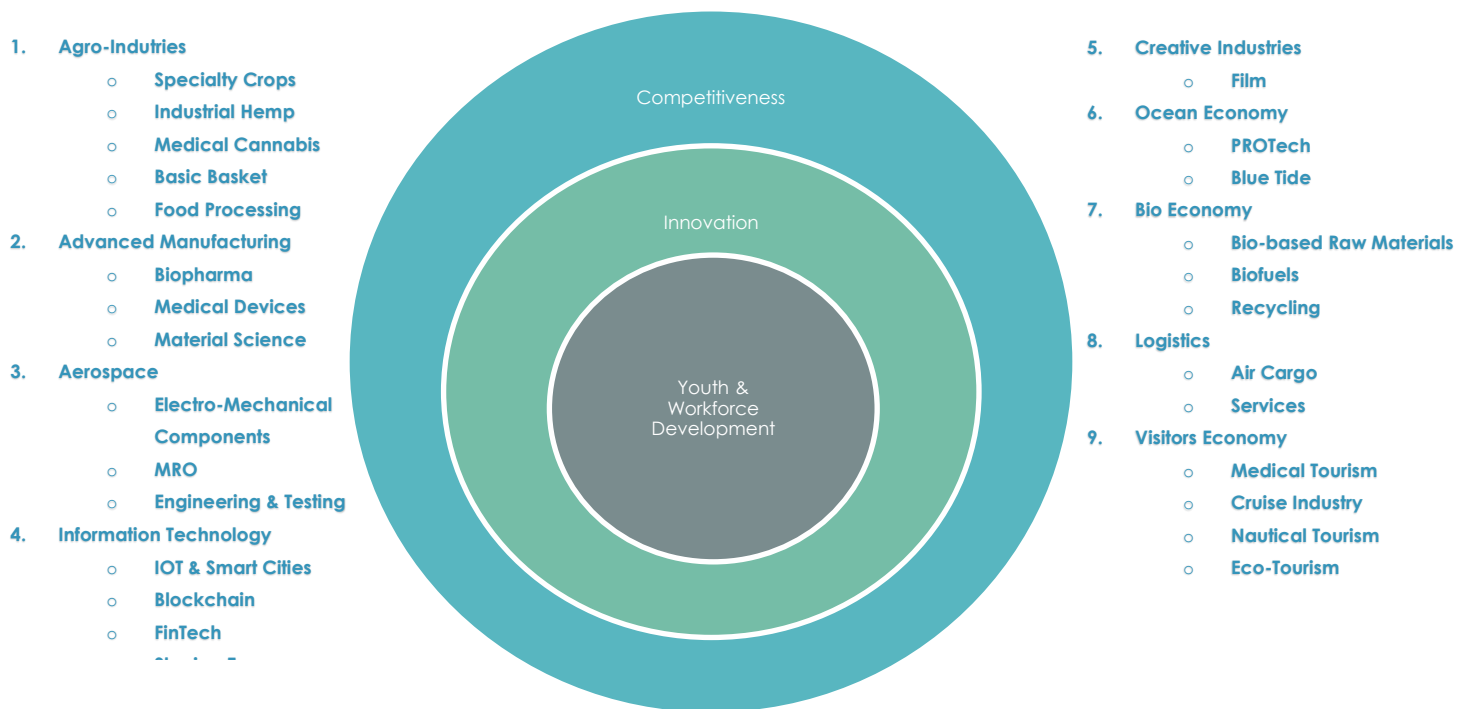
Figure 11. Main Component of Economic Development



### Innovation: Solid Ecosystem for Entrepreneurship

In order to establish a healthy and sustainable ecosystem of innovation it is fundamental that the projects of entrepreneurship respond to the needs of the market. PRDEDC will provide Technical and Financial Assistance in areas like Market Needs; Applied Research; Incubators Startups; Accelerator Startups; Substitution of Imports of Goods and Services.

Figure 12. Strategic Areas for Economic Development



### **Competitiveness: Structural Reforms**

1. Structural Reforms: Labor Permits Tax Energy
2. Eliminate Requirement for Electronic Export Information (EEI) - Elimination of the federal requirement for export, achieving an equal treatment in order 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 economic sectors.
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 Government. Allows for 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 in order to improve quality and efficiency in processing requests for all permits, licenses, inspections, complaints, certifications, consultations, or any other authorization that affects in any way the operation of a business in Puerto Rico, including those issued by municipalities.

## (B) STATE OPERATING SYSTEMS AND POLICIES

The Unified 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

The State operating systems that will support the implementation of the State's strategies. This must include a description of –

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

### **Workforce and labor market information systems**

The workforce and labor market information system (WLMI) established under section 49I-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 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 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 USDOL, the PRDOLHR also produces a statewide annual economic analysis report, 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 around sector strategies and career pathways initiatives.

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

- Longitudinal Employer-Household Dynamics (LEHD). LEHD links employee and employer 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 detailed industry, gender, and age of workers. Although all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands have joined the LED Partnership, the LEHD program is not yet producing 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 and 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 during that quarter the individual worked.
- 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 the 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 improve the education policy and the operational decisions with data related to the student's 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 the 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, 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, which 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 decisional process.

The Education Council collects, analyzes and disseminates detailed data on K-12 educational institutions, vocational and technical institutions, and IHEs. Data available at: <http://cepr.cespr.org/ceprd/index.asp>.

## **DATA, COMMUNICATION AND CASE MANAGEMENT SYSTEMS**

**Participant Record Information System (PRIS).** The Department of Economic Development and the Department of Labor and Human Resources of Puerto Rico, Title I-B programs, grantees of UI, Wagner - Peyser Employment Services (ES), were allocated a grant of RSI-DWGs fund to integrate our Title I-B, UI, Wagner - Peyser Employment Services (ES) to the workforce information technology (IT) systems. The Puerto Rico database system is the Participant Record Information System (PRIS) and entered on function on March 9, 2020. The technology solutions include a common registration and case management across Title I and Title III programs. The software solution for WIOA workflows, is in compliance with the Training and Employment Guidance Letter (TEGL) 05-16, and the WIOA Participant Individual Record Layout (PIRL).

In compliance with the Section 116(d)(1) of WIOA and related federal guidelines, the system consists in a multiuser web-based software based on the PIRL, including the validation rules established by DOLETA and the reports related with 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 a 100% error free, comma delimited text files (csv files) based on the PIRL schemas for all the programs.

The software was developed according with the PIRL Schemas CSV files and will be used by the sixteen programs included in PIRL.

**State Wage Interchange System (SWIS).** Puerto Rico signed the SWIS Agreement with DOLETA, which incorporates all six WIOA core programs to exchange interstate quarterly wage records. Since January 1, 2020, all Queries for Wage Data for all applicable programs are 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 board (fifteen) provide the data required by the system, regardless the use of internal financial information systems.

**Claimants' Services Web Portal.** The system allows filing an unemployment insurance claim 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 became unemployed due to reasons beyond their control. Any application submitted after 5pm, from Monday to Friday, will be processed the next working day. Time 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.

**Adult Information System (AIS).** The Puerto Rico Adult Education data collection reporting system uses the Adult Information System (AIS) designed to help providers collecting, analyzing and using data to identify and implement strategies to achieve expected levels of performance. Current efforts are focused on the Adult Information System, which will strengthen compliance with NRS requirements. The Adult Information System is an application that manages the processing of information in the different functional areas; it complies with the regulations and requirements of the Adult Educational System and manages the required Federal reporting for the NRS System. The application allows for the simultaneous creation and administration of locations independent of each other. It is web-based with an integrated security protocol and conveniently designed in modules.

The application has the capability of generating transactions following a procedural flow with requirements and authorizations for admissions, assigning staff, programming of

courseware, registration, creation of file documents, and academic matters. It also processes the electronic filing of documents by capturing a variety of documentation already in the system, minimizing in this way the filing of forms and conversion of documents to digital form within different functional areas. Users can generate follow-up files in a digitally centralized way for each functional area; reports are selected depending upon level of security access and the users' functional roles.

**Consumer Rehabilitation Information System (CRIS).** The PRVRA maintains the 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 the 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 students with disabilities.

**Job Banks.** PR.JOBS is the PRDOLHR's official Job Bank. This resource, available to employers and job seekers in general, is provided free of cost by Direct Employers as part of an agreement to NASWA to provide such 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. The 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 get access to skills transferability tools like MyNextMove and MySkillsMyFuture. A registered employer will find a network of jobseekers in search of employment and can search their resumes online matching their job opportunity and allowing them to extend an invitation for an interview totally transparent to the job seeker.

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

The implementation process of the new software for data collection and information management is in its last phase of review. The PRDEDC expects to release the PIRL compliance reports of the PRIS program on April 15, 2020. Currently there is no data on the programs, with the new report it is expected to present the statistical information for the last four years. The expected results are:

- Improved Service Delivery and Employment Outcomes for Dislocated Workers;



- More Effective Connections to All Available Services through Integrated Case Management;
- Prevention of 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.

**AIS.** The Adult Information System complies with the regulations and requirements of the Adult Educational System and manages the required Federal reporting for the NRS System.

**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 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 Centers network.

(3) State Policies that will Support the Implementation of State's Strategies

The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system.

The State Board will review its policies to comply with the requirements under WIOA. In order to bring all practices into compliance with WIOA and other federal regulations, the PRDEDC and the State Board will establish in the next months the following local policies or guidance:

**Table 57. In-Process State Policies and Procedures**

Local Policy	Description	Local Policy Number	Expected Date
1) Cash Management	Policies and procedures for cash management	TBD	April 2020
2) Cost Allocation	Policies and procedures for cost allocation	TBD	April 2020
3) Closeout Federal Grant	Policies and procedures for Closeout of federal grants	TBD	April 2020
4) Payroll base on budget	Policies and procedures for payroll base on budget	TBD	April 2020

Local Policy	Description	Local Policy Number	Expected Date
5) Financial Reporting	Policies and procedures for financial reporting of federal grant	TBD	April 2020
6) Trade Adjustment Assistance	Requirements when approving Trade Adjustment Assistance (TAA) Training for petitions.	2020-001	March 2020
7) On the Job Training	This policy provides guidance regarding the limitations and eligibility of individuals to participate in On-the-Job Training (OJT) opportunities.	TBD	March 2020
8) Roles and responsibilities of directors, local boards and elected officials of the One-Stop Centers	Establish the roles and responsibilities of the actors involved in the fiscal and programmatic areas in the One-Stop Center.	TBD	April 2020
9) Case management	Provide guidance for carrying out case management interventions (eligibility, referrals, training activities, employment, etc).	TBD	April 2020
10) Local Board Certification	Policy for compliance with local board certifications.	TBD	April 2020
11) Local area designation	To provide guidance and process for the designation and subsequent designation of Workforce Development Areas.	TBD	May 2020
12) Youth Program Guidance	Guide to define concepts, eligibility, and other aspects related to the youth program.	TBD	May 2020
13) Expense requirements	Policy to determine requirements for the expenditure level of training activities.	TBD	May 2020
14) Rapid Response	Políticas para intervenir en asuntos de respuesta rápida a nivel Estatal	TBD	May 2020
15) Customized training	This policy provides guidance to the Local Areas as they implement	TBD	May 2020

Local Policy	Description	Local Policy Number	Expected Date
	Customized Training for the Adult and Dislocated Worker programs.		
16) Conflict of interest	This policy is established to provide direction for sub-recipients, contractors, staff and board members of Puerto Rico Local Workforce Development Boards in order that business can be conducted within the guidelines that will prevent actual, potential, or questionable conflicts of interest.	TBD	April 2020
17) Policy on recapture and reallocation of funds	This policy describes the reallocation and recapture of local area Workforce Innovation and Opportunity Act (WIOA) allocations for youth, adult, and dislocated worker activities.	TBD	May 2020
18) WIOA Operational Guidelines	Guidelines about basic services, training services, Individualized career services, case management, rapid response and other operational regulations of WIOA	No number required	May 2020
19) Local Areas Designation	WIOA policy requirements for establishing local areas.	TBD	May 2020
20) Composition of Local Boards	WIOA Standard Requirements for Boards	TBD	May 2020
21) One-Stop Center Certification	Policies and procedures for the certification of One-Stop Center	TBD	May 2020
22) State Apprenticeship Implementation Guide	Policies and procedures for establishing a State Apprenticeship Agency	TBD	June 2020
23) Local Board Cost Allocation Guidance	Guidelines about cost allocation procedures for all Local Board.	TBD	June 2020
24) Access to information	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	TBD	June 2020

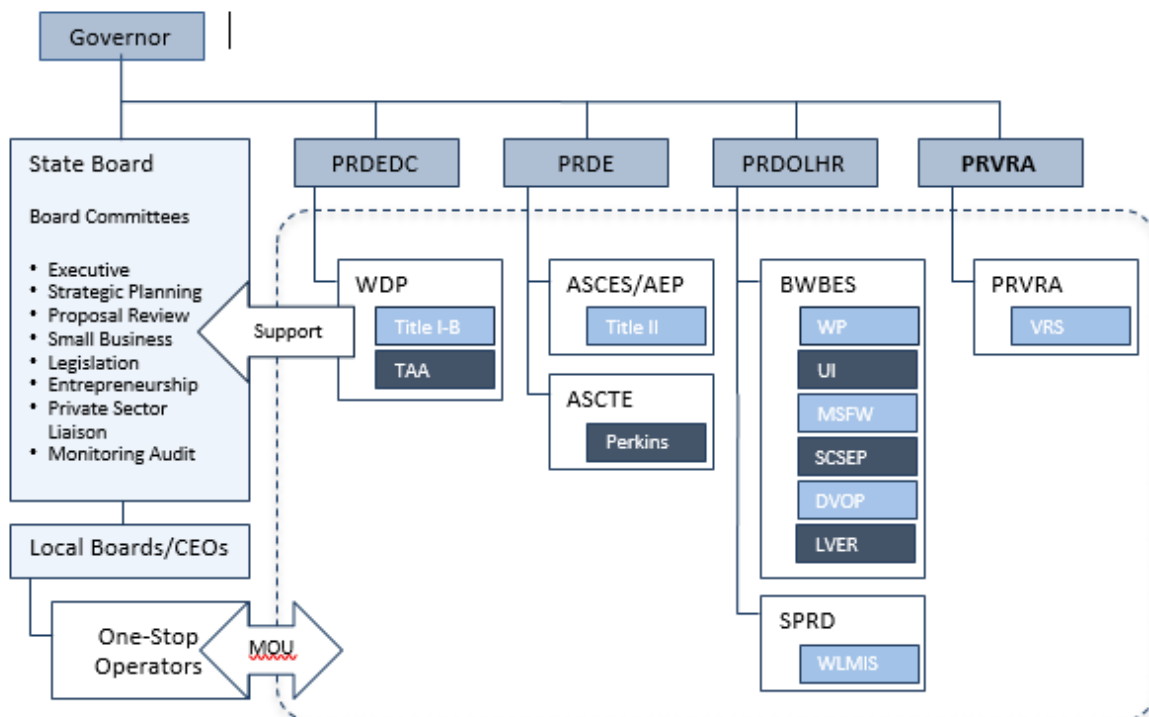
Local Policy	Description	Local Policy Number	Expected Date
	boards, such as data on board membership and minutes.		
25) Accessibility to individuals with disabilities	Policy to ensure the physical and programmatic accessibility of all One-Stop Centers with the individuals with disabilities.	TBD	June 2020

(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.

Figure 13. Organizational chart of workforce system with core programs



*(B) State Board*

Provide a description of the State Board, including –

*i. Membership Roster*

Provide a membership roster for the State Board, including members' organizational affiliations.

The Puerto Rico Workforce Board operates in accordance with the Federal Workforce Innovation and Opportunity Act and local regulations. The Board's responsibility is to lead strategic efforts in Puerto Rico to strengthen and develop the workforce system. Representation on the Puerto Rico Workforce Board is mandated by federal and state law. The board includes representation from government agency leaders, elected officials, private sector representatives, and other representatives of Puerto Rico's workforce. Most of the board member are private business representative.

**Table 58. WIOA Workforce Members**

<b>Member Name</b>	<b>Affiliation</b>	<b>Organization</b>
Wanda Vázquez Garced	Government Representative	Governor, Puerto Rico
Carlos Méndez	Government Representative	President, Puerto Rico Representatives Chamber
Miguel Romero Lugo	Government Representative	Senator, Puerto Rico
Manuel A. Rivera Laboy	Government Representative	Secretary, Department of Economic Development and Commerce
Eligio Hernández Pérez	Government Representative	Secretary, Puerto Rico Department of Education
Briseida Torres Reyes	Government Representative	Secretary, Puerto Rico Department of Labor
Luis Fernández Trinchet	Government Representative	Secretary, Puerto Rico Department of Housing
Eddie García Fuentes	Government Representative	Acting Secretary, Puerto Rico Department of the Family
Madeline Hernández Dipiní	Government Representative	Vocational Rehabilitation Administrator

Rosachely Rivera Santana	Government Representative	Mayor, Gurabo Municipality
Felix Delgado Montalvo	Government Representative	Mayor, Cataño Municipality
Emilio Colón Zavala	Business/Industry Representatives	ECZ Group
Nelson Ramírez	Business/Industry Representatives	Secure Tech Group
Coral Cummings Pino	Business/Industry Representatives	Walgreens Puerto Rico
Vanessa de Mari Monserrate	Business/Industry Representatives	F&R Management Services LLC
Jorge Capó Matos	Business/Industry Representatives	American International Plaza
Sonia Navarro González	Business/Industry Representatives	Brodersen Enterprise of P.R.
Luz Disla Peña	Business/Industry Representatives	Finanzas al Día, Inc.
Lymaris Otero Cruz	Business/Industry Representatives	Asociación de Comercio al Detal, Inc.
Carl Leyva Ramos	Business/Industry Representatives	Carl Leyva & Asociados, Corp.
Michael Pabón Rivera	Business/Industry Representatives	CIC Construction
Umberto Donato Solís	Business/Industry Representatives	DDD Group
Christian González Ortiz	Business/Industry Representatives	Wovenware, Inc.
Peggy Abreu Albarrán	Business/Industry Representatives	Honeywell
Elizabeth Alonso Quiñones	Business/Industry Representatives	Hidroponistas de Puerto Rico
Luis Burés Martínez	Business/Industry Representatives	Puerto Rico Aqueduct and Sewer Authority (PRASA)
Irba Batista Cruz	Workforce Representatives	Secretary of the Central Federation of Workers
Alexis Torres O'Farril	Workforce Representatives	Construction Inspector, PRIDCO
Mildred Huertas	Workforce Representatives	Rector, Ana G. Méndez University
Oswaldo Ubiñas Nieves	Workforce Representatives	Director, Ramey Job Corps
Olga Ramos Carrasquillo	Workforce Representatives	President, Boys & Girls Club Puerto Rico
John Viguera Ortiz	Apprenticeship Representative	President, LiUNA-Puerto Rico District Council

Note: Board vacancies are pending Governor's appointments.

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*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 particular 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.

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

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*(A) Assessment of Core Programs*

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

Please, refer to section II(b)(4), above.

**Title I-B**

The State will continue to assess the program based on the results of fiscal and programmatic monitoring, and 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 the 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.

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

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#### *(B) Assessment of One-Stop Program 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. Such state assessments should take into account local and regional planning goals.

Due to unexpected technology related issues that affects Commonwealth's ability to submit the Quarterly PIRL Reports, the PRDEDC requested in 2018 an extension in order to

not be considered failing to report according to Section 116(f)(1)(B) of WIOA. At this moment, our software is in its last phase of revision and is expected to be ready in March of this year. We will be able to report reliable and accurate data on program performance from the second quarter of this year.

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*(C) Previous Assessment Results*

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of 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.

No data available at this moment.

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*(D) Evaluation*

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

Puerto Rico will conduct evaluations and research on the implementation of WIOA core programs. The evaluation process is important in order to determine the effectiveness of the planning and implementation processes of the strategic plan. Plans for this in-depth evaluation process include:

- Establish regular meetings to evaluate the performance of the local areas. These meetings should assess if the activities carried out by the local area staff are consistent with the goals set out in the strategic plan;
- Conduct a formative evaluation of services, resources and activities at the local and state levels. This evaluation will provide the appropriate knowledge for decision making at the management level;
- Annual evaluation of the performance of local areas and the effectiveness and efficiency of the services offered through WIOA core programs.
- The evaluation measures are those set out under section 16(b)(2)(A) and include the six primary performance indicator; and

- Formative evaluation will help in the process of identifying areas for improvement. The collaboration of agencies, internal staff and external resources will be solicited to work on projects to improve the effectiveness of core programs.

The results of the first phase of PRIS will be used as a basis for future evaluations and will determine whether a modification of the strategic goals is necessary and consistent with the results of the evaluation.

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#### (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.

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##### (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 –

The Governor allocates WIOA formula funds allotted for services to youth, adults and dislocated workers in accordance with WIOA sections 128 and 133. Within-State allocations are made in accordance with the allocation formulas contained in WIOA sections 128(b) and 133(b).

Of WIOA formula funds allotted for services to youth, adults and dislocated workers, the Governor's Reserve funds from each of these sources for statewide workforce investment activities. In making these reservations, the Governor reserves up to 15 percent from each of these sources. Funds reserved under this paragraph 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. 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.

##### 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 128(b), as follows:

- $33\frac{1}{3}$  percent on the basis of 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 all areas of substantial unemployment in the State;

- 33<sup>1/3</sup> percent on the basis of 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
- 33<sup>1/3</sup> percent on the basis of the relative number of disadvantaged youths in each workforce investment area, compared to the total number of disadvantaged youths in the State. (WIOA sec. 128(b)).

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

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

- 33<sup>1/3</sup> percent on the basis of 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;
- 33<sup>1/3</sup> percent on the basis of 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
- 33<sup>1/3</sup> percent on the basis of the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in the State. (WIOA sec. 133(b))

iii. Dislocated worker employment and training activities

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

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

- Insured unemployment data;
- Unemployment concentrations;
- Plant closings and mass layoff data;
- Declining industries data;
- Farmer-rancher economic hardship data; and
- Long-term unemployment data.

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*(B) For Title II*

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

Please, refer to section VIII. (A) and (B), below.

- ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

Please, refer to section VIII. (A) and (B), below.

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*(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.

Not applicable.

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*(6) Program Data*

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*(A) Data Alignment and Integration.*

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. Separately, the Departments of Labor and Education anticipate working with States to inform future guidance and possible

information collection(s) on these accountability systems. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

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

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

The Puerto Rico database system is the Participant Record Information System (PRIS) and enter on function on March 9, 2020. The technology solutions include a common registration and case management across Title I and Title III programs. The software solution for WIOA workflows, is in compliance with the Training and Employment Guidance Letter (TEGL) 5-16, and the new WIOA database ("Participant Individual Record Layout (PIRL). We expect that by the first deliverable phase of the project, we will be able to report accurate data by the third quarter of PY 2019.

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

Please, see below.

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

### **Participant Record Information System (PRIS)**

The Department of Economic Development and the Department of Labor and Human Resources of Puerto Rico, Title I-B programs, grantees of UI, Wagner - Peyser Employment Services (ES), were allocated a grant of RSI-DWGs fund to integrate our Title I-B, UI, Wagner - Peyser Employment Services (ES) to the workforce information technology (IT) systems. The Puerto Rico database system is the Participant Record Information System (PRIS) and entered on function on March 9, 2020. The technology solutions include a common registration and case management across Title I-B and Title III programs. The software solution for WIOA workflows, is in compliance with the Participant Individual Record Layout (PIRL).

In compliance with the Section 116(d)(1) of WIOA and related federal guidelines, the system consist in a multiuser web based software based on the Participant Individual Record Layout (PIRL, ETA-9172), including the validation rules established by DOLETA and the reports related with 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 a 100% error free, comma delimited text files (csv files) based on the PIRL schemas for all the programs.

The software was developed according with the PIRL Schemas CSV files and will be used by the sixteen programs included in PIRL. In the initial phase of the PRIS system, Title I-B programs and W-P fully integrated. In the next two months, the Workforce Development Program will be initiating the final stages of development to streamline the application process for individuals who seek employment services and integrate or interface the participant management systems of WIOA Titles I, II, III, and IV and other required partners.

To comply with this phase DEDC have to establish data share agreements with each partner willing to be integrated in the system, either by sharing the data, or by achieving an interface to share customer engagement information. This will improve both client services and reporting with respect to data analysis and client activity. The intent of this process is to gather comprehensive and consistent information so that appropriate workforce development services will be provided.

Referrals will be made to services that are deemed appropriate and each provider will be responsible for following up with those referrals in order to provide services. This process will help coordinate and align services that are provided through the workforce development system and will ensure those needing services through the workforce system are receiving appropriate services.

### **State Wage Interchange System (SWIS)**

Puerto Rico signed the SWIS Agreement with DOLETA, which incorporates all six WIOA core programs to exchange interstate quarterly wage records. Since January 1, 2020, all Queries for Wage Data for all applicable programs are 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.

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

The core programs will adjust their case management systems in order to collect data for the performance accountability system under WIOA. PRIS software must produce ETA 9169, ETA 9173, ETA 9171 report according with the performance schedules.

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#### *(B) Assessment of Participants' Post-Program Success*

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The DEDC is going to provide continuously technical assistance to the AJC related to PRIS and reporting process, planning and providing services utilizing the new performance measure as a guide. The technical assistance includes on-site visit to the Local Areas, explaining in full detail the performance measures and related terminology.

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#### *(C) Use of Unemployment Insurance (UI) Wage Record Data*

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

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. Puerto Rico signed the SWIS Agreement with DOLETA, which incorporates all six WIOA core programs to exchange interstate quarterly wage records. Since January 1, 2020, all Queries for Wage Data for all applicable programs are 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.

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#### *(D) Privacy Safeguards*

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

The State complies with section 444 of the General Education Provision Act, section 2(c)(2) of the Rehabilitation Act of 1973, section 491-2(a)(2) of the Wagner Peyser Act, 2 CFR 200.303, OMB Uniform Guidance and any other applicable provision. It also complies with all relevant local provisions, including those identified by the Puerto Rico Institute of Statistics pertaining the access, dissemination and confidentiality of government information.

The PRIS Management Information System is a role-based system with specific permissions granted, depending on an individual's role. Confidential information is protected within the system by restricting access to view, enter, or edit data to specific security roles or specific security privileges. Access to the systems is granted by users with specialized administrative rights and administrative users' accounts are monitored periodically to ensure that rights have been granted to only appropriate staff.

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#### *(7) Priority of Service for Veterans*

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

Enacted in November 7, 2002, the Jobs for Veterans Act of 2002 (Public Law 107-288) has the main objective of "review and enhance employment, placement and training services offered to veterans." The Act requires that all workforce development programs, fully or partially funded by the USDOL, provide priority service to Veterans and, under certain circumstances, to spouses of veterans. Veterans and eligible spouses of veterans who otherwise meet the eligibility requirements for adult programs must receive the highest priority for services.

The PRDOLHR is committed to establish relationships with agencies that make up the One-Stop Workforce Development System, such as municipalities, consortiums, colleges and universities, public and private agencies, faith-based and community-based organizations, employer and labor union representatives to ensure and confirm priority of service. Priority of Service will be provided by Wagner-Peyser merit staff. The Veteran Program Coordinator (JVSGC) will be responsible to overview the compliance of Priority of Service by members of the Workforce Community.

A Strategic Plan will be implemented by Wagner-Peyser with an active participation of DVOPs/LVERs staff members who will meet with representatives of all of these organizations in order to achieve or review any agreements in place. The Strategic Plan will have the following goals in mind:

- Identify: veterans, veterans with disabilities, returning wounded or injured veterans, REALife-lines participants, transitioning service members and eligible persons;
- Promote employment of veterans;
- Promote training and education for veterans;
- Seek and coordinate support services for veterans; and
- Establish referral and service procedures.

Wagner-Peyser staff will continue to announce and provide priority of service to veterans according to Federal law and applicable regulations. Veterans entering to the the AJCs will be notified of their priority right of service under the Wagner-Peyser Act, as amended by WIOA. Once a customer is identified as a veteran, he/she will be provided special information designed for veterans only, and will be referred, when appropriate, to specially trained staff for intensive services. Local areas will continue to encourage the provision of additional priority services and information to veterans, including priority access to job orders and individual training accounts (ITAs).

As provided by law, the affected programs that must provide priority service includes, but are not limited to:

- Adults and Displaced Workers program under Title I of WIOA;

- All services offered under the Wagner-Peyser Act;
- All programs under the Trade Act;
- National Emergency Grants;
- Senior Community Service Employment Program (SCSEP);
- National Farmworkers Jobs Program (NFJP);
- H-IB Technical Skills Training Grants;
- Job Corps;
- Demonstration Projects under WIOA;
- Youth Opportunity Program;
- Youth Program under WIOA;
- Labor Market Information Formula Grants;
- Research and Development;
- Electronic tools in AJCs; and
- Other self-directed Internet-based services that use technology to assist individuals in accessing workforce development resources.

Under 20 CFR 1001.120, priority of service is applied to all employment services including:

- Registration;
- Interview with a Veteran Representative;
- Tests;
- Occupational Counseling;
- Job Search Workshops; and
- OJT Referrals.

All career centers inform veterans and eligible spouses of priority of service at initial contact and provides detailed information about priority of service and the range of employment, placement and training services available to them. If a veteran meets the definition of a Veteran with Significant Barriers to Employment as defined below, the veteran or eligible spouse is referred to a JVSG DVOP Specialist for the provision of services.

Also, as disposed by the USDOL Secretary, Veterans aged 18-24 are to be referred to a DVOP specialist for services. Veterans also receive reemployment services from career centers through a FY16 Reemployment Services and Eligibility Assessment (RESEA) program. RESEA provides focused case management services, including reemployment orientation, individualized career assessment, and job search assistance.

Wagner-Peyser staff will continue to announce and provide priority of service to veterans according to Federal law and applicable regulations. Veterans entering the ES offices will be notified of their priority right of service under the Wagner-Peyser Act, as amended

by WIOA. Once a customer is identified as a veteran, he/she will be provided special information designed for veterans only, and will be referred, when appropriate, to specially trained DVOP Specialists to receive intensive services. In order to be referred to a DVOP, the veteran or eligible spouse shall meet one of the following criteria:

- A special disabled or disabled veteran, as those terms are defined in 38U.S.C § 4211(1) and (3);
- Special disabled and disabled veterans are those: who are entitled to compensation
- (or who but for the receipt of military retired pay would be entitled to compensation)
- under laws administered by the Secretary of Veterans' Affairs; or, were discharged or
- released from active;
- Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who at any point
- in the previous 12 months has been unemployed for 27 or more consecutive weeks;
- An offender, as defined by WIA Section 101(27), who has been released from incarceration within the last 12 months;
- Lacking a high school diploma or equivalent certificate; or
- Low-income (as defined by WIOA at Section 101 (25)(B)).

For Priority of service purpose, the veteran definition is broad covering all persons that served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 USC 101(2). Eligible Spouse as defined at section 2(a) of the JVA (38 USC 4215(a)) means the spouse of any of the following:

- Any veteran who died of a service-connected disability;
- Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed for more of 90 days as missing in action, capture in line of duty by hostile force and forcibly detained or interned by foreign government or power; and
- Any veteran with a total disability from a service-connected disability evaluated by VA.

However, a spouse whose priority of service is derived from a living veteran or service member lost her priority of service if the veteran loses the status that is the basis for the priority or if she divorces from the veteran. The workforce system network in Puerto Rico, including Wagner-Peyser, and the general public is aware of the Priority of Service entitlement to veterans, covered persons and eligible spouses through announcements posted in the bulletin boards and near the entry service delivery point. In addition, Wagner-Peyser and AJC Staff are fully trained to identify covered persons at the reception desk and once in a while they ask the public if there is any veteran or spouse among the clients at the AJC.

Verifying Priority of Service Status through the required paperwork is not mandatory unless the covered persons will undergo eligibility determination or if the applicable federal program rules require the verification in site. Once Priority of Service is determined, covered persons move ahead of the line to receive the appropriate employment, training and placement services over the non-covered persons as required by law and as stated by VPL 07-09. Some Unemployment Insurance Offices have adopted this priority of service model from the Employment Service or the AJC although not mandatory by law.

Local areas will continue to encourage the provision of additional priority services and information to veterans, including priority access to job orders and individual training accounts (ITAs). Other steps that will ensure priority of service to veterans include:

- Training staff members;
- Periodic reception and Labor Exchange Staff reinforcement;
- DVOP/LVER immediate access to job opportunities;
- Placement of signs in waiting areas stating Veterans preference in all offices;
- A brief orientation (in the morning and afternoons) to clients waiting to be served at the reception area related to the priority to Veterans is offered;
- Distribution of printed informative material; and
- Data and Report Validation.

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#### (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 the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff

training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

As mentioned previously, 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.

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#### (9) Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The main language used in the provision of services throughout the system, in both printed and oral form, is the Spanish language.

## IV. COORDINATION WITH STATE PLAN PROGRAMS

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the unified or combined plan.

At the State level, Puerto Rico Unified State Plan was developed in collaboration and coordination with representatives from all core programs.

A WIOA Unified State Plan team was formed with the purpose of development and submission for approval, an integrated, aligned and actionable WIOA Unified State Plan. The Department of Economic Development and Commerce, acts as the implementation team lead, pulling together representatives from all core programs including Adult Education, Wagner-Peyser, and Vocational Rehabilitation.

The Governor's Workforce Development State Board approval of the WIOA Unified State Plan is requested at their full board meeting, which was held electronically due to the COVID-19 crisis.

## V. COMMON ASSURANCES

The State Plan must include assurances that:

1. **The Government of Puerto Rico** has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
2. **The Government of Puerto Rico** 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 **Department of Economic Development and Commerce**, the **Department of Labor and Human Resources** and the **Vocational Rehabilitation of Puerto Rico** reviewed and commented on the appropriate operational planning elements of the Unified State Plan, and approved the elements as serving the needs of the populations served by such programs;
  - a. **The Government of Puerto Rico** obtained input into the development of the Unified 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, other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified State Plan is available and accessible to the general public;
  - b. **The Government of Puerto Rico** 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;
4. **The Government of Puerto Rico** has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;
5. **The Government of Puerto Rico** 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);

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

## VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for WIOA core programs.

### (A) ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B.

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

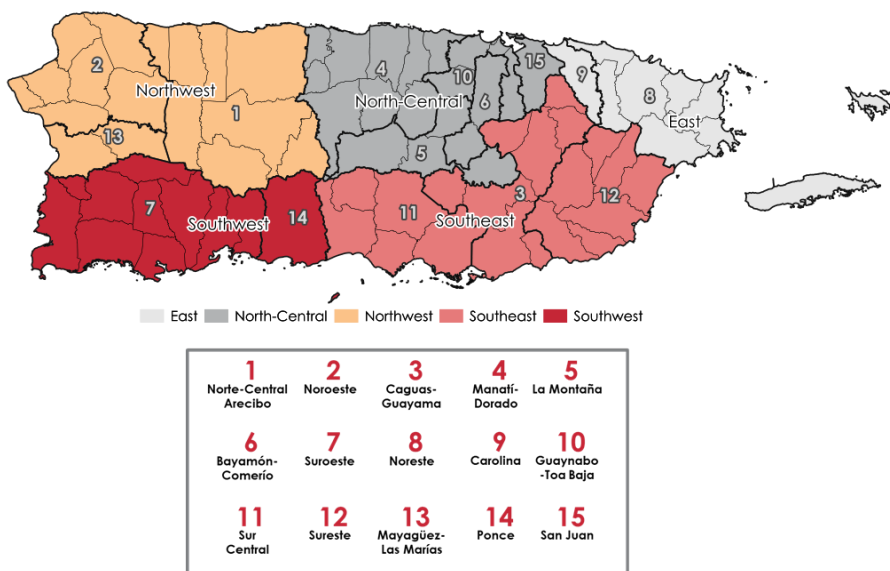
#### (a) General Requirements

##### *(1) Regions and Local Workforce Development Area*

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

In 2016, the governor identified five regions of economic development in the Island, according to the predominant economic activities at that time. However, although these five regions remain in place, the current government is evaluating the effectiveness of these regions under the new economic reality of Puerto Rico. A reorganization of the regions is being considered in order to adapt to the new trends of the labor market, the needs of the participants and to respond to an efficient system.

Figure 14. WIOA Regions and Local Areas



The main characteristics of the regions are:

- Northwest. The region is characterized by an industrial clustering in computer and information devices, aerospace, and agriculture.
- Southwest. The region is characterized by the concentration of industries in the sectors of agriculture, eco-tourism, hospitality and logistics technology.
- North Central. The region is characterized by an industrial clustering in pharmaceutical manufacturing, biotechnology, logistics technology, health services, research and development and medical tourism.
- Eastern. The region is characterized by the concentration of industries in tourism, and logistics technology.
- Southeast. The region is characterized by the concentration of industries in pharmaceutical manufacturing, agricultural biotechnology including crop research and development.

The Governor and the State Board shall establish public policy and guidelines to enable local areas develop regional plans. These will be presented to the State Board for evaluation and approval. The guidelines will consider the following topics, consistent with the objectives established in WIOA regulations:

- Technical assistance to local areas for carrying out the regional planning and service delivery efforts required under section 106(c);
- Alignment with regional economic development strategies adopted by the State;
- Integration of the economic development initiatives of local government consortia;

- Integration of industry cluster organizations, and the advancement of sector strategies and initiatives;
- Development of projects and activities for existing and emerging industries generating jobs opportunities;
- Collaboration with business and industry associations available in the region
- Agreement structure (MOUs) with consortia, clusters, business associations, academia, providers and other stakeholders in the workforce development systems;
- Conditions for strategic planning including evaluation of strength, weaknesses, and opportunities in the region, terms for the revision of the plan, among other parameters;
- Governance of the regional plan, in collaboration with the boards of mayors and participating local boards; and
- Integration of the local boards in the service-delivery model mandated by WIOA, including common intake, common outreach strategies and initiatives, universal service across the region, common performance measures (optional), identification of additional grants and fund opportunities, cost allocation plan, and MOU structure with required and optional partners, among other factors.

(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 State Board's Administrative Letter WIOA-1-2015, *Public Policy and Requirements for the Initial and Subsequent designation of local areas under WIOA*, establishes the process for considering the request of the initial designation of local areas for the administration of the funds allocated under WIOA. Additionally, the guidance establishes the directives that will govern the process of evaluation of an application for the subsequent designation as local area. Finally, it also establishes the circumstances and criteria under which the State Board may consider an application for re-designation of local areas that belong to a region of economic development or that seek designation as a single local area.

Under WIOA, the State Board has the power to recommend the designation of an entity as a local area. The State Board advises the Governor in matters relating to the workforce

investment system, including those related to section 106 of WIOA, as well as sections 20 CFR 679.200 to 679.290 of the proposed rule.

WIOA conceives a system centered on the customer, comprising both job seekers and employers, capable of anticipating and responding to the needs of regional economies. This requires that local boards and the Chief Elected Officials design and manage a regional system by aligning their services and policies with regional needs, and devising support strategies for the provision of services adapted to the demands of the economy.

The Governor, in consultation with the State Board, the Chief Elected Officials and the Local Boards will designate local areas as a condition for receiving the funds allocated to the Government of Puerto Rico under Title I of WIOA. In accordance with OE-2014-64, the PRDEDC is WIOA's Title 1 designated grantee, as well as the designated unit to provide administrative and operational support to the State Board.

The state regulations are being issued in compliance with sections 3 and 106 of WIOA, Act 171-2014, which transferred the WDP to the PRDEDC, and the Governor's EO-2014-64 that designated the PRDEDC as grantee, administrator and monitor of WIOA funds allocated to the State and established the State Board.

The State Board Administrative Letter WIOA-1-2015, also enacts public policy to guide the local area re-designation process. In summary, the transition process from a local area designated previously, to be initially designated as a local area under WIOA can occur using one of two methods:

- Automatic Designation. Under section 106(b)(2) of WIOA, the Governor must approve an application from the previously designated area for the initial designation under WIOA, provided there has not been a change in the composition of the local area; and for the 2 program years prior to the adoption of the approval of WIOA, the local area "performed successfully" (during PY 2012 and PY 2013), and complied with the criteria pertaining "sustained fiscal integrity".
- Discretionary Designation. After recommendation of the State Board, in accordance with section 106(b)(4) of WIOA, the Governor might approve an application of any unit of general local government, including a combination of those units, for its designation as local area under WIOA, if the State Board recommends and determines that the unit or units share a common labor market; share a same area of economic development; and have federal and non-federal resources, including education and training institutions appropriated for delivery service for the labor force.

At any time, the Governor might review the performance and outcomes of a local area to assess if it meets the requirements for its subsequent designation.

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

The Administrative Letter WIOA-1-2015, seeks to establish the process for considering the request of the initial designation of local areas for the administration of the funds delegated under WIOA, including the appeal procedures in case on an adverse determination regarding the application for a local area designation. Accordingly, a local area that understands that an adverse determination made with respect to its application of automatic or subsequent designation warrants revision, might submit to the state a reconsideration statement addressed to the State Board within a term of 15 calendar days after the date of receipt of the notification. The State Board shall issue a final determination within 15 calendar days after receipt of the review request. If a denial determination is issued, the PEE might file an appeal to the USDOL within 30 calendar days from the date of receipt of the notice of the determination of the State Board.

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

The State Board will develop public policy and adopt regulations regarding the appeal process applicable to determinations for infrastructure funding.

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## (2) Statewide Activities

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

**The Planning Guidelines** is the official document that sets the public policy and requirements for allocating local area funding for the Youth, Adult and Dislocated Workers programs. In compliance with WIOA regulations, priorities and goals the State planning will meet the needs of services of specific populations and minorities, as well as those of job seekers and employers. The annual Planning Guidelines compile the State and Federal public policies pertaining the management of WIOA funds. This Guide is designed to ensure compliance with ETA policies and goals, as stated in Training and Employment Guidance Letters (TEGL), Training and Employment Notices (TEN), WIOA Final Rules, as well as the State Board policies. Following are some of the items considered in the Planning Guidelines in relation to service delivery under WIOA. Please, for more details about State Policies and Procedures, refer to the Table 57: In-Process State Policies and Procedures.

(F) 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.
- **Dissemination of the State's list of Eligible Training Providers:** The WIOA Section 122(c) specifies that states must establish an application procedure for training providers and programs to maintain their eligibility and the eligibility of their programs. States in partnership with the local boards, the One-Stop system, and its partners play a leadership role in ensuring the success of the eligible training provider system. The module of the Eligible Training Providers List (ETPL), that is part of the PRIS, serves as an important tool for participants seeking training to identify appropriate providers and relevant information such as cost and program outcomes. Using the PRIS, career planners can assist participants in identifying training providers offering programs in high-demand industries that result in positive outcomes and recognized credentials. This system will provide up-to-date information about in-demand occupations, training programs that address the skill needs of employers, and information about available jobs and occupations.
- **Technical Assistance to local areas:** The State will publish and disseminate performance outcomes on a quarterly basis for all local areas. These reports allow the State and local areas to monitor performance outcomes in order to establish trends and identify measures requiring corrective action. The WIOA program staff will monitor performance, identify issues, and provide technical assistance, as needed.

Programmatic reviews ensure that workforce development system achieves quality program outcomes that meet the requirements and objectives of the

WIOA and federal and state regulations. Puerto Rico will continue to evaluate the effectiveness of local programs by conducting comprehensive programmatic reviews and oversight activities for the entire workforce development system. The WIOA programmatic reviews will provide guidance and direction to local programs in order to assist in providing quality workforce development services to our customers and provide a framework for continuous improvement efforts under the WIOA. Program reviews also offer the opportunity for disseminating information about effective program practices to the entire workforce development system. State staff will continue to conduct programmatic reviews to ensure effective grant monitoring and oversight utilizing a comprehensive set of monitoring and oversight activities, including on-site monitoring, quarterly desk reviews, and ongoing technical assistance and training.

Use of the DEDC Monitoring Guides by WIOA State Coordinators is required. In addition, Monitoring Guides are living documents that are updated regularly to reflect changes in law, regulation, and/or policy, as well as to include any improvements which will make the guides easier and more effective to use.

- **Evaluations:** The State will conduct evaluations and research projects on activities under the WIOA core programs to establish and promote methods for improving such activities to achieve high-level performance within, and high-level outcomes from, the statewide workforce system. 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. Evaluations will include analysis of customer feedback, outcome and process measures for the workforce investment system, as required.

In addition to funding the above-referenced WIOA activities, statewide activities funds are being used for those activities deemed most essential to the basic functions of the workforce investment system, including oversight of the local workforce investment boards and the WIOA programs. Statewide funds are being used to carry out the following allowable activities:

- **State Level Administration** includes the following functions:
  - Staff costs for program oversight and monitoring.
  - Participant Record Information System (PRIS) and related staff costs: The state uses a single integrated data collection system, known as the Participant Record Information System. This ensures that all local providers collect, report, and maintain the same data elements. In the next months,

DEDC is going to start a second phase aimed to achieve the integration and/or interface of some required partner's data systems.

- **Special Projects Funding:** Funds have been set aside for yet-to-be-determined special projects generated by DEDC. Special projects could include, but are not limited to, workforce and economic information and data needs, support for statewide planning activities around the WIOA, support for regional and local activities, surveys, evaluations. Funds may also be utilized to provide additional support for local boards operations, commensurate with the level of any remaining set aside funds.
- **Capacity Building and Professional Development Funds to our workforce development system:** To most efficiently and effectively utilize these funds to benefit the entire Puerto Rico workforce development system, funds are going to be allocated to support activities in addressing the goals of local strategic plans and the needs of local employers for a skilled workforce. Funds may be utilized for, but not limited to, supporting state and local partnerships to build equitable pathways to high-wage careers, enhancing system capacity to provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and developing and improving local program performance and goals through assisting ongoing system development and proficiency, including professional development and technical assistance.

### **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/mass layoff notices required under the Worker Adjustment and Retraining Notification Act.

Rapid Response is a key component to Puerto Rico's strategy to create a unified local approach while working with and providing a comprehensive array of services to employers. As a business service, Rapid Response will promote a full range of services available to help companies in all stages of the economic cycle. Early intervention facilitates a relatively quick and unencumbered transition to employment or training, following either a permanent closure or mass layoff, or a natural (or other) disaster resulting in mass job dislocation.

The State Unit for Dislocated Workers and Employers of the Workforce Development Program of DEDC is in charge of carrying out Rapid Response services and coordinates the Trade Adjustment Assistance Program (TAA). The State Unit has Rapid Response and TAA coordinators who have the responsibility to coordinate services to dislocated workers affected by mass layoff and plant closings. The Rapid Response process involves a



unification of state agencies and local service providers, together with the private sector and organized labor. The goal of all concerned parties is to provide dislocated workers with an array of support, resources, and technical assistance to effectively assist in the transition to reemployment. The RR and TAA State Coordinators participate in cross training of crucial re-employment and assistance programs and services most relevant to each local area or region. Subsequently, the RR and TAA State Coordinators acts as the link between the Local Workforce Development Boards (LWDBs), Wagner Peyser and Unemployment Insurance of the PRDOLHR, and applicable federal, state, and private resources to ensure all re-employment and supportive service information is readily available to assist employers and workers experiencing a mass layoff or plant closing.

The state has been developing a comprehensive rapid response and TAA procedures, that will be continuously reviewed for improvement, to serve impacted employers and workers using the Rapid Response, and TAA Programs. In order to provide thorough and complete delivery, the procedures will provide a special emphasis to business engagement and layoff aversion services.

The Rapid Response team begins the process by interacting with companies that have, or plan to, lay off workers. Information regarding the WIOA Dislocated Worker and TAA Programs are provided to the company, and if applicable, union officials at this early stage. Worker meetings are planned at this point to discuss the available workforce programs in more detail.

In addition to acting as a facilitator and resource of re-employment resources, the TAA and RR State Coordinators thoroughly documents dislocation events, allowing for trend analysis and proactive strategy development, organizes necessary communications and aligns relevant services to support affected workers. The aforementioned strategies are all part of a demand-driven system and a key component of a comprehensive layoff aversion strategy.

(G) 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 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.

Under this waiver allowance, permitted WIOA statewide fund use includes, but is not limited to:

- Expedient 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 687.100(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.
- 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 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.

- Supportive services may be provided to enable individuals to participate in disaster relief employment, 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 as well as appropriate adults and youth ages 18 and over.

The waiver request is under consideration of the USDOLETA.

(H) 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, expected to be approved by May 2020, 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).

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## (b) Adult and Dislocated Worker Program Requirements

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### (1) Work-Based Training Models

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

Work-based training is employer-driven with the goal of unsubsidized employment after participation. Generally, 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.

The WIOA State Workforce Development Board is in the process of approving a Work-based Training Policy at state level. Nevertheless, the LWDBs are required to have a local policy in place that includes a strategy for providing work-based training services. Local training policies and contracts are reviewed during the 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 LWDBs 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 primarily designed to first hire the participant and provide the participant with the knowledge and skills necessary for the full performance of the job. The OJT is a critical tool that can help job seekers enter into successful employment. The term “on-the-job training” means training by an employer that is provided to a paid participant while engaged in 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.

Prior to approving an OJT, the local area must assess the potential participant to ensure suitability for the training. The assessment, at a minimum, shall include the relevant occupation’s specific skill requirements, the participant’s academic and occupational skill level, prior work experience and the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The IEP must reference the lack of skills and the need for OJT. The results of the assessment will be used, in part, to determine the appropriateness of and suitability for the OJT, along with determining the duration of the training.

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 or 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.

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## (2) Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy and services.

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 several mechanisms. Given the unique nature of Registered Apprenticeships, there are several ways in which training services will be used in conjunction with these programs:

- 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.

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### (3) Training Provider Eligibility Procedure

Provide the procedure 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. The biennial 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.

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(4) Priority for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient

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

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.

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 in the next weeks. All new policies have to be in place on July 1st, 2020.

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.

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(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.

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(c) Youth Program Requirements

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

- (1) Identify the State-developed criteria to be used by local boards in awarding grants 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.

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.

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.

(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, 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.

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).

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.

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.

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#### (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 also include:

Not applicable.

- (1) Any comments from the public comment period that represent disagreement with the Plan (WIOA section 108(d)(3)).



Not applicable.

- (2) The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State (WIOA section 108(b)(15)).

Not applicable.

- (3) The type and availability of WIOA title I Youth activities, including an identification of successful providers of such activities (WIOA section 108(b)(9)).

Not applicable.

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#### (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.

On June 12, 2018, the U.S Department of Labor approved the waiver request of certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA). This action was taken under the Secretary's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8 - 10 of the Wagner-Peyser Act in WIOA Section I 89(i). Puerto Rico workforce development system has seven (7) waivers approved until June 30, 2020. We are request an extension of the following waivers for the 2020-2023:

1. 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. **(Refer to Appendix A)**
2. Waiver of WIOA Section 134(d)(5) to allow up to 50% percent of Adult and Dislocated Workers funds to be used for the provision of transitional jobs. **(Refer to Appendix B)**
3. 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 out-of-school-formula funds on youth workforce activities for out-of-school youth (OSY). **(Refer to Appendix C)**
4. Waiver of statewide required activities described in WIOA Sections 129(b)(1)(A) and 134(a)(2)(vi) to conduct evaluations under section 116(b) of activities authorized under this chapter and chapter 3 in coordination with evaluations carried out by the Secretary under section 169(a). **(Refer to Appendix D)**
5. Waiver of Workforce Innovation and Opportunity Act, or WIOA. Section 134/(a) Statewide Employment and Training Activities. **(Refer to Appendix E)**
6. Waiver of the limitation on the use of funds for capitalization of business under WIOA 181 (e) to allow funds to be used to capitalize small business, up to \$5.000 per affected business. **(Refer to Appendix E)**

## TITLE I-B ASSURANCES

- (1) **The Government of Puerto Rico** has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients or basic skills deficient;
- (2) **The Government of Puerto Rico** has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
- (3) **The Government of Puerto Rico** has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
- (4) **The Government of Puerto Rico** established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);
- (5) **The Government of Puerto Rico** has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;
- (6) **The Government of Puerto Rico** established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;
- (7) **The Government of Puerto Rico** will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
- (8) **The Government of Puerto Rico** distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;
- (9) **The Administration of Vocational Rehabilitation** cooperates with **the Department of Labor and Human Resources**, and **the Department of Economic Development and Commerce**;
- (10) **The Government of Puerto Rico** agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
- (11) **The Government of Puerto Rico** 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).

## VII. WAGNER-PEYSER ACT PROGRAM (EMPLOYMENTS 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 sub-recipient, or some combination thereof.

The Wagner-Peyser Act (WP) Staffing Flexibility Rule (included in Federal Register Volume 85, No. 3 of January 6, 2020, to amend the provisions of 20 CFR Parts 651, 652, 653 and 658) is undoubtedly a very important new work tool for the Puerto Rico Department of Labor and Human Resources' (PRDOLHR) Employment Services Division (ES).

Given the difficulties and challenges resulting from the implementation of PROMESA (Public law: 114-187), and the various fiscal restrictions applicable in Puerto Rico since 2016, PRDOLHR have been experiencing (as well as other agencies) delays or prohibitions in the recruiting process of the much needed vacant staff positions paid with federal funding, such as ES staff, which are currently under a local hiring freeze. Given the various options and the flexibility granted by this new rule, PRDOLHR understands the importance of studying in detail how it could be implemented to cover the vacant positions within ES staff. For purposes of this four-year plan, PRDOL does not expect to be able to implement it during FY 2020, since this is an election year and it will require interagency collaboration and governmental approval. However, for FY 2021 and after, PRDOLHR expects to be able to develop a plan, with the technical assistance of ETA, and to implement the same as soon as practicable thereafter. The potential agreements with sub-recipients, as well as other combinations permitted under the new flexibility rule allows for great improvements in service delivery and enhanced performance.

For the time being, labor exchange services and all ES services will continue to be provided with WP and State merit staff, and through the use of technological tools, and to the extent possible, in collaboration with local entities. As soon as a definitive plan for implementation of WP flexibility rule is ready, Puerto Rico will amend the State Plan accordingly, and comply with any applicable local or statewide requirements to permit its implementation.

(2) Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.

Consistent and strategic investment in ES staff development reflects Puerto Rico's commitment to integrated workforce services. PRDOLHR -ES staff is trained in both employment services and UI programs, enabling customers to receive seamless services geared to facilitate their return to employment. However, for the success of the implementation of the Workforce Innovation Opportunity Act (WIOA), it is of the outmost importance and essential that the skills and competencies of the WP staff be reviewed and re-engineered to respond to recent programmatic changes in WP. Our ES staff is the most important asset in the delivery of quality services in a prompt and efficient manner.

WP staff is co-located at the AJCs. Achieving this milestone is the key to the success of WIOA in the provision of career services to job seekers. For this change to become more successful, WP staff members will continue to be trained on how to better serve within the AJCs, how to use the new WIPS system (integrated technology tool under development) and to help them understand the reasons that make a change in the way services are rendered to improve and streamline the processes. For this, ES staff will continue participating in reengineering and capacity building processes, which are expected to ultimately result in successfully meeting customers' needs and achieving measurable program goals. This means that a consistent and strategic investment in ES staff development continues to be needed as a reflection of the Puerto Rico's commitment to fully integrate workforce services. ETA's tools, trainings, conference calls, webinars and guidance are and will continue to be a primary source of training our ES staff.

WP staff has been and will continue to be subject to intensive capacity building efforts regarding the new challenges and demands that WIOA requires from the workforce delivery system. WP will continue consulting with ETA and professionals in the Employment Counseling field to better serve our customers. An integral part to this approach is to provide them with the competencies and skills necessary to understand the essential role that technology plays in provision of career services to job seekers today, and how essential is a seamless integration of service provisions to customers in the AJCs.

It is necessary then, to continue training existing staff currently providing direct services to Federally designated high priority populations, such as veterans and eligible spouses, UI claimants more likely to exhaust their benefits, including UCX, and other special target populations identified as in need of career services such as agricultural workers (MSFWs), with the skills and tools necessary to provide such services.

## **The Workforce Professional**

Since the implementation of WIOA in 2014, ways of doing business have changed drastically. As a result, employment counseling in the ES began to evolve to accommodate this transformation and the implementation of the concept of service delivery through the AJCs.

The requirements to provide employment counseling services should no longer be based primarily on the formal education of the WP professional staff. A determination regarding the staff ability to provide advice or counseling should be considered and shall include past work experiences, current job requirements, current and past job duties and skills required by State regulators.

## **Employment Counseling**

In Puerto Rico, skills and qualifications to provide occupational or employment counseling is regulated by law, and counseling is within this professional field. ES has among its support staff, Occupational Counselors certified in their field with a master's degree as case managers who work directly with different populations seeking employment such as veterans, UI claimants more likely to exhaust their benefits, including UCX and others.

Counseling services were introduced for the first time by the WP Act of 1933 with specific guidelines that such counseling services shall be provided to people with disabilities. Subsequently, the provision of these services to other groups identified with special needs became a requirement.

WIOA states that funds allocated to each state must be used to provide services to job seeking persons, including among other services, counseling. WIOA Section 102 requires the Unified State Plan to provide for the promotion and development of employment opportunities for people with disabilities, for their guidance and insertion in the labor market, and for the designation of at least one person in the ES whose functions will be directed to these purposes.

Employment counseling is defined as the process by which a WP Workforce Professional and the job seeker work together as a group and/or in individual activities, so that the job seeker may obtain better knowledge and understanding about the labor market and a have a more realistic approach when selecting, changing and adapting to a career, profession or a job.

The WP staff has the responsibility of providing direct services to target populations as defined by the USDOL as high priority, such as veterans and eligible spouses, UI claimants more likely to exhaust their benefits, including designated UCX, and other populations in

need of career services such as farm workers, with the skills and tools necessary to enable them to achieve their goal of obtaining suitable employment according to their needs, skills and educational level.

For WP staff to comply with this responsibility as stated above, at a minimum, it is recommended they attain the minimum competencies in order to provide, in an effective way, all the career services required under WIOA. The following competencies are to be adopted to be used in AJCs and WP:

- 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.
- 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.
- 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 AJCs.
- 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.

- Development and Use of Labor Market Information. 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.
- 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.
- Development and Implementation of an 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 handle cases through placement and retention.
- 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.
- 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 AJCs.
- 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.



- 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.
- 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.

Consistent and strategic investment in staff development reflects Puerto Rico's commitment to integrated workforce services. ES enables job seekers to receive seamless services geared to facilitate their return to employment. However, to successfully implement and provide those services, it is of the utmost importance and essential that the skills and competencies of the WP staff be continuously reviewed and re-engineered. WP staff is the most important asset in the delivery of high-quality services in a prompt manner. WP staff at the AJCs is a key element for the success of WIOA in the provision of career services to job seekers. WP staff, as a Workforce Professional, must understand they must work differently, they must participate in reengineering and capacity building process and ultimately derive pride and satisfaction from successfully meeting job seekers needs and measurable program goals. For this to occur, a consistent and strategic investment in staff development needs to occur as a reflection of the Puerto Rico's commitment to integrate workforce services and to attain the above professional development.

We are committed to continue provide intensive capacity building to WP staff for them to understand the new challenges and demands that WIOA on the workforce delivery system, including but not limited to:

1. Continuing Education: Courses and workshops, pursuing certificates, accreditation or other credentials through educational programs.
2. Participation in professional organizations: Attending local, regional, national, and international meetings, conferences and workshops sponsored by professional organizations; serving as an officer, board member, or committee member; coordinating events sponsored by the Employment Service and/or the AJC.
3. Improve Job Performance: keeping up with technology, systems, processes; learning about new developments in your field; improving existing skills.
4. Increased duties and responsibilities: taking on new challenges in current position, projects, long or short-term assignments.

An integral part to this approach is to provide the competencies and skills necessary to the WP staff and to understand the important role that technology plays in provision of career services to job seekers today. To obtain this, the following approached will be use, but not limited to:

1. Skill Based Training: By providing effective skill-based training staff will learn conceptual information or necessary behaviors, practice learning the new information or behaviors, and receive feedback on their performance.
2. Job Assignments: Learning by Doing; working on real problems and dilemmas, adding new responsibilities to an existing job, stretching staff, pushing them out of their comfort zones that requires them to think and act differently.
3. Developing relationships: Learning through interaction with others. By investing in professional development we will be motivating the WP staff to invest in the workforce system goals, be excited about overall successes, and feel motivated to improve provision of services to job seekers and to contribute to the AJCs workplace culture and be an active part of the workforce professional's community. This continuous professional development will help staff to not only be competent in their responsibilities as a workforce professional, but also excel in it. Actively pursuing professional development ensures that knowledge and skills stay relevant and up to date. It also allows WP staff to be more aware of changing trends and directions in the workforce system.

Professional development will include also the training of WP staff in the provisions of the American with Disabilities Act of 1990, regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials, for individuals with disabilities to support the needs of individuals with disabilities.

The ES is currently exploring with professionals in the field of Employment Counseling, ways to develop workshops and training courses that will provide the skills and competencies described above to WP professional staff who serves as Workforce Professionals so that they are familiar with the expectations of a workforce professional to provide a quality experience for job seekers visiting the AJC.

Our goal is to have a complete structured training curriculum aligned with the NECA competencies mentioned above to equip them with the necessary tools to provide high-quality services to both jobseekers and business such as:

- Intensive interviewing techniques;
- Administering career assessments;
- Accessing and interpreting labor market information;
- Customized service strategies for employers and jobseekers;
- Identifying the potential need for soft skills and skills gap training;

- Developing workforce partnerships;
- Identifying available supportive services;
- Résumé writing expertise;
- Counseling to address barriers to employment and to assist with career selection;
- Strategies for business recruitment events;
- Methodologies to connect qualified jobseekers with employers;
- Providing workforce statistics and prevailing industry wages;
- Guidance on employment laws as it relates to the workplace;
- UI the WOTC, other workforce services; and
- Access to customer service training to enhance services to jobseekers and businesses.

In addition to the competencies mentioned above, other staff development activities may include:

- Comprehensive online resources on PRDOLHR website at [www.trabajo.pr.gov](http://www.trabajo.pr.gov);
- Comprehensive training on external online resources such as [mynextstep.org](http://mynextstep.org) and [myskillsmyfuture.org](http://myskillsmyfuture.org);
- Job shadowing for new staff at State and local offices;
- Handbooks and manuals;
- Mentoring;
- Community practice resources;
- Active participation in NASWA;
- Ongoing assessment of PRDOLHR and partner staff training needs by local PRDOLHR career center managers;
- Participation on LWDBs to keep abreast of information on local, State, and national issues;
- Comprehensive online resources on the Employment Service Intranet using MS SharePoint technology;
- As well as strategic counseling and improvement of delivery of service skills through seminars and counseling by expert third parties to be contracted by PRDOLHR.

### **The Economic Crisis: The Impact on the Provisions of Employment Services**

As all other programs federal or local, WP has been impacted by the recent unprecedented fiscal crisis of Puerto Rico, and at the diminishing federal funding assigned each program year. This situation has partially impacted the ability to recruit new staff to provide all required services available under WIOA for career and employment of job seeking persons. Therefore, not all ES local offices at the AJCs have the appropriate level of WP staff to provide services to job seekers in need of them. The

flexibility rule, once implemented, will be instrumental in surpassing this challenge. At the same time, PRDOLHR is making efforts and has been successful in filling vacancies such as that of the State Monitor Advocate. Not all ES Local Offices have a Career Counselor within its staff. PRDOLHR continues to work towards being able to recruit these positions, or to use the WP flexibility rule.

It is necessary to continue to train existing staff providing direct services to federally areas designated as high priority populations, such as veterans and eligible spouses, UI claimants more likely to exhaust their benefits, including UCX and other special target populations identified as in need of career services such as agricultural workers (MSFWs), with the skills and tools necessary to provide such services.

ES is currently exploring with professionals in the field of Employment Counseling ways to develop workshops and training courses that will provide the skills and competencies described above to WP professional staff who serves as Employment Specialists so that they are familiar with the expectations of an employment specialist and can provide a quality experience for job seekers visiting the AJCs.

- (3) Describe strategies developed to support training and awareness across core programs and 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.

Aware of the need to offer better services, ES/UI will provide cross training, technical assistance and support to all core partners staff who serve local job seekers and employers to ensure that program partners are highly engaged in local and State workforce partnerships that allow for the constant exchange of information on core programs, UI legislation, and available programs and to integrate these programs into the customer flow within the AJCs. ES will continue providing cross training on services provided by WP to veterans, UI claimants, MSFWs and job seekers in general. Also, cross training is provided in areas such as the WP Complaint System, the Agricultural Recruitment System (ARS), refocusing of the Jobs for Veterans State Grants (JVSG) and the impact it has on the provision of services by WIOA partners, Reemployment Services and Eligibility Assessment Program (RESEA, UI policies, rules, procedures, detection addressing and resolution of UI issues affecting UI eligibility.

### **Identification of Unemployment Insurance (UI) Eligibility Issues**

Under the grant requirements for the Reemployment Services and Eligibility Assessment Program (RESEA), a complete review of UI eligibility is performed under the Eligibility Review Program (ERP). Section 303(a)(1) of the *Social Security Act* (SSA) requires "management methods ...as it is determined by the US Secretary of Labor as reasonable

to ensure full payment of unemployment compensation at the due date". This means the implementation of procedures and policies for UI eligibility information by ES and/or WIOA staff in order to quickly identify UI eligibility issues and the correspondent referral to UI staff for proper adjudication under state UI law. To ensure that ES meets the needs of UI, policies and procedures are in place to define and timely provide the required information relating to the requirements regarding participation or availability of a claimant.

UI claimants referred to RESEA will be subjected to this eligibility review as part of their participation in RESEA. However, all UI claimants not referred to RESEA and receiving of employment services will be subjected to the same eligibility review by WP staff as part of the initial assessment. These services will be provided by WP state's merit staff. WP/RESEA staff will review WP/RESEA participants who have completed appraisal interviews and will refer them to UI for adjudication as appropriate.

A key element in developing more useful tools will be sought and put into effect once the new WIPS (integrated WIOA partners' program) is fully operational. Trainings for this new program will entail training towards maiming the system's capabilities of streamlining the referral process and provide a smooth service to the participants.

#### (B) ASSISTANCE TO INDIVIDUALS FILING A CLAIM FOR UI THROUGH AJC

Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through AJCs, as required by WIOA as a career service.

Consistent with the requirements that PRDOLHR takes an integrated approach to its reemployment strategy to strategically coordinate resources and activities serving the unemployed community, the RESEA program is being integrated and workflow redesigned in all AJCs and with UI to better serve their needs.

Puerto Rico meets the needs of individuals requesting assistance in filing UI claims by providing direct in-person customer assistance and guidance in all its local offices and all AJCs, through a call center and through web based interface, and are trained to assist individuals in completing application for UI benefits through the UI state agency via Online Services Portal or telephone, along with information regarding the UI Program. Every individual will have the ability to file a UI claim at each AJC. In order to provide this access and the meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through the AJCs, assistance will be assured through:

- UI orientation provided to every new claimant explaining the full range of workforce services available to help them return to work by WP merit staff and/or duly trained WIOA staff.
- Online access via <https://desempleo.trabajo.pr.gov/reclamacionsubsiguiente/> where customers can file electronically from career centers, home, libraries or any other Internet portal. Through telephone at 787-945-7900 (initial claim and subsequent by IVR), in PRDOLHR local offices and all AJCs.
- Fully staffed resource centers at all career centers, including Internet access, copies, phones, fax and resource libraries.
- Access points at AJCs and career centers across the State.
- An opportunity for each claimant to access in-person reemployment services as they come to career centers and AJCs 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.

PRDOLHR is aware that the UI claims assistance must be “meaningful”. For that purpose, PRDOLHR is making efforts to comply with Program Letter 14-18 and WIOA.

### (C) REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

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

Puerto Rico is positioned, along other partner's staff, to provide comprehensive employment and placement services to jobseekers who are most in need and face multiple barriers to reemployment. All employment, training and placement services are available to all job seekers walking in to AJCs on a customer-centric approach for the deliverance of services, aligned with WIOA, for providing reemployment assistance to UI claimants (job seekers) as long they are eligible to work in the United States including, but not limited to:

- Directing UI customers, that are required to seek work, to register in the state work search system PRNLX.

- 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 AJCs 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 AJCs 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 AJCs such as self-assessment, information on education and training, interviewing techniques, networking, occupational exploration, and online resources, among other services.
- Development of and 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 résumé 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 for UI claimants has a high relevance during recessions and periods of high unemployment. As a result, ES will focus its attention and resources to continue better integration and UI service connection with the services provided through the AJCs under WIOA. The goal is to ensure that UI seekers have access to the full range of employment services and training through the AJCs while ensuring that claimants meet the requirements for active participation in the job search as a condition to continue receiving benefits.

All WP services are staff assisted services although any job seeker has access to other services provided by the center 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) received more in-depth career services to further their career goals.

Reemployment Services (RES) arises as an amendment to the *Social Security Act (SSA)*, PL 103-152, *Unemployment Compensation Act Amendments* of November 24, 1993 and after. This law added Sections 303(a) (10) and 303(j) to SSA. Profiling is designed to assist UI claimants who may be unlikely to find employment before their benefits are exhausted. All claimants identified by the profiling model system are mandated to participate in required RESEA services and shall complete a comprehensive objective assessment and a reemployment plan.

RESEA is of high priority for the USDOL. With the new RESEA program enacted into law, new challenges are before us to better serve UI claimants so they can return to the labor market before exhausting their UI benefits. This call for the establishment of service strategies that work and based on evidence. Several studies have found that when attention is placed on the job search efforts of UI claimants and their reemployment needs, these translate into fewer erroneous payments and shorter claim periods. WPRS/RESEA initiatives seek to address both priorities.

#### (D) USE OF W-P FUNDS TO SUPPORT UI CLAIMANTS

Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

- (1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

The WP Labor Exchange System is administered by the PRDOLHR. Currently, all UI claimants (job seekers) are required to register into the state's labor exchange system, PRNLX, and create a resume. Once registered, job seekers have access to all of the online features, such as: searching for jobs, identifying employment trends and occupational information, using the virtual recruiter to automatically receive alerts of new jobs that match the job skills in their resume, and having their resume viewable by employers registered in the system.

All AJCs have a resource center where job seekers can conduct self-service activities by using resources such as computers and phones to conduct job searches and create a resume through PRNLX, respond to employment opportunities, manage their UI claim through the PRDOLHR website, etc. In addition to self-service options, claimants can also receive staff-assisted services, such as job search workshops, assistance with access and navigating the PRNLX system, 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 ES job seekers including UI claimants.

Both UI and WP program representatives will be party to the MOU negotiations with the 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 of these programs.

In summary, PRDOLHR will use WP funding to support the reemployment and related services to UI claimants. Among the various initiatives, PRDOLHR will continue to provide labor exchange services for UI claimants (expected to be expanded with the new WIPS system expected to be fully operational in April 2020).

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

UI claimants are required by state law to register with the employment service (ES) as a requirement to be eligible to receive UI compensation. Once UI claimants filed their claim, either in person, by phone or by Internet, they are required to visit the nearest career center and register with ES. The claimant has the burden to register with ES. Once registered, a white card (Form 506) is given to the individual as proof of his/her registration. The card has a unique customer ID assigned by PRIS in order to be valid. Every time the claimant is in need for UI services, he/she needs to present the card to the UI representative as an evidence of his/her registration in ES since UI representatives do not have access to the PRIS system.

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

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 established since 2012 that if an individual earned the majority of wages in the base period used to establish the claim from part-time work, the individual would be allowed to restrict their work search to 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 of time 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 are able, available, and actively seeking employment. A negative r 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 program. During the in-person appointments, a UI eligibility review is performed and the RESEA interviewer question the individuals about availability for work and any barriers to work they may be facing during all contacts. During all eligibility reviews (i.e., UI, RESEA), staff review the individual's work search, discuss the individual's availability, and any barriers to work.

ES Placement Officials 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 claims 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 secondary work test is done through ES at the one-stop-centers. If a UI claimant walk-in into an AJC for employment and/or placement services, ES staff will perform the work test and is directed to contact the UI adjudication unit when they become aware of UI claimant's refusal of suitable employment or failure to attend scheduled interviews.

(4) 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 is almost done. This integration will allow for the orderly provision of services to job seekers and the provision of referral to and application assistance for training and educational programs and

resources. It is of utmost importance to WP to coordinate the integration of these services which is a primary goal under WIOA. This will bring together the core programs to provide the whole range of services in a seamlessly integrated and coordinated manner to individuals seeking services at the career centers. These will be providing information to job seekers on community resources, labor market information, GED, occupational training, OJT, and support services that make training possible to enhance an individual's ability to return to work. The network will work as the "front door" to the workforce system. WP staff from career centers will assume their functional roles in the workflow having the responsibility to i job seekers' needs, assist 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 other services not provided by WP. This will serve as an access point to inform UI customers about other WIOA Title I 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.

#### (E) AGRICULTURAL OUTREACH PLAN (AOP).

Each State agency must develop an AOP every four years as part of the Unified State Plan required under sections 102 or 103 of WIOA.

- (1) Assessment of Need. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The Agricultural Outreach Plan (AOP) details the activities planned for providing a full range of employment and training services to the agricultural community, and outreach to Migrant and Seasonal Farmworkers (MSFWs), who are not being reached by normal intake activities conducted by Employment Service local offices, H-2A foreign guest workers as well as Agricultural employers for the period of July 1, 2020 to June 30, 2023. It is also prepared in accordance with WIOA proposed Section 167 and Unified Planning Guidance.

Under WP, as amended by WIOA, PRDOLHR is responsible for the development of specific strategies to ensure the proper provision of services to MSFWs through the AJC's, in a manner that is quantitatively proportional and qualitatively equivalent to those provided to non-MSFWs. Additionally, included is a full description of how services will be delivered to Agricultural employers to ensure that their labor supply needs are met by reaching

and placing the available domestic workforce. The PRDOLHR is also committed to ensuring that H-2A foreign guest workers and domestic farmworkers are aware and fully understand their rights and become familiarized with labor laws established to protect them.

Puerto Rico continues to be a designated significant MSFW State due to the large number of farmworkers reported as participants in the WP program as recorded in the current Labor Exchange Reporting System (LERS) 9002A report. The territory remains very active as a significant provider of workers for a dozen states and recurrently processes hundreds of Agricultural employment orders through the H2A and ARS systems, resulting in placement of eager MSFWs who year after year look forward to their pick seasons. However, many MSFWs from PR continue to face substantial challenges in their effort to secure agricultural jobs in the United States due to discriminatory practices of some H-2A employers, who tend to require experience tailored to the specific crops rather than seeking the skill set required for the tasks described on the job order.

As in many other states, Puerto Rico farmworkers, including MSFWs, have similar needs to immigrant and low wage worker populations. The following are some of the most common needs identified in the MSW population of PR:

- Lack of flexibility in their working hours which precludes them from accessing basic services, as agricultural work hours do not coincide with typical business hours;
- Extremely low wages due to a lack of Agricultural Surveys that could determine if the current prevailing wage meets at least the minimum wage requirement;
- Poor access and/or assistance with transportation not only to their workplace but also to basic services such as health, legal counseling and education;
- Lack of coordination of assistance to access educational development opportunities, as many appear to lack basic skills;
- Lack of resources and support system to find work in agriculture by word-of-mouth, friends and family within their neighborhood;
- Lack of young farmers and that 65% of the island's agriculture workforce is over 55 years of age. The decrease in new farmers will have significant negative effects on the island's agriculture in the coming decades;
- Lack of knowledge and proper training to protect themselves of workplace hazards;
- Discriminatory practices in the hiring process reducing their chances of obtaining employment;
- Low educational level, some totally illiterate;
- Lack of basic communication skills in English which precludes them from seeking employment offered by US employers; and

- Limited or poor conditioned housing facilities near their place of employment.

PRDOLHR will continue its commitment in assisting MSFWs to overcome these challenges 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 them.

- (2) 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 prior reports, it was estimated that Puerto Rico had 584,988 acres of cropland, with a total value of agriculture sales at approximately \$548 million. However, those figures may no longer be considered accurate after the multiple natural disasters that devastated the territory between 2017 and January 2020. It is well known that while Puerto Rico was already struggling to cope with an extraordinary economic crisis, the entire territory was hit by two hurricanes in 2017, causing an unprecedented devastation and completely transforming not only the agricultural panorama, but also the overall way of living for the entire population.

On September 24, 2017, Hurricane Maria devastated over 80 percent of all the island's crops and severely damaged the island's dairy industry as well as the banana, plantain and coffee plantations. Prior to the natural disasters of 2017, Puerto Rico imported 85% of all its food and local agriculture supplied 15% of the remaining food items consumed in the territory. After Hurricane Maria, Puerto Rico has a 12% capacity of consumption. However, the food imports have increased to about 90% of all food items consumed by the ever-changing population. The agriculture in Puerto Rico impact is: 0.8% (2017 est.) Puerto Rico food crops impacted by this natural disaster include coffee, bananas, plantains, pineapples, tomatoes, avocados, cacao, spices, corn, mango, beans, peppers, yams and others.

Top five labor intensive crops, among others:

**Table 59. USDA Census Agriculture 2012 and Estimate Loss**

Products	2012 (USDA Stat)	%	Local Food Production After Hurricane Maria	2012 (USDA Stat) After Hurricane Maria	Estimated Loss

Milk	\$189,400,000.00	35%	3.00%	\$37,880,000.00	(\$151,520,000.00)
Plantain	\$80,500,000.00	15%	3.00%	\$16,100,000.00	(\$64,400,000.00)
Vegetables and Melons	\$47,100,000.00	9%	3.00%	\$9,420,000.00	(\$37,680,000.00)
Poultry and Eggs	\$40,400,000.00	7%	3.00%	\$8,080,000.00	(\$32,320,000.00)
Nursely and Greenhouse	\$37,500,000.00	7%	3.00%	\$7,500,000.00	(\$30,000,000.00)
Other Agriculture Business	\$152,700,000.00	28%	3.00%	\$30,540,000.00	(\$122,160,000.00)
<b>Total:</b>	<b>\$547,600,000.00</b>		<b>\$109,520,000.00</b>	<b>(\$438,080,000.00)</b>	

Source: USDA Census Agriculture 2012 and Estimated Loss of 80% after Hurricane Maria.

The coffee industry remains among the top ten agricultural commodities in order of economic importance in Puerto Rico. Before the hurricanes hit, there were about 10,000 coffee growers, of whom the vast majority were small and medium producers. Coffee growers were distributed in 22 municipalities in the central west region. The main municipalities engaged in the production of coffee were: Adjuntas, Jayuya, Lares, San Sebastian, Añasco, Guayanilla, Mayagüez, Orocovis, Ponce, San Germán, Ciales, Las Marías, Maricao, Utuado, Juana Diaz, Moca, Peñuelas, Villalba, Sabana Grande and Yauco. Hurricane Maria destroyed 85 percent of coffee farm harvests when it ravaged the island in September 2017, according to the Secretary of the Puerto Rico Department of Agriculture (PRDOA), Carlos Flores Ortega. Right before the storm, farmers were expecting the best harvest in 10 years, said Flores Ortega." – NBC News.

According to the 2012 USDA Agricultural Census, which is the only currently available data at this time, (statistics for Puerto Rico 2017 Census are due to be released in June 2020), the agriculture industry in Puerto Rico is responsible for approximately 30,122 jobs on a permanent or temporary basis.

Recent studies have suggested there is a lack of young farmers and that 65% of the island's agriculture workforce is over 55 years of age. As this trend continues its natural progression, the aging of our active agricultural employers, paired with a noticeable decrease in new farmers will have a significant negative impact on the island's agriculture in the coming decades.

Table 60. USDA Census Agriculture 2012

Category	Producers	%
35 to 64 Years	7,917	60%
65 years or Older	4,735	36%
Under 35 Years	507	4%
Total:	13,159	100%

Source: USDA Census Agriculture 2012.

At the time the last AOP was submitted, the Government of Puerto Rico was in the process of establishing very ambitious projects aimed to usher a new era of investment in the agricultural industry. Multiple initiatives were launched to revamp farm activity such as reestablishing traditional crops such as sugar cane and rice and increasing the acreages dedicated to the production of coffee. The PRDOA offered an array of incentives to agricultural employer to acquire farm supplies and equipment, provided subsidies and offered tax breaks resulting in more than 2,000 new farms been established. However, with the approval of PROMESA in 2016 new fiscal constraints are in effect and many incentive programs are under review by the Supervisory Board named under PROMESA.

According to PRDOLHR's statistics, as of 2016, the total number of workers (not seasonally adjusted) was 21,000, revealing an increase in total workers with respect to prior years. However, that trend ceased suddenly as a result of the economic crisis experienced in Puerto Rico and aggravated by the natural disasters that followed. The same statistical report for agricultural employment (not seasonally adjusted) for the month of December 2019 shows a total of 18,000 workers, which reflects a decline of 4,000 agricultural workers.

Puerto Rico's agricultural employers' needs are many because of the unpredictability of the weather, which makes it difficult to be fully prepared with enough workers available on the anticipated harvest dates. The most active period for agricultural employers in the coffee production sector is during the months of September and December. However, remarkable climate changes are altering these traditional dates and some growers need harvesters in January and February as well. In addition, agricultural employers share the concern of not having year-round workers, the lack of transportation alternatives, and housing scarcity.

Agriculture constitutes about \$808 million or about 0.8% of the island's gross domestic product (GDP). While most of the land is fertile, Puerto Rico imports 85% of the food it consumes. Only a mere 6% is arable; a fact that poses a direct threat to Puerto Rico's

food security. This situation is due to a shift in priorities focusing on industrialization of the most productive areas mainly for the production of seeds, deficiencies in the management of available land, lack of programs to support the development of alternative agricultural methods, and a rapidly declining agricultural workforce. Puerto Rico's geographical location within the Caribbean exacerbates these issues, making the existing crops vulnerable to the devastating effects of Atlantic hurricanes. The USDA Statistics estimate \$547,000,600 in Agricultural production for Puerto Rico. This represents a 32.23% margin of error as shown below:

<b>USDA:</b>	\$547,600,000
<b>Economy of Puerto Rico:</b>	\$808,000,000
<b>Difference:</b>	<b>\$260,400,000</b>
<b>Margin of Error:</b>	<b>32.23%</b>

Table 61. Margin of Error Economy of Puerto Rico and USDA

<b>Economy of Puerto Rico</b>	<b>Current \$</b>	<b>%</b>	<b>Estimated</b>	<b>% + Margin of Error</b>
<b>Agriculture</b>	\$808,000,000	0.8%	\$905,800,000	1.2%
<b>Industry</b>	\$50,601,000,000	50.1%		
<b>Services</b>	\$49,591,000,000	49.1%		
<b>Total:</b>	<b>\$101,000,000,000</b>			

The Southern part of the Island's agricultural activities were the most impacted by the earthquake of January 7, 2020 and its thousands of aftershocks. These rare events created a unique situation for the agricultural community, as many growers faced the possibility of losing their crops because, although the crops themselves may not have been directly affected, many of the workers lost their homes and were forced to relocate too far from their work area. Many others remain in shelters but have no transportation to report to work.

The already difficult situation of a severe lack of workers turned into a real crisis forcing many agricultural employers, including coffee, banana and tomato growers, to go to social media to implore people for help in order to save their crops. The PRDOA coordinated the use of government vehicles to transport volunteer workers from the local shelters resulting in hundreds of people reporting to work in an act of solidarity.



On January 15, 2020, the PRDOA initiated a campaign with several municipalities in the southern area to recruit, interview and transport individuals with no experience to work for several agricultural employers. As stated to local media outlets by the Secretary of the PRDOA, participants were assured that their wages would not be counted against their eligibility for social service benefits, would receive credits towards an agricultural bonus and would be fully covered by Workers Compensation and Unemployment while receiving \$7.24 an hour pay. 150 individuals reported to work saving some of the crops. Nevertheless, large amounts of this year's crops have been lost, causing millions of dollars in losses.

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 for work to be performed in the US 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.

In 2019 and 2020 an influx of new and young farmers has been noticed. These farmers are mainly focused on small scale specialty farming, hydroponic farming and organic agriculture. There is a need for educational opportunities and incentives for these beginner farmers, for farmers looking to shift to new crops or alternative farming methods, and for 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 current 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.

- (3) Provide an assessment of the unique needs of farmworkers by summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

Farm workers in Puerto Rico are predominantly local seasonal workers. Contrary to farm workers in the United States, Puerto Rico does not have workers that speak any language other than Spanish; not even the MSFWs through the H-2A program, who are also Spanish speaking. Puerto Rico does not have the diversity of workers from other countries, among the approximately 20,000 to 30,000 agricultural workers in Puerto Rico.

A small number of migrant workers are referred through the ARS to agricultural job opportunities in the United States. This number appears to be in decline due to the new opportunities offered by Public Law #87, jobs which tend to be longer lasting with higher pay. Therefore, MSFWs are now gravitating towards other types of employment in the US mainland. The low educational level and lack of understanding of the English language is one of the most evident barriers for MSFWs in Puerto Rico, because they are perceived as not ready to be inserted in the nonfarm labor market resulting in fewer services been offered to them.

The MOU between PRDOLHR and PathStone will facilitate the provision of educational services to MSFWs. PathStone provides education and information to agricultural workers on farms and camps and, in some locations, it provides English as a Second Language (ESL) instruction as well as small amounts of funding for books and supplies for educational purposes. Through the Outreach Program, the PRDOLHR will leverage resources with PathStone to increase the number of MSFWs enrolled in educational services.

Farm workers' extremely low wages keep them below the poverty level making them economically disadvantaged. Farm workers in Puerto Rico face additional barriers including social and physical isolation exacerbated by acute economic inequalities, educational gaps and lack of transportation. These barriers limit their ability to gain access to services available at the AJCs. The Outreach Program is an integral component of the AJC system designed to reach them at their place of employment or gathering in order to provide them with the available employment and placement services.

The low wage issue is supported by the lack of Agricultural Surveys to establish prevailing wage practices in the many crops grown in Puerto Rico. In the past, the PRDOA issued a Wage Subsidy reimbursing up to \$2.72 per hour worked to agricultural employers that met certain requirements to help them meet the Federal Minimum wage (Public Law #60, approved on July 1, 2019). However, that incentive is now subject to a production criterion making it harder to achieve, given the multiple obstacles the employers must deal with, such as lack of resources and labor force, to name a few.

The SMA will seek the cooperation of the WP Outreach Staff, the PRDOA, the Wage & Hour Division and PathStone to design an action plan, devise strategies to identify the areas of highest agricultural activity by region, select a significant sample of employers, and begin the collection of data for Agricultural Surveys of the predominant crops in Puerto Rico no later than September 2020.

- (4) Outreach Activities. The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:
- i. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

Puerto Rico has been designated as a significant MSFW supplier State for several States in the US mainland. As a result, Puerto Rico's AJCs are mandated to operate an Outreach Program to locate and contact MSFWs not reached by regular intake procedures. As of January 2020, the PRDOLHR has three (3) WP staff members assigned to Outreach duties. These Outreach workers operate out of the AJCs in Caguas, Mayagüez and San Germán, all identified as significant MSFWs offices. The remaining significant offices do not have staff assigned to cover the Outreach responsibilities.

PRDOLHR will explore available funding sources to place additional staff in the following offices: Ponce, Humacao and Coamo, where the agricultural community has been underserved. These areas have a high agricultural activity, particularly Coamo, which serves the largest tomatoes grower in the island, although not currently designated as a significant office.

The Outreach Program allows WP staff to make contacts with MSFWs all year-round and during peak agricultural activity periods. 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 job orders through the ARS, local H-2A job orders, and non-agricultural employment
- Referral to training opportunities
- Referral to supportive services
- Career counseling
- Job development
- Information on the WP complaint system
- Summaries of farm worker rights (terms and conditions of employment)
- Contact information for Labor Law enforcement agencies
- Referrals to PathStone
- Referrals to Legal Services

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.

In the event the MSFWs cannot or do not wish to visit a physical AJC, Outreach staff helps them complete an application for ES, provides referrals to employment opportunities for which the individuals are qualified, assists them in preparing complaints, or makes appointments for other services as needed. As appropriate, Outreach staff will carry out follow-up contacts with MSFWs.

Internal data collected by the PRDOLHR Foreign Labor Certification Officer shows the following as direct results of the above listed outreach efforts:

**Table 62. Outreach Efforts**

	<b>PY 2016-2017</b>	<b>PY 2017-2018</b>	<b>PY 2018-2019</b>
MSFWs Contacted	3,450	2,060	2,689
MSFWs Placed in jobs	54	37	48

- ii. Providing technical assistance to outreach workers. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the employment service complaint system, information on the other organizations serving MSFWs in the area, and a basic summary of

farmworker rights, including their rights with respect to the terms and conditions of employment.

The SMA is designing a schedule of trainings and joined meetings with 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 657.103. The first joint meeting is scheduled for April 7, 2020. With these trainings, the Outreach workers will be better equipped to:

- Develop strategies and techniques to locate and contact MSFWs in order 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 on 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 teaching 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.
- Solicit 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.

PRDOLHR is in the process of developing a cohesive AJC network system to ensure the provision of the above listed services to MSFWs and enhance the referral processes to both agricultural and non-agricultural jobs. Emphasis will be placed in coordinating efforts between the above-named partners to arrange an intensive training program for the entire local AJC/WP staff. These efforts will clarify terminology, strengthen the staff knowledge of labor laws related to the protection of this underserve population and

facilitate the provision of services, minimizing duplication. These on-going efforts will ensure that the current and new Outreach workers will be able to provide orientation on all services and explore solutions to issues in areas such as agricultural workplace safety to better assist the MSFWs and the agricultural employer.

The new SMA was hired as of February 6, 2020 and is diligently addressing the needs of the program by reviewing available data related to policies and procedures established to serve the MSFWs and the agricultural employers. Amongst the monitoring and advocacy activities that the SMA will be conducting are the following:

- Establishing collaborative network with partner agencies serving the agricultural community.
- Overseeing the operation and performance of the MSFW complaint system.
- Conducting On-Site Monitoring Reviews of all significant offices.
- Preparing the State AOP to be incorporated into the State Plan.
- Coordinating training sessions for the AJC staff, including Outreach workers.
- Participating in the coordination of pre-harvest meetings in various agricultural areas of the territory.
- Reviewing Outreach reports on an on-going bases for each significant office.
- Participating in public meetings concerning topics affecting the agricultural community throughout the state.
- Meeting with farm worker groups and employers to promote the use of the career center services.
- Providing technical assistance to all partners.

The SMA is charged with the responsibility to meet 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. In order to accomplish this task, the SMA will 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 will 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 worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

The PRDOLHR plans and implements employer services based on each career center service delivery plan. To ensure that agricultural employers' needs are met, AJCs provide key activities in the agricultural referral process, such as integrating services for agricultural employers and workers; identifying job-ready workers; and providing employers with labor market information related to their specific industry, among other services.

To comply with federal regulations, all AJC/WP staff will be trained in the ARS, the Complaint System and Agricultural Labor Laws. The training will provide essential information to staff engaged in serving the agricultural community, both employers and MSFWs.

The PRDOLHR signed a Memorandum of Understanding (MOU) with PathStone to jointly provide a comprehensive outreach approach to MSFWs. The Outreach Program provides the necessary framework for the AJC's staff to locate, contact, and enhance employability of MSFWs in Puerto Rico. Outreach workers from both agencies will make referrals to other WIOA partners, agencies and organizations in order to maximize the provision of services to MSFWs. All Outreach activities managed by ES will be funded with WP funds. Outreach workers will also contact agricultural employers during the harvest seasons to help in the coordination of recruitment plans for anticipated needs.

PRDOLHR's main focus is on services to business, while the State merit staff provides Outreach personnel to aid in scheduling visits throughout the agricultural community. The SMA will reach out to the PRDOA 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 on basic unemployment data system will be arranged for the selected staff.

- iv. Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

In accordance with 20 CFR 653.107(i-p), the PRDOLHR is providing outreach through three (3) career centers in agriculturally significant areas and will initiate the hiring process to increase the number of staff in an effort to reinforce the Outreach Program in all

significant offices. These centers are part of the State's WIOA AJCs, serving as either a comprehensive AJC or an affiliated site. The employment-related needs of MSFWs and the agricultural employers are of primary importance to the PRDOLHR and will be targeted in the following significant career centers:

**Table 63. Service area of career centers serving MSFW**

<b>Career Center Locations</b>	<b>Municipalities served</b>
<b>Arecibo</b>	Quebradillas, Camuy, Hatillo, Arecibo, Lares, Utuado
<b>Caguas</b>	Caguas, Cayey, Cidra, Aguas Buenas
<b>Humacao</b>	Humacao, San Lorenzo, Maunabo, Patillas, Las Piedras, Yabucoa, Juncos
<b>Guayama</b>	Guayama, Arroyo, Salinas,
<b>Coamo</b>	Coamo, Aibonito, Barranquitas, Villalba
<b>Ponce</b>	Ponce, Adjuntas, Jayuya, Juana Díaz
<b>San Germán</b>	Las Marías, Maricao, Guanica, Lajas, Peñuelas, Cabo Rojo, Yauco, Sabana Grande
<b>Mayaguez</b>	Añasco, Mayaguez, Hormigueros, Las Marías

Source: PRDOLHR.

The PRDOLHR staff allocation has not changed in several years, hence the active Outreach workers are in the same career centers as in past reports; Mayaguez, San Germán and Caguas. These three offices have knowledgeable, designated staff to assist growers and MSFWs through outreach activities.

The PRDOLHR is committed to have all significant career centers with the necessary staff to provide the employment-related needs of MSFWs according to 20 CFR 653.111. Once authorized to hire the additional staff, the PRDOLHR will be able to increase the number



of MSFWs served and provide outreach services to a much larger portion of the agricultural community.

**Table 64. Projected workers dedicated to outreach to farmworkers by service area**

<b>Service region</b>	<b>Career centers</b>	<b>Number of outreach workers</b>
<b>Northern</b>	Arecibo	1
<b>Southern</b>	Ponce, Coamo, Guayama	3
<b>Eastern</b>	Caguas, Humacao	2
<b>Western</b>	Mayagüez, San Germán	2

### **Northern Region**

This region has the second largest concentration of MSFWs. The mountainous area is known for its coffee production, specifically in Utuado and Lares. This region includes municipalities that when taken together the aggregate number of farm workers exceeds those of the Manatí service area. The AJC located in Barceloneta currently provides services to these agricultural areas.

### **Southern Region**

The Southern region is known to produce an array of vegetables and other minor fruits. Gargiulo and Pioneer continue to be the main agricultural employers in that area. Gargiulo is responsible for the employment of over 1,000 workers during the peak tomatoes season. The Coamo local office is responsible for the referrals of workers to Gargiulo, Pioneer and several other agricultural employers. Although not designated as a significant office, this office serves most of the MSFWs in the area. The SMA will evaluate this office to determine if it meets the requirements to be designated as a significant office and will request additional staff to serve this region accordingly.

### **Western Region**

This region has the highest concentration of MSFWs because it is where most of the coffee industry is concentrated, specifically in the municipalities of Yauco, Maricao, Las Marías and Sabana Grande. The Sabana Grande and Mayaguez staff assigned to the Outreach Program report a significant decline in the number of MSFWs due to changes created by the devastation caused by Hurricanes Irma and Maria. Additionally, many agricultural employers are no longer in business or are now operating at a much smaller scale due to the multiple natural disasters which devastated the region.

The Outreach workers confront extreme challenges in their efforts to reach the MSFWs due to the precarious conditions of the roads that lead to most farms in the area. Furthermore, the Outreach workers do not count with vehicles appropriate for the terrain and often have to leave their personal vehicles on the side of the road and complete the journey on foot which diminishes their effectivity as it doubles the time required to accomplish the task. It is yet to be determined if the resources for Outreach in the Western region are enough to carry out the program according to 20 CFR 653.107. The Mayaguez local office is a significant MSFW office.

### **Eastern Region**

The Eastern region does not account for a great number of MSFWs and the agricultural activity in this area continues to be minimal. However, all AJC staff will be trained in coordination with the USDOL Wage and Hour Division, EEOC and OSHA, in order to identify MSFWs in the area and provide them with labor market information, services and referrals as needed.

As previously stated, the SMA is designing a schedule of trainings and joined meetings with 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 657.103. The first joint meeting is scheduled for April 7, 2020. With these trainings, the Outreach workers will be better equipped to:

- Develop strategies and techniques to locate and contact MSFWs in order 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 on 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 teaching 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.
- Solicit 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.

PRDOLHR is in the process of developing a cohesive AJC network system to ensure the provision of the above listed services to MSFWs and enhance the referral processes to both agricultural and non-agricultural jobs. Emphasis will be placed in coordinating efforts between the above-named partners to arrange an intensive training program for the entire local AJC/WP staff. These efforts will clarify terminology, strengthen the staff knowledge of labor laws related to the protection of this underserve population and facilitate the provision of services, minimizing duplication. These on-going efforts will ensure that the current and new Outreach workers will be able to provide orientation on all services and explore solutions to issues in areas such as agricultural workplace safety to better assist the MSFWs and the agricultural employer.

- v. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The MOU signed between the PRDOLHR and PathStone in 2019 is expected to be amended in March 2020 to include additional requirements established under federal guidance. As the ETA's designated grantee for Puerto Rico, PathStone operates the NFJP and provides career and training services and related assistance for MSFWs. The cooperative agreement serves in establishing effective outreach coordination, enhance service delivery to MSFWs and increases registration activities between PathStone and the 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 effective customer service, by sharing the responsibilities for this population and maximizing the use of available resources.

PathStone also provides On the Job training to agricultural employers which includes: providing training tailored to the employer's needs, reimbursement of training expenses/salary up to 50% for a period not to exceed 8 weeks, monitoring the job performance of the trainees, certification on proper use of agrochemicals (WPS), training on heat exhaustion and other work related hazards, and training on proper use of agricultural equipment.

The SMA is already exchanging information with PathStone to determine employer's needs and will be scheduling an orientation for employers in the southwest region of the territory with the collaboration of a local agricultural employer.

Some of the most significant benefits of the cooperative agreement with PathStone are:

- The information exchange process is streamlined, improving the accuracy of shared information.
- Each organization will be better prepared to coordinate actions, particularly in matters that require expeditious action to safeguard the rights and wellbeing of the MSFWs.
- Staff's ability to properly and timely identify potential issues regarding the MSFW community increase.
- The establishment of a vehicle of communication with the AJCs and PathStone to periodically review and coordinate quality services to MSFWs and agricultural employers.
- Reports are shared on the staff hours spent performing MSFW outreach activity.

PathStone has a staff member placed in the Mayaguez ES local office after closing one of their offices in the area. This allows PathStone to leverage the PRDOLHR resources to better serve the MSFWs in the Western area. PathStone also has cooperative agreements with several AJCs and community partners focusing on integrated service strategies and resource sharing. Collaborative approaches reduce duplication of effort and ensures that resources are used effectively for the benefit of customers.

PathStone is also the NFJP housing grantee for Puerto Rico and provides housing support services to MSFWs through rental and utility assistance. The SMA and the PRDOL 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 farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's proposed strategies for-

(A) Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

The outreach staff in coordination with the Foreign Labor Certification Officer (FLCO) are developing a list of available resources to establish partnerships with local organizations serving MSFWs. Efforts would continue to coordinate initiatives between state agencies, federal agencies and private companies serving the agricultural community. By establishing collaboration with multiple agencies, the PRDOLHR will increase the

timeliness of response and achieve greater impact. Collaboration should be established with but not limited to:

- Department of Health
- Farmworker Health Program
- State Workers Compensation
- Wage & Hour Division (Caribbean District)
- PROSHA
- Puerto Rico Farm Bureau (AAPR)
- Migrant Legal Services
- PathStone Corporation
- PRDOE-Adult Education Program
- Migrant Health
- Productores de Café de Puerto Rico Inc.
- Puerto Rico Farm Credit
- PRDOA
- University of Puerto Rico Agricultural Extensions

AJCs will collaborate with Local Boards to ensure MSFWs have training opportunities for jobs in demand in the area. At the AJCs, all jobseekers receive a general orientation prior to receiving services for which they might apply. Through this orientation, workers become aware of the range of services available to them and how to apply for such services.

Once the workers receive the orientation, they have the option to use the self-service resource area where they can access the Internet to perform job searches, prepare resumes and browse job offers. If in need of job search assistance and placement services, the worker is referred to a WP Employment Specialist to be registered and assess his/her job readiness. Depending on the assessment, the jobseeker might be referred to an available job offer/job development, or to an Occupational Counselor for additional career services. If it is determined that the individual is not job ready, the jobseeker is referred to the appropriate partners to provide the necessary assistance to address their needs in order to pursue suitable employment. All MSFWs receive the same services as described above.

To increase the effectiveness of the Outreach program, the SMA will promote a more comprehensive approach to the provision of services by encouraging and facilitating nontraditional methods of Outreach activities such as:

- Quarterly meetings with agricultural employers that could be hosted by PRDOLHR, Puerto Rico Farm Bureau and other entities, partners, associations, and coops.

- Coordinated media advertising and promotion to make programs known.
  - Trade publications
  - Email newsletters
  - SMS Messaging
  - Social Media Advertising
- Utilize the tools and structures of already established organizations named through this document to offer services through them.
  - i. How career and training services required under WIOA Title I will be provided to MSFWs through the One-Stop Centers;

Once registered, a MSFW may receive the following career services:

- Preparation of job applications
- Assistance applying for Unemployment Benefits
- 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)

The ARS is operated and coordinated within the AJCs by WP and other partners. As a result, the FLCO shares Interstate Job Orders with AJC staff and PathStone and receives referrals from the different WIOA local areas. The FLCO receives job orders from the different State Order Holding Officers seeking qualified workers for agricultural jobs associated with an H-2A application. The job orders are distributed to local Workforce Centers and local AJCs to be made available to all job seekers, including registered MSFWs.

Outreach workers and WP staff at the AJCs are responsible for the identification of suitable workers to match them with the employer requirements. Once a potential candidate is identified, the staff will coordinate referrals with the Puerto Rico FLCO, assist the job seeker with scheduling interviews and help them make travel arrangements once hired.

The AJCs new software system that will replace the SIAC system (expected to be operational in April 2020) will assist Outreach workers in providing MSFWs with the full range of services available through the AJCs.

PRDOLHR's web site contains a broad array of employment resources for job seekers and businesses. In addition, PRDOLHR's provides an extensive bank of available jobs through its Job Bank website, puertorico.usnlx.com (to be later migrated into a new system). The

website is user friendly and can translate the site content into Spanish. Career centers' staff assists employers by referring qualified workers to their job orders. However, this process still poses challenges for career center staff serving MSFWs because the jobs available in the Puerto Rico Job Bank are mostly professional jobs which require college preparation, advance skills and experience. The PRDOLHR will ensure that local agricultural jobs, Public Law #87 jobs, and local entry-level jobs are also posted in the Puerto Rico Job Bank. Information on services, including how to register for services, is provided online ensuring that MSFWs have the full range of services available whether services are received in the field or a career center.

- ii. -How the State serves agricultural employers and how it intends to improve such services.

PRDOLHR plans to continue implementing strategies and exercise 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 farm-workers' specific needs. One possible resource is Puerto Rico's Agricultural Extension Program.
- Lack of facilities/staff to screen and interview potential farm workers. Career centers might provide temporary office space so 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. PRDOLHR, as part of the agreement established in the MOU, will coordinate efforts and grant activities with PathStone, Inc., the NFJP grantee for the Housing Grant under the WIOA 167.

Agricultural employers are critical to Puerto Rico's workforce, especially in the geographic areas where agriculture is the key economic industry. Services provided to farmworkers and employers should be focused on professionalizing the agriculture work, making it financially competitive against other industries such as construction and

manufacturing. The overall misconception about the agricultural worker a second class, non-ambitious individual makes it difficult to attract talent into the agricultural industry. Services provided to MSFWs and agricultural employers should include but no be limited to:

- Entrepreneurship and management courses for agricultural employers including HR related topics to develop a modern and optimized employer/worker relationship. These courses should be provided through coordinated efforts with entities such as Asociación de Agricultores de Puerto Rico, Productores de Café de Puerto Rico Inc., and other Coops due to their already strong relationship, bond and trust with the agricultural community.
- Increase participation of PathStone Corporation in the provision of services to agricultural employers by coordinated efforts among partners.
- Promoting the development of college level degrees focused on high-tech and innovative farming techniques, practices and methods. This will allow agricultural employers the opportunity to develop more profitable, sustainable and resilient businesses.
- Develop initiatives aimed at guaranteeing or facilitating a more stable employment opportunity for MSFWs such as but not limited to inconsistent employment, part-time only employment and low wages.
- Develop and actively promote initiatives aimed at enhancing the quality of life of MSFWs and their families, tackling issues such as housing, transportation and access to basic utilities.
- Enhance communication to strengthen the promotion of job opportunities available and the job seekers in the agricultural community.
- Investing in a series of Agricultural Surveys to establish prevailing practices and fair wages through the territory and generate reliable data that could assist all partners in the development of their service plans.
- Promote the development of standardized farming practices that allow organized farming to maintain a consistent supply of farm products.

The PRDOLHR Statistics Division collects data from employers based on their quarterly reports of unemployment benefits paid in accordance to the law. Below are the total number of Agricultural employers reporting employee wages to the Unemployment Division by municipality and grouped by region. This data supports the need to establish a more comprehensive Outreach program in order to meet the needs of these employers and their workers.



Table 65. Agricultural Employers by Region 2019

Agricultural Employers by Region 2019								
Noroeste		277	Norte Central -Arecibo		569	Sureste		119
	Aguadilla	18		Quebradillas	18		Juncos	12
	Moca	50		Camuy	45		Patillas	16
	Isabela	28		Hatillo	69		San Lorenzo	20
	San Sebastián	148		Arecibo	66		Las Piedras	19
	Añasco	21		Lares	121		Humacao	10
	Rincón	2		Utua	87		Yabucoa	31
	Aguada	10		Adjuntas	104		Maunabo	11
				Jayuya	59			
Suroeste		286	Norte Central-Manatí - Dorado		103	Sur Central		150
	Cabo Rojo	29		Barceloneta	5		Coamo	48
	Hormigueros	10		Florida	3		Juana Diaz	25
	San Germán	37		Ciales	35		Santa Isabel	31
	Lajas	49		Morovis	18		Salinas	17
	Sabana Grande	24		Manatí	19		Naranjito	29
	Maricao	39		Vega Baja	12			
	Yauco	52		Vega Alta	5			
	Guayanilla	22		Dorado	6			
	Peñuelas	11						
	Guánica	13						
La Montaña		247	Mayagüez-Las Marías		67	Ponce		50
	Corozal	60		Mayagüez	26			
	Orocovis	47		Las Marías	41			
	Barranquitas	95						
	Cidra	21						

	Villalba	24						
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Source: PRDOLHR -Studies and Statistics Division

The SMA will submit a comprehensive report to USDOL requesting the designation of new significant offices based on the above chart in order to establish an Outreach Program in those areas not previously targeted.

(B) Marketing the complaint system to farmworkers and other farmworker 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 SMA is responsible for the oversight, operation and performance of the complaint system. The SMA is also responsible for the marketing and promotion of the complaint system to other MSFW advocacy groups and partners. The SMA also ensures that Outreach workers inform MSFWs about their rights, how to use the complaint system, provide them assistance filing a complaint and following up as appropriate.

During the required career center orientation, job seekers are briefed on the WP 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 handled out to the worker at that moment. MSFWs are informed of their rights and the laws that protects them.

The SMA will review the protocols established for the successful implementation of the Complaint system and will conduct training for the AJC as needed.

(C) Marketing the Agricultural Recruitment System for U.S. workers (ARS) to agricultural employers and how it intends to improve such publicity.

Agricultural industry in Puerto Rico is undergoing a transformation prompted by a multitude of factors, including but not limited to an overall economic crisis of the territory, natural disasters that damaged most infrastructures, overall emotional unsettlement amongst the agricultural workers due to the loss of property, valuables, employment and even loved ones. As a result, there is a proliferation of foreign employers recruiting local workers, depleting the pool of MSFWs available to satisfy the needs of the agricultural employers. In response, for the first time in our history, local agricultural employers are

seeking workers through the ARS. As of February 2020, two large agricultural employers have placed H-2A job orders and are actively pursuing authorization to bring workers from Dominican Republic. Local agricultural employers are now willing to engage in the costly efforts related to this type of recruitment and the PRDOLHR has certified two housing units as part of the required guarantees they need to provide to MSFWs.

The SMA is closely monitoring the referral process of the existing H-2A job orders and is meeting with partner agencies to ensure that all MSFW rights are respected. The FLCO, Outreach workers and SMA will coordinate field visits to these employers within the active period of the job orders to ensure workers are aware of their rights and that all requirements are been met. The PRDOLHR will coordinate orientation and workshops for agricultural employers to ensure there is a clear understanding of the ARS and provide them with information needed to make an informal decision on whether to use the system.

(6) Other Requirements.

(A) Collaboration. Describe any collaborative agreements the State Workforce Agency (SMA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and establish new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

### **Cooperative agreement with Pathstone**

The PRDOLHR has a cooperative agreement with PathStone to provide a comprehensive outreach approach to MSFWs. The plan is to amend the recently executed agreement in the coming months and to enforce the responsibilities of each partner in the agreement. WP management at the AJCs will have the task to administer the agreement at the local level by ensuring that quarterly meetings are held to discuss what issues need attention within the agreement, so services reach the MSFWs community served by the significant career centers.

### **Legal Services of Puerto Rico**

The PRDOLHR has an agreement with the Legal Services Program to provide orientation and information to MSFWs who migrate to the United States to work in farm work through the Federal Agricultural Job Order Clearing System. The selected MSFWs are briefed on their rights in relation to the specific job order. If any MSFW needs legal assistance due to apparent violations of their rights by the agricultural employer who hired them, the PRDOLHR coordinates the assistance of Legal Services Staff to address their needs. The

SMA receives reports and participates in the coordination of assistance facilitating processes, keeping records and following up as needed.

(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, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

*i. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.*

After an exhaustive search of approximately two years, during the first week of February 2020, PRDOLHR finally recruited its SMA. The SMA developed a work schedule to review the delivery of services and protections afforded to MSFWs and to comply with the responsibilities imposed by 20 CFR 653.108. The SMA has arranged on-site reviews for all significant offices in order to ascertain findings, offer initial recommendations and coordinate technical assistance. In addition, the SMA made contact in person with PathStone, Wage & Hour Division and Legal Services to establish open lines of communication and promote the exchange of data and advantage of resources to better serve the MSFWs and the agricultural employers.

Due to the time constraint between the time of recruitment and the Unified State Plan submittal due date, in order to comply with the review and public comment requirement for the Agricultural Outreach Plan (AOP), on February 28, 2020 the organizations listed below were sent the draft of the proposed AOP and were be invited to comment until March 14, 2020 (during the same period provided to receive public comments for the Unified State Plan):

- PathStone Corporation
- Puerto Rico Legal Services - Farmworker Division

- Asociación de Agricultores de Puerto Rico
- PRDOA
- Migrant Health Center, Western Region Inc.
- Organización Boricua de Agricultura Ecológica

As of the date of final submission, no comments have been received.

As the program year progresses and the needs of the agribusiness community evolves, PRDOLHR 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.

(C) Data Assessment. Review the previous four years Wagner-Peyser Act data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

**Table 66. Percentage of MSFW and non-MSFW served, PY 2016-2019**

	2016 WP	2016 MSFWs	2017 WP	2017 MSFWs	2018WP	2018 MSFWs	2019 WP	2019 MSFWs
<b>1QTR</b>	43,234	1,325	35,162	840	38,323	981	32,292	1,533
<b>2QTR</b>	80,016	2,387	45,728	950	72,645	1,666	64,210	2,196
<b>3QTR</b>	125,719	3,338	77,824	1,803	198,990	2,057	N/A	N/A
<b>4QTR</b>	174,116	4,174	102,320	2510	280,382	2,992	N/A	N/A

Source: PRDOLHR.

(D) Assessment of progress. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

The number of MSFWs contacted during PY 2017-18 was over a thousand less than the prior year. This significant decline of agricultural workers was caused by multiple factors mainly associated with the impact of Hurricane Maria: The road conditions in most of Puerto Rico made it extremely difficult to access the areas where the MSFWs work and gather; many agricultural employers ceased operations or reduced their labor force for several months while working on the recovery of their farms; many MSFWs left the island

temporarily to live with family members in US mainland while waiting for the electricity and water services to be restored and many more relocated permanently.

During PY 2018-19, a total of 2,689 MSFWs were contacted, a little over 600 more than the prior year. Although by the end of 2018, most of the territory have recovered their basic utility services, the roads remain in extremely poor conditions and many farmers have been unable to return to full operations due to the slow processing of insurances and their lack of resources to replace what was lost. The three Outreach workers remained assigned to the same significant local offices and budget constraints prevented PRDOLHR from moving forward with the hiring of additional staff. However, it is our commitment to continue reinforcing the Outreach Program to comply with regulations as required by 20 CFR 653.107 and expand the Outreach service activities through eight (8) career centers to cover a larger area within the agricultural community. Authorization to cover those vacancies will be evaluated in a case-by-case basis.

If the economic crisis prevails and WP funds continue to be reduced as in previous years, the provision of services to MSFWs and agricultural employers could be adversely affected. Notwithstanding the above, efforts will be made to hire and designate Outreach workers for all significant offices to provide the whole range of service to MSFWs.

The PRDOLHR is committed to continue providing the same service level to MSFWs as to all other job seekers and monitoring the equity and minimum service performance indicators to measure the effectiveness of the MSFW Program by WP staff.

Furthermore, the present AOP will be subject to future modifications in order to allow for the SMA to complete the devised work schedule, properly review the program and submit a complete and updated plan with the benefit of receiving input from interested parties.

(E) State Monitor Advocate. The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The PRDOLHR SMA was directly involved in the development of the plan and approved the plan as drafted.

## WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

1. *The Wagner-Peyser Act Employment Service is co-located with AJCs or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));*

Yes. At the time of submission of this Plan, WP ES employees are co-located in all AJCs, with the sole exception of the Municipality of Fajardo, which is still negotiating the lease for the facilities. In the meantime, ES are provided in the Fajardo UI local office. Once the transfer of WP staff to the Fajardo AJC is completed, PRDOLHR will notify ETA.

2. *If the State has significant MSFW AJCs, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;*

Yes. There are only two MSFW vacancies, but efforts towards hiring the remaining two employees are well underway with the assistance and approval of the Puerto Rico Government. Once this milestone is achieved, PRDOLHR will notify ETA.

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 WP Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and*

Yes, within the AJCs.

4. *SWA officials:*

- i. Initiate the discontinuation of services;*
- ii. Make the determination that services need to be discontinued;*
- iii. Make the determination to reinstate services after the services have been discontinued;*
- iv. Approve corrective action plans;*
- v. 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 5 calendar days;*
- vi. 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*
- vii. Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.*

**Yes to all the above assurances.**





## VIII. ADULT EDUCATION AND FAMILY LITERACY PROGRAM

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

### (A) ALIGNING OF CONTENT STANDARDS

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

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

During the 2020-2024 period the DEPR will focus on the revision and re-aligning of the State education adopted standards and curriculum. The AEP will be part of this effort as it concerns to adult education. The implementation of the curriculum in all Adult Education program centers requires continuous faculty development efforts to assure teachers are thoroughly familiar with the academic content standards requirements. Hired academic facilitators will provide technical assistance in the implementation of the curriculum in all Adult Education program centers and activities. The AEP Program centers directors and key staff will provide technical assistance to program teachers in curriculum implementation. Adult Education program teachers will receive specialized training on the standards, the indicators, and assessment activities of the curriculum. They will provide emphasis on syllabus content, provided academic guidelines, technology, computer literacy, workforce preparation and employability skills to facilitate learning on adult participants.

The AEP will emphasize the importance in the life of people who have not completed high school, need for English language learning and civic participation and the rights and responsibilities of citizens. It is 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 understanding the American system of Government, individual freedom, and the responsibilities of citizenship. The commitment of the Adult Education Program is focused on providing a structured, innovative, flexible and contextualized curriculum, in addition to being dynamic and

adaptable to changes in the social system and the educational system in a contextualized environment.

The AEP will Implement a workforce preparation curriculum, including career pathways implementation, to 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 communication and technology use, as the leading skills. Also, it includes activities that promote critical thinking, and build self-management skills, such as utilizing resources and information, understanding systems, and working with others. This curriculum alignment is pending the State regular curriculum update, in progress.

In the implementation of the aligned curriculum standards the AEP will provide training to the teachers based on the following protocol:

The PEA has hired academic facilitators that are specialists in the subject that have been enriching and tempering the AEP educational plans. These staff resources will provide technical assistance to teachers in the program's curriculum, standards and indicators, and proposed changes to update teaching for adult or disabled participants. They will highlight the need to address and develop 21st century skills, digital literacy, and employability and workforce preparation skills to achieve a transition to postsecondary education level or to the workplace. Workplace skills, often called employability skills, are the basic skills a person must have to succeed in any workplace. They are the core knowledge skills and attitudes that allow workers to understand instructions, solve problems and get along with co-workers and customers. The academic facilitators will offer training workshops, coaching and mentoring by subject and individualized technical assistance in each of the centers.

The Service Providers of each center will receive technical assistance related to all the requirements of the AEP training activities to achieve a better academic performance and greater preparation so that the adult participants can compete in postsecondary levels and/or in the labor market, in the particular skills that each employer needs. They will also receive technical assistance for teachers in the areas of need required.

All teachers of the Adult Program will receive specialized professional training related to the standards and indicators of the Program, activities related to the development of 21st Century skills, important for competitiveness in the global labor market, STEM, employability and workforce preparation skills and career pathways.

## (B) LOCAL ACTIVITIES

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

### **Adult Education and Literacy Activities (Section 203 of WIOA:)**

Adult education;

Literacy;

Workplace adult education and literacy activities;

Family literacy activities;

English language acquisition activities;

Integrated English literacy and civics education;

Workforce preparation activities;

or Integrated education and training that—

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and

2. Is for the purpose of educational and career advancement.

### **Special Rule**

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

Activities under adult education; literacy; workplace adult education and literacy activities and family literacy activities

The AEP will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Plan will include the scope, content, and organization of these local activities: Adult education; Literacy; Workplace adult education and literacy activities; Family literacy activities; English language acquisition activities; Integrated English literacy and civics education; Workforce preparation activities; and Integrated education and training that provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and that are for the purpose of educational and career advancement.

After AEFLA grant is considered available, the AEP will conduct a full and open competition for new grants activities. The grant application will address, at a minimum, the thirteen considerations and requirements established in Title II. The competition will be open to all eligible providers. All eligible providers will be required to submit evidence of demonstrated effectiveness. To demonstrate effectiveness, applicants that have received Title II AEFLA funds in the program years immediately preceding the competition will be evaluated based on their performance against the state's negotiated targets during those years. Applicants that did not receive funds through the AEP will be required to provide data that show their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills.

**The eligible individuals and providers**

As administrative/fiscal agent, the program will ensure that service providers deliver services to eligible individuals who have attained at least 16 years of age; are not enrolled or 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. All activities funded under WIOA are authorized, approved and overseen by the Adult Education program.

The following organizations will be eligible to apply for funding provided they have demonstrated effectiveness and comply with the 13 considerations established by WIOA in providing adult education and literacy services:

- a local education agency;
- a community-based organization or faith-based organization;

- a volunteer literacy organization;
- an institution of higher education;
- a public or private nonprofit agency;
- a library;
- a public housing authority;
- a nonprofit institution that is not described in any of items A through G 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 in any of items A through H; and
- a partnership between an employer and an entity described in any of items A through I.

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 who have low levels of literacy in reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services provided in the state's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training. (34 CFR §463.24)

There are two ways in which an eligible provider may meet the requirements:

- An eligible provider that has been funded under Title II of the WIOA must provide NRS performance data required under Section 116 of the WIOA to demonstrate past effectiveness.
- 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 basic skills deficient eligible individuals in all of the following areas: reading, writing, mathematics and English language acquisition

The following outcomes will be used in determining demonstrated effectiveness of eligible education service providers:

- Number of eligible individuals served who are basic skills deficient in reading, writing, math and English language skills;
- Attainment of secondary diploma/equivalent; or
- Transition to postsecondary 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 on the basis of 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, services providers will be prohibited from using federal funds to supplant state or local dollars. All federal funding will be used to enhance learner's 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 regional media. In addition, all providers will be 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 will use the following parameters to distribute funds to approved applicants:

- 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, of which not more than 20 percent of such amount shall be available to carry out Section 225.
- Shall not use more than 12.5 percent of the grant to carry out State Leadership activities under Section 223.
- Shall not use more than 5 percent of the grant funds, or \$85,000, whichever is greater, for administrative expenses of the eligible agency.

Every effort will be 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's purposes outlined in WIOA:

- Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;
- Assist adults who are parents or family members become a full partner in the in the academic development of their children;
- Promote transition from adult education to post-secondary education and training through career pathways;
- Assist adults in completing high school and hold a diploma o equivalent certificate;

- Assist immigrants and English language learners improve reading, writing, math, and comprehending the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship; and
- 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, in order 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. We summarize here the 13 Considerations of WIOA for Funding to be enforced which are:

The degree to which the eligible provider would be responsive to:

1. Regional needs as identified in the local plan under WIOA, Section 108;
2. Serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals who:
  - i. have low levels of literacy skills; or
  - ii. are English language learners
3. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
4. Past effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in WIOA Section 116, especially with respect to eligible individuals who have low levels of literacy; and
5. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under WIOA, Section 108, as well as the activities and services of the one- stop partners.

Whether the eligible provider's program:

1. is of enough intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and
  2. uses instructional practices that include the essential components of reading instruction.
- Whether the eligible provider's activities, including reading, writing, speaking, mathematics, and English language acquisition instruction delivered are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice;
  - Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the

amount and quality of learning and how such technology, services, and systems lead to improved performance;

- Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
- Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means;
- Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, non-profit organizations, and intermediaries, for the development of career pathways;
- Whether the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;
- Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with Section 116) and to monitor program performance; and
- Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs (Integrated English Literacy and Civics Education).

### **Productivity principles in service delivery by approved applicant activities**

The PRDE's -AEP, will emphasize and encourage several principles in the service delivery to participants by the approved applicants. These principles include:

The delivery of adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster.



Delivery of programs that provide to participants the contextualization of English language acquisition with employability, workplace and financial literacy skills, as described in sec. 129(b)(2)(D) of WIOA, under the individual career services category.

Fostering the requirement of collaborative agreements and formal partnerships as part of the service provider grant application. If an eligible provider do 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 pathways plan components and the Thirteen Considerations of WIOA.

The delivery of services to adults who are English language learners fully implementing Integrated English Literacy and Civics Education (IEL/CE) as 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.

Eligible providers programs and activities should assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; assist adults who are parents or family members become a full partner in the education development of their children; promote transition from adult education to post-secondary education and training through career pathways; assist adults in completing high school and assist immigrants and English language learners improve reading, writing, math, speaking and comprehend the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship.

Activities under Integrated education and training that provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster and is for the purpose of educational and career advancement.

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.

### **Partnership with the Career and Technical Education area**

The AEP will foster partnerships with the Career and Technical Education (CTE) Assistant Secretariat (Vocational Education Program) at the DEPR and the six technology institutes administered by the CTE under the PRDE to implement integrated education and training programs 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 eligible approved providers participating in the program activities and services will be encouraged to provide integrated education and training. The partnership with the CTE will be for the provision of services to individual in the Correction system. The partnership with the six technology institutes will be for the attainment of credentials to regular the AEP regular clientele.

### **Partnership with public and not for profit private institutions to foster new initiatives in integrated education and training**

The program will foster a partnership with other core partners, including the Assistant Secretariat for Training at the Puerto Rico Department of Labor and Human Resources and other not for profit private institutions with the purpose of fostering projects and activities to provide integrated education and training among qualified AEP participants.

### **Promote earning credentials**

The AEP will promote earning credentials to increase the number of students who earn their high school diploma and English learning or equivalent simultaneously with entry level industry recognized certification/credentials. The industrial, service sectors and conglomerates to be targeted will include manufacturing, health professions, technology and the hospitality industry. Also, the AEP will promote partnerships with accredited post-secondary and higher education institutions to design and implement programs aimed to credentials for the adult education clientele, providing concurrent basic education and occupational training. The AEP will enter partnerships with accredited post-secondary and higher education institutions to design and implement programs aimed to credentials for the adult education clientele.

### **A pilot Project with (I-BEST) strategy for credentials**

The AEP will initiate a pilot project with the (I-BEST) strategy, a model that boosts students' literacy and work and college readiness skills, so students earn credentials, get living wage jobs, and put their talents to work. This model challenges the traditional notion that students must complete basic education before starting to earn credits in a job-training or academic program. I-BEST pairs two instructors in the classroom — one to teach professional and technical or credit—bearing academic content and the other to teach basic skills in areas of reading, math, writing or English language. I-BEST programs develop

skills in the contexts of specific jobs and college programs, enabling students to move through college, earn credentials and get jobs faster.

### (C) CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

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

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

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

The 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.

Additional areas targeted through this program are:

- 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;

- 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 carry out a program for criminal offenders within a correctional institution, must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program. Section 225 (a) of WIOA states that from funds made available under Section 221 (a)(1) for a fiscal year, each eligible agency shall carry out corrections education or education for other institutionalized individuals. The funds shall be used for the cost of education programs for criminal offenders in correctional institutions, other institutionalized individuals and for other individuals, including programs for:

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

Programs will be design and shared with the correctional institutions personnel and service providers to support the access of incarcerated and formerly incarcerated individuals to life-expanding career pathways opportunities that include approaches such as dual enrollment, peer tutoring, and transition to re-entry services designed to facilitate post-release success and reduce recidivism. Additional areas targeted through this program will be: increased basic skills to obtain a high school diploma; readiness to transition successfully into the community and workforce; adult 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 the professional development of adult education teachers through innovative strategies.

#### (D) INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

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

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.

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 carry out the activities of the program.

The State will fund, in accordance with the requirements of title II WIOA, an Integrated English Literacy and Civics Education program and the Integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers. The AEP will prepare a Request for Proposals (RFP) requesting eligible service providers to present proposals for providing educational services under section 243 of WIOA for Integrated English Literacy and Civics Education. The issue of the RFP will be promoted and disseminated in local media, American Career Centers (One-Stop Centers) and DEPR Adult Education Centers among other dissemination methods.

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 and to place such adults in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. Section 243(a) establishes that the Secretary shall award grants to States, for English literacy and civics education, in combination with integrated education and training activities. The AEP at the DEPR, as mandated by WIOA, Title II, will be integrating English Literacy with Civics Education (IEL/Civics), basic education, workforce preparation skills and credentials into an integrated approach to benefit English learners. Such services will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, with emphasis to those participants engaged in the process of

acquiring the American citizenship. IEL/Civics might include workforce training. The teaching will integrate a comprehensive civic participation component into English Literacy. IEL/Civics project will be focused on contextualized learning in which language and literacy are developed through practical, immediately relevant, thematic units around civics education that is integrated into the skill areas of English reading, writing and speaking.

The IEL/Civics project will include the following activities as required by WIOA section 243:

- Provide instruction in literacy and English language learning; civic participation and the rights and responsibilities of citizens; and training for the workforce. The activities must be provided in combination with integrated education and training activities.
- Prepare adults who are English Language Learners (ELLs) for non-subsidized employment in occupations or career pathways, which lead to economic self-sufficiency
- Assisting English language learners to achieve proficiency in reading, writing, speaking and comprehension.
- Direct the adult to a high school diploma or its equivalent (Equivalency Exam).
- Direct English language learners to enter postsecondary education or training.
- Offer education for adults in combination with integrated education and training (IET).

The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate the services with the local workforce development system, particularly the American Job Centers (AJC) - (One Stop Centers), to carry out the activities of the program. The AEP will establish a cross referrals strategy to recruit participants for the program.

The Department of Education will take all necessary steps to implement an RFP process to ensure priorities for the use of IEL/Civics funds aligned with the scope and federal requirements governing IEL/Civics programming.

#### (E) STATE LEADERSHIP

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

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

Section 223 of WIOA mandates funds be used for four required activities and several permissible activities and encourage collaboration to avoid duplication and maximize

impact. The DEPR- AEP will perform the four required activities under section 223, including:

1. Alignment of adult education and literacy activities with other core programs and one-stop partners to implement strategies identified in the unified State plan, including development of career pathways to provide access to employment and training services for adult education participants.
2. Operate high quality professional development programs to improve adult education instruction including incorporating essential components of reading instruction, instruction related to specific needs of adult learners, instruction provided by volunteers or other personnel and dissemination of information about models and promising practices.
3. Provision of technical assistance to local providers receiving funds including the development and dissemination of instructional and programmatic practices based on 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 in use of technology including staff training and improving efficiencies.
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

The DEPR- AEP will perform several of the permissible activities under section 223, including: technology instruction investments, curriculum development, achieving performance objectives and transition to postsecondary education. The 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 activities under section 223 of WIOA:

The Alignment of adult education and literacy activities with other core programs and one-stop partners to implement strategies identified in the unified State plan, including development of career pathways to provide access to employment and training services for adult education participants

### **Collaboration with other core programs and partner's agencies**

The PRDE's AEP will work collaboratively with other core programs and partner's 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 have 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 the infrastructure costs for the operations of the AJC. The AEP maintain a regular employee staff member on each one of the 16 One-Stop Centers one day a week to evaluate adult education potential participants y 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.

### **Development of career pathways**

The DEPR-AEP will update and expand the implementation of the Career Pathways system with the following goals:

1. Making use of the Career Pathways Plan as a strategic planning tool - that align and bridge training, education, employment and supportive services at the local and state levels; partnering with employers; and enabling individuals to move beyond adult basic education and succeed in postsecondary education, earn industry recognized credentials, and advance along a career path;
2. 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; and 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 the attainment of credentials that are relevant to employers.

The AEP is aware of the existing gap between the 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 to 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 provide a credential with labor market value.

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. The model will have the following main components:

- Basic and occupational skills instruction delivered concurrently to support accelerated entry into college-level occupational training programs and credentials for those participants with skill levels too low to meet entry requirements;
- Instructors overlap, integrated basic skills and occupational training instruction, allowing participants to build knowledge about the industry while increasing their basic skills;
- Participants will be exposed to work environments through a diversity of instructional tools including labs, internships and shadow jobs (job exploration tours); and
- Academic and non-academic supportive services to help participants persist in their programs: guidance and assistance to apply for available financial resources; access to standard college support services such as tutoring; employment linkages to local industry and access to college career centers.

### **Update the Implementation effort of the College and Career Readiness Standards (CCR Standards)**

The DE-AEP will also focus on the update of the system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education. In addition to the update of career pathways and partnerships, the DEPR-AEP will focus on update of the College and Career Readiness Standards (CCR Standards) to link basic education for adults, postsecondary education, and the world of work. At present time the DEPR-AEP has the curriculum aligned to the 2007 Standards. The standards require the implementation of the critical skills and knowledge expected by employers and required for success in workforce training, postsecondary 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 the transition to work. The effort will

promote, also, English language acquisition and civics education. The College and Career ready standards are designed to be relevant to the real world, allow students to master more critical-thinking and unique problem-solving skills, and to reflect the knowledge, skills and social foundations that our students need for success in both college and work.

Operate high quality professional development programs to improve adult education instruction including incorporating essential components of reading instruction, instruction related to specific needs of adult learners, instruction provided by volunteers or other personnel and dissemination of information about models and promising practices.

The DEPR-AEP is committed to develop high quality professional development activities, and support services which will help teachers/instructors better understand the career pathways systems and expand their professional knowledge.

### **Professional development for career pathways update**

Areas and themes related to the development and delivery of career pathways systems that would help low-skilled adults' transition into postsecondary education and employment or with disabilities, include the following:

- Design of Contextualized Instruction, including the STEM approach;
- Integration of employability skills into the classroom;
- Integration of career pathways into the adult education program curriculum-framework;
- Integration of career counseling and planning into adult education; and
- Focusing participants on career pathways.

### **Provision of technical assistance to eligible providers of adult education and literacy activities**

The plan for providing technical assistance to service providers will include:

- Technical assistance in the curriculum thematic areas;
- Academic supervision to offer mentoring and coaching in both contents and Andragogy process;
- Training and technical assistance in the integration of digital literacy skills into all adult education and literacy activities; and
- Training on the administration of pre and posttests standardized by the National Reporting System (NRS) and the descriptors of each level of functioning, used to measure educational gain and training on the monitoring of achievements of the core measures for the NRS.

## **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 for teachers. In an online class, teachers can work at their own pace, as well as access classes any time of the day from any working technical location. Online professional development provides an open schedule, great flexibility and can substantially decrease stress for teachers and their students.

For teacher, physical classroom attendance requirements can cause scheduling conflicts and challenges. Requiring teachers to come to a physical location or stay at school late at night can cause significant challenges. When teachers are required to attend a physical location for professional development, the cost can be significant for both teachers and the AEP. Online courses are typically more affordable than in-person classes. Technology reduces the cost of delivering professional development in various ways. Teachers can save money on gasoline, clothes and books. The Department of Education can save money on renting space, printed materials and furniture. Therefore, it is an excellent choice for both parties to consider online professional development courses.

Provision of technical assistance to local providers receiving funds including the development and dissemination of instructional and programmatic practices based on 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 in use of technology including staff training and improving efficiencies.

The DEPR-AEP will foster the development and implementation of technology applications, translation technology, distance education, including 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 in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance".

The DEPR-AEP will also, promote the implementation by service providers of the essential components of reading instruction in the basic and secondary education activities,

including phonemic awareness; phonics; vocabulary development; reading fluency, including oral reading skills; and reading comprehension strategies. Reading comprehension involves three levels of understanding: literal meaning, inferential meaning, and evaluative meaning. To achieve this objective the service providers will be required to implement several reading strategies, including activating background knowledge. Better comprehension occurs when students are engaged in activities that bridge their old knowledge with a new questioning and analyzing text structure.

In consideration to this commitment the DEPR-AEP will develop and implement the following activities:

### **Incorporation of Internet service technology into adult education classrooms**

The DEPR-AEP will make 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. Internet in education classrooms 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 the internet technology without the wires. School Internet is about facilitating better education through reliable, secure and supported wireless connectivity, which provides students and staff with the ability to work and connect in all areas of the school campus, all the time. The Internet technology facilitates, also, the learning through distance education.

### **Preparing and setting interactive classrooms in the instruction centers**

The AEP will invest funds in developing interactive classrooms with Smart boards, internet access, learning platforms, online resources and learning materials libraries with the purpose on enhancing learning. The 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 any notes made during the lesson, reducing duplication of effort and facilitating review. It can be used to carry out videoconferences, attractive presentations, staff training, distance meetings, information sessions and group discussions. Therefore, it is also an excellent information technology and telecommunications (ICT) resource for the teacher 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 an reflective, contextualized and strategic way, which gives students the possibility of access to a critical and constructive

education, in which each one is the manager of their own change and pedagogical progress.

### **Provision of portable notebooks in classrooms**

The AEP will equip with portable computers notebooks the adult education classrooms. Schools across the country have experimented with providing students with a notebook to facilitate learning. Providing students with notebooks for use in the classroom and at home, improve learning in several subjects, including science, math, and English. Students receive more feedback on their writing, edit and revise their work more often, draw on a wider range of resources to write, and publish or share their work with others.

The benefits of using computer notebooks in the adult education classroom include:

- 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 an online school calendar
- Allowing students to receive and view assignments online and submit their work via e-mail rather than being required to print them
- Improving the review process: Teachers may edit student papers and return them digitally to provide more detailed feedback
- Improving students' computer literacy skills
- Making learning more interesting for technology-savvy students

### **Incorporating online public domain and subscription-based search platform in the interactive classrooms**

Adult education teachers and students will benefit from online search resources on public domain. To help teachers make better use of their time and resources the AEP will research and acquire online public domain search platform for the interactive classrooms with educational content, most of which is created and shared by fellow teachers and educators. These resources will provide ready-made lesson plans and study guides, practice exercises and other tools, to enhance teaching/learning for the student and professional grow for the teacher. Also, the interactive boards acquired will include a full search and education material data base to help teachers and students in their learning process.

### **Development of a distance education program**

The AEP will implement a distance education program to provide the necessary space to let teachers boost the learning and skills gains on adult learners. The distance education strategy will include two modalities:

1. blended (hybrid) distance education; or
2. Full distance education in a long-range stage.

The distance education plan will let teachers develop supplemental activities and materials, fill gaps and address skills as they become more familiar with the curriculum over time. The AEP will promote the use of technology platforms for distance education. In an initial stage, a face to face approach combined with working remote on assignments, in a blended model approach, instructors will include both in-class and online instruction. In the long run, the AEP will promote a full distance education approach using technology platforms.

The provision of assistance to eligible providers in developing and implementing programs that achieve the objectives and in measuring the progress of those programs in achieving such objectives, including meeting the State adjusted levels of performance described in section 116(b)(3), to comply with the requirements of NRS.

The DEPR-AEP will provide technical assistance to approved service providers on how to comply with measuring the progress of those programs in achieving such objectives, including meeting the State adjusted levels of performance described in section 116(b)(3), regarding the reporting requirements for NRS. This reporting includes the total number of participants served, and the total number of participants who exited each of the core programs identified in sec. 116(b)(3) including disaggregated counts of those who participated in and exited a core program, by: 1) Individuals with barriers to employment, 2) co-enrollment in any of the programs in WIOA sec. 116(b)(3), 3) information on the performance levels achieved for the primary indicators of performance for all of the core programs identified including disaggregated levels for (i) Individuals with barriers to employment.

### **Technical assistance mentoring program for service providers**

Design, develop and implement of a technical assistance mentoring program among service providers to pair expert providers with providers that are emerging in their development of career pathways and integrated education and training. Under these partnerships the service providers with less resources and experience will receive the benefits of the more in-depth knowledge of their partners. The service providers with more experience and effectiveness will help the AEP as mentors in technical assistance for the less experienced providers. This effort on collaborative networks will boost synergy on the servicing system for the AEP clientele.

Monitoring and evaluation of the quality and improvement in adult education and dissemination of information about models and promising practices within the State.

The AEP will perform ongoing data collection to support the design, implementation, and evaluation of program activities, including: analysis of labor market data, which will help our program identify local workforce needs and improve the program offering and career pathways for the participants. The AEP will promote activities to improve adult education including leveraging existing funding sources, expanding staff skills and capacity, using and sharing administrative data, and leveraging and integrating of data.

WIOA legislation emphasize the importance of program monitoring. Monitoring ensure that proper systems are followed and meet legal requirements. Monitoring includes onsite and desktop monitoring systems, corrective-action procedures, follow-up procedures, and other items. The reason for emphasizing monitoring is to help reduce possible audit exceptions, sanctions, and unallowable costs that result in penalties and fund to be reimbursed to the Federal government.

We aim to Improve the structure and delivery in the system to assist the unemployed adults in achieving a family-sustaining wage while providing our employers with the skilled workers they need to compete on the marketplace.

The AEP will lead efforts to identify and promote proven and promising strategies, practices and initiatives for meeting the needs of employers, workers and job seekers, and identify and disseminate information on proven and promising practices carried out in other local areas for meeting such needs.

The AEP will foster and implement promising strategies for meeting the employment and skill needs of workers and employers, such as the establishment of industry and sector partnerships, that provide the skilled workforce needed by employers and that expand employment and career advancement opportunities for workforce development system participants in in-demand industry sectors or occupations.

## (F) ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

### **Quality assessment**

The DEPR-AEP will enforce the criteria number 3 of the 13 considerations of WIOA, regarding the effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in WIOA Section 116, especially with respect to eligible individuals who have low levels of literacy.

Also, all applications submitted for funding must comply with section 231 and the stipulations of this Plan regarding submission of applications. In addition to those included in the application, the applicants must also comply with the following requirements:

- Submit clear and measurable goals and objectives that promote higher student achievement and performance. Their performance levels must meet those established at the state level.
- Demonstrate through measurable outcomes and performance measures, their past effectiveness in helping participants attain higher literacy skills, especially at the lowest levels of literacy.
- Student performance, retention and promotion must be reported to the State, as might be required, through its new student information system.
- Must evidence that they are serving the most in need (low income and low literacy students) through needs assessments and community analysis.
- Programs must be of enough intensity and duration; therefore, must meet the requirements established by the State for programs that assist participants in attaining a high school diploma, or assist in the transition to postsecondary education and training using career pathways. Enough intensity and duration must be evidenced by an operational design that is appropriate to meet the established performance measures. The integration of prioritized literacy-based workforce preparation skills and digital literacy skills in the instruction delivered under content domains, will be strongly encouraged for all programs.
- 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.
- Service providers must hold programs in a non-threatening environment where real life and life-long learning skills are promoted. These strategies are critical for participants to prepare productive and contributing members of the community for the global economy.
- Professional development for all adult education program personnel must meet high quality standards established by the PRDE in terms of credit hours and intensity of training. The PRDE supports adult educators in learning and applying practice that are based on the most rigorous or scientifically valid research available.
- Local service providers must demonstrate how they will implement 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.



- Local service providers must commit themselves to provide to the PRDE all required data and comply with the Student Information System. This element is essential in tracking students and assessing their performance. Local providers will be trained for data collection and submission procedures and will be required to submit all required data within the deadlines established by the Adult Education program.
- Local service providers of English Literacy and Conversational English must substantiate the need for these programs in the community, describe how their program will effectively address participant's needs and document program outcomes.
- The Adult Education program will encourage service providers to offer programs in a flexible schedule and with ample support services to enable adults to attend and complete these programs. Workplace literacy providers will be required to offer flexible schedules and locations that will accommodate the needs of working adults. The Adult Education program promotes support services such as childcare and transportation, among local service providers.

The local providers will be accountable for meeting and complying with standards of quality for administration and instruction of Adult Basic Education activities. The effectiveness of 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 education activities of the service provider.

### **Performance accountability**

The performance accountability assesses the effectiveness of grantees in achieving continuous improvement of adult education and literacy activities. The performance outcome measures consist of the following core indicators:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit of the program
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit of the program
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program
- 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 skills gains toward such a credential or employment

- The indicators of effectiveness in serving employers established pursuant to WIOA
- Measurement of effectiveness of service providers in previous service delivery.

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.

Each fiscal year, the Adult Education program negotiates 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 the negotiated performance targets.

#### 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 Department of Education, agency that is eligible to submit the plan
2. The Department of Education has authority under State law to perform the functions of the State under the program
3. The State legally may carry out each provision of the plan
4. All provisions of the plan are consistent with State law
5. The Secretary of Education has authority under State law to receive, hold, and disburse Federal funds made available under the plan
6. The Secretary of Education specified by the title in the certification, has authority to submit the plan
7. The Department of Education 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:**

The Department of Education will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions);

The Department of Education will seek that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA.

The Department of Education 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;

The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities

The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and

Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the Department of Education will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

## IX. VOCATIONAL REHABILITATION

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

### (A) INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

- (1) input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The Puerto Rico State Rehabilitation Council presents the following recommendations to the VRA, related to the VRA Portion Goals and Strategies in the 2020 Unified State Plan.

#### **Goal 1:**

- Establish alliances with existing public and private entities that provide training, advice and resources for self-employment. For example: Guayacán, Colmena 66, Centro para Puerto Rico, among others.
- Establish alliances with job placement entities to identify available positions and consumers who could be potential candidates.
- As agreed, it is recommended that a written protocol will be established to share communications for the provision of services, so that CER makes the corresponding recommendations.
- Establish a frequently updated electronic database through the Internet to match available job positions and qualified consumers.
- Amend the current regulatory communication related to the services of independent living centers, or publish a new one, to clarify how these can benefit the active consumers of the VRA. In this way, increase referrals of consumers with significant disabilities to independent living centers to strengthen their skills and achieve greater job placement, employability and possible support in job retention

#### **Goal 2:**

- Strengthen the effective implementation of the protocols existing between the DE and the VRA, including the coordination of the PEI review at any time of the year, to avoid accumulation during certain months of the year; in this way, the participation of VRA personnel can be increased.
- Guarantee the acquisition of pre-employment knowledge and skills of youth in transition, which are measured through the evaluation sheets at the end of each workshop or activity.
- Continue to identify the island-wide number of students who can benefit from this service compared to people who have not been impacted.

**Goal 3:**

- Establish alliances with the regional employers' committees to identify the available positions and the consumers who could be potential candidates.
- Incentivize employers through public recognition for inclusive practices.
- Develop an online guide for employers that provides information on the benefits of VRA services and having an inclusive work environment, as well as applicable legislation.

**Goal 4:**

- Use the VRA website and social networks to educate parents, school personnel and other interested parties about VRA services.
- Proactively use the mass media for the dissemination of VRA services, for example FM radio stations and television programs at times with the largest audience.
- Establish a procedure for coordinating the participation of the CER in all outreach activities sponsored by the VRA. The purpose of such participation is so that the general public knows the role of the Council, the sectors represented and who can participate in the public meetings that the Council leads. Furthermore, the participation of the Council in the activities would allow members to observe how the activities are carried out to make recommendations, as established by federal law.

**Goal 5:**

- Digitalization of documents containing administrative, fiscal and programmatic procedures in an accessible format so that they can be easily accessed through the web by VRA personnel and the general public.

(2) The Designated State unit's response to the Council's input and recommendations;  
and

The VRA accepts PRSRC's recommendations on VRA's portion of the State Unified Plan and places forth the following reactions:

**Goal 1:**

During the 2017 and 2018 programs, the staff of the Support Centers and Employment Modalities (CSEM) developed / participated in 80 activities in coordination with the Department of Labor and Human Resources (DTRH), which facilitated knowing the new employment trends and the types of employer. On the other hand, they continued to receive various publications and / or journals from the DTRH Research and Statistics Division, some of these were: Business Employment Dynamics, Industrial Composition by Municipality (published quarterly); Covered Jobs and Wages. These publications and / or magazines allow CSEM staff to continue developing workshops for consumers.

The Office of Support and Employment Modes (OSEM) received approximately 60 job offers from various types of employers by email. Once received, he referred them to the CSEM to be analyzed and identify potential consumers who could benefit from employment alternatives.

The Office of Rehabilitation Counseling Services (OSCRV) referred 182 job offers to OSEM.

- However, the recommendation on stablishing alliances with public and private entities as a Center for Puerto Rico, Guayacán y Colmena 66, will be analyzed to determine the extent of these around the population we serve.
- Similarly, The Office of Support and Employment Modes (OSEM) are developing new strategies to establish alliances with job placement entities to identify available positions.
- In relation to developing a protocol to share those communications for the provision of services that require.
- SRCPR input, it will be developed in common agreement.
- In terms of establishing a database to provide the available jobs for qualified consumers, to VRA is the process of acquiring a new case management system and recommending establishing an area for those purposes.
- The Normative Communication Number 2011-19 Management of referrals and request for services for the Independent Living Program, is in the process of revision to issue new communication regarding the services of independent living centers, according to WIOA.

**Goal 2:**

The recommendations made by SCRPR on the strategies of goal 2 are accepted, however they are contemplated in the interagency agreements that the VRA has established with the Department of Education. See sections VI.VR(d)(1) and VI.VR(d)(2).

**Goal 3:**

Regarding the recommendations related to strengthening the relationship with employers to identify integrated competitive employment opportunities and career exploration, the Office of Support and Employment Modes and the Support Centers and Employment Modes are immersed in the development of strategies, active participation with employers and employers committees and development of salary incentive contracts to increase employment opportunities for consumers.

**Goal 4:**

Regarding the recommendations made on maintaining the process of disclosure of the agencies services, emphasizing the criteria for eligibility and service provision, the VRAPR has developed strategies to maintain and improve the process of dissemination of services, emphasizing the criteria of severity and the provision of rehabilitation services to people with disabilities, such as guidelines the services that VRA offers to public and private agencies.

- Participation in service fairs in consortiums, boards and municipalities among others.
- The VRA participated in orientations in the different radio and television stations to promote the services of the agency.
- In terms of establishing a procedure for the participation of SRCPR in the activities of the VRA, the same will be developed in common agreement to determine the scope of this.

**Goal 5:**

The agency has document digitalization process for fiscal and programmatic administrative process, some of these may not be accessible to all staff or the general public due to its confidential nature and the guarantee the security of the systems, the VRA has a digitalization are known as ARVI where employees can access manual communications and guides among others.

- (3) The designated State unit's explanations for rejecting any of the Council's input or recommendations.

Explanations are integrated in the previous section of the Designated State unit's response to the SRC's input and recommendations.

#### (B) REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the state wideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

- (1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Not applicable.

- (2) the designated State unit will approve each proposed service before it is put into effect; and

Not applicable.

- (3) All State plan requirements will apply requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable.

#### (C) COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

- (1) Federal, State, and local agencies and programs;

The PRVRA 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 PRVRA 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 PRVRA 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 ARV 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 ARV.

### **State Insurance Fund Corporation**

The PRVRA 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 PRVRA receives an annual allocation of funds of \$600,000, which is used to match federal funds.

### **Institute of Developmental Disabilities**

The PRVRA 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 PRVRA 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 PRVRA 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 PRVRA, 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 PRVRA 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 PRVRA offers orientation to the staff of the DSPID and provides services to referred individuals who are eligible.

### **State Council on Developmental Disabilities**

PRVRA supports and participate in activities related to services for people with developmental disabilities. Also attends to assigned work committees.

### **Private IHE and Non-Profits**

Carlos Albizu University. The PRVRA maintains a collaborative agreement with this university for the practicum of psychology students in our facilities.

Bayamón Central University (UCB, by it's acronym in Spanish), and Catholic University of Puerto Rico. The PRVRA maintains collaborative agreements with these universities for the placement in our facilities of practicum and internship students of Master's Degree in Rehabilitation Counseling, Bachelor's Degree in Rehabilitation, and Vocational Evaluation Certification (UCB).

Interamerican University, Ponce Campus. The PRVRA maintains collaborative agreements with this university for the practicum of occupational therapy students in our facilities.

### (2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

The PRVRA has representation in the Advisory Council of the PRATP 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 Assistive Technology Advisory Council of Puerto Rico (PRATP, by its acronym in Spanish) is composed by members representing government agencies and people with disabilities representing the public interest. PRVRA's participation in that Council is mandatory. The main function of the Council is to respond and represent people with disabilities for the establishment, implementation and evaluation of the Program, in order to facilitate information, availability and access to assistive technology (AT). The Director of the PRVRA's Avaluation 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

(3) Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

At the moment, the PRVRA is not using services, facilities or a program carried out by the Under Secretary for Rural Development of the US Department of Agriculture; nor is utilizing services and facilities of agencies and programs with respect to state use contracting programs.

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

The Workforce Innovation and Opportunity Act (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 (ARV) developed public policy to establish the referral process for the Job Corps Program.

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 ARV.

- PRVRA 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 PRVRA.
- PRVRA 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.
- PRVRA and JC will provide services island wide, according to their resources.

(5) State use contracting programs.

Not applicable.

#### (D) COORDINATION WITH EDUCATION OFFICIALS

(A) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

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 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 (PIPE), 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 PRVRA
  - 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, self-management, 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 PRVRA 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 PRVRA 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, as stated in WIOA.

1. Information on the formal interagency agreement with the State educational agency with respect to:

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.

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 students with eligible or potentially eligible disabilities. Pre-employment services for students in the transition process are as follows:
  - a. Career Exploration Counseling;
  - b. Learning experiences based on employment;
  - c. Counseling on opportunities to enter transition programs or post-secondary education;
  - d. Training to develop social and independent living skills necessary to be ready for employment; and
  - e. Instruction on self-intercessory.
2. 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:
  - a. Medical and other aspects related to impediments.
  - b. Requirements to request services and eligibility criteria of the Vocational Rehabilitation Administration.
  - c. How school personnel can assist the student in preparing to receive the services of the Vocational Rehabilitation Administration.
  - d. Identification of transition needs, such as assistive technology, orientation training and mobility; in other aspects.
  - e. The scope of pre-employment transition services and the requirements to benefit from them under WIOA.

- f. The analysts of the Vocational Rehabilitation Administration will guide on 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 reference to the Vocational Rehabilitation Administration must include the following:
  - a. Student's Social Security Number
  - b. Updated Psychological Medical Evidence
  - c. Academic History and Report Cards
  - d. Psychosocial History
  - e. Vocational Evaluation based on Law No. 263-2006
  - f. Copy of the Certification of Functional and Pre-Employment Academic Skills based on Law 53-2016.
  - g. Copy of the Individualized Educational Program (PEI)
  - h. Services Plan. Section 504 or others that apply
  - i. Any other document that applies

In the case of pre-employment transition services, the Department of Education will offer and certify the following information:

- a. Student's Social Security Number
- b. Date of birth
- c. Age
- d. Race
- e. Ethnicity
- f. School of origin and town
- g. Town of residence of the student
- h. Grade enlisted
- i. If the student receives special education or Section 504 services
- j. 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.
- (B) the provision of consulting and technical assistance to assist educational entities with transition planning for students with disabilities, between school and post-school activities, including the receipt of Vocational Rehabilitation services;
- See section VINR(d)(2), previous.
- (C) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Please, refer to previous section.

(D) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Please, refer to section d.2.

(E) procedures for outreach to and identification of students with disabilities who need transition services.

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:
  - a. When advice is needed about functional limitations caused by the student's physical or mental disability; and
  - b. 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.

## (A) COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Approval of Proposals:

In 2019, the ARV 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 ARV has the following guides:

- Proposal to offer services to ARV consumers under the Sustained Employment Modality;
- Guide for the preparation of proposals to offer Pre-Employment Transition services (workshops / training / orientations); and
- Guide for the preparation of proposals to offer Pre-Employment Transition services (fairs).

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 ARV 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 ARV 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

#### (B) ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

In accordance with the above, the ARV has a process for contracting sustained employment services. These services are offered by Community Rehabilitation Programs (PRC), which must follow the process established by regulation for their hiring.

- The hiring process begins with a Public Notice in written press, which establishes the deadlines for the collection of the Proposal Guide to Offer Sustained Employment Services to the consumers of the Vocational Rehabilitation Administration and the date for delivery of the proposals. Once both processes have passed, a Proposal Review Committee analyzes them and, based on the results, makes recommendations to the Administrator, then beginning the hiring process.
- The ARV through the Personnel of the Office of Support and Employment Modalities (OAME) will make two visits of Programmatic Monitoring during the term of the contract. The preliminary monitoring will observe the progress the organization has made, and the final monitoring will determine if the organization met the established goal. In addition, both OAME staff and Support Analysts and Employment Modalities provide technical assistance to PRCs, as necessary, throughout the service delivery process.
- The ARV continues to collaborate with other private nonprofit organizations to ensure the availability of sustained employment services and the development of extended support services to consumers with more significant disabilities.
- The ARV will continue hiring the PRCs for the provision of sustained employment (ES) services. In addition, Normative Communication No. 2018-01 was developed, which establishes the process for the provision of extended support services to be offered by the PRCs.

The ARV will continue hiring the PRCs for the provision of sustained employment (ES) services. In addition, it will establish the process for the provision of extended support services to be offered by the PRCs. Also, continue with the following activities:

- Offering technical assistance to employers, as required, to promote extended support options through orientation activities to employees / coworkers interested in collaborating with the process and identifying resources available in the workplace and community.
- Collaboration with the community rehabilitation programs (PRC), if required, in efforts to prepare and submit proposals for the provision of extended services to other sources of available funds.

## (C) COORDINATION WITH EMPLOYERS

Describe how the Designated State Agency will collaborate with employers to identify opportunities for integrated competitive employment and career exploration so as to facilitate the provision of:

(1) VR services; and

The ARV continues to work with employers to identify opportunities for integrated competitive employment and career exploration. For this purpose, it has Support Centers and Employment Modalities (CAME), 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.

CAMEs 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 ARV and qualified candidates are marketed.

On the other hand, as part of the Memorandum of Understanding with the Single Management Centers, we will stipulate that they will share their network of employers, so that they can be contacted by CAME staff to facilitate the provision of rehabilitation and transition services that are necessary,

The State Rehabilitation Council also supports the efforts of the ARV in contacting employers through a membership with the human resources organization SHRM.

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

In compliance with WIOA, the ARV 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 Here are some of the activities carried out:

1. In June 2017, the agency developed a Collaboration Agreement between the Vocational Rehabilitation Administration, Department of Labor and Human Resources and the Department of Education of Puerto Rico to provide a Work-Based Learning Experience for students with Disabilities in Process of Transition for post-secondary life.

2. The PR SAM Sample (Puerto Rico Skills Assessment Module) was acquired. Acquired tests will allow to offer career exploration services to students in transition between 14 and 21 years of age who receive or receive special education services or under Section 504 of the Rehabilitation Act of 1973, as amended. Students who are in school were impacted like those in post-secondary education.
3. In June 2017, Cooperative Commitments were made with private employers to obtain real work scenarios to carry out Work-Based Learning Experiences to students who are possible candidates for vocational rehabilitation services and to those who are applicants / consumers with disabilities Served by the agency.
4. A Learning Experience was offered for 58 students with disabilities with 6 private employers in the month of June 2017. (Duration 20 days).
5. In July 2017, Cooperative Commitments were made with Government Agencies, Public Corporations and / or Municipalities to obtain real work scenarios to carry out Work-Based Learning Experiences to students who are possible candidates to receive vocational rehabilitation services and students who are applicants / consumers with disabilities served by the agency.
6. In the month of July 2017, a Learning Experience was offered for 2,100 students with disabilities in corporations and government agencies.
7. In August 2017, a Service Fair was held for 600 students with disabilities under the category of Career Exploration Counseling.
8. Transition analysts are offering guidance to schools on pre-employment transition services.
9. In November 2017, training contracts were made to offer pre-employment services in the schools of the Department of Education (12 contracts).
10. In December 2017, four service fairs from 30 that were scheduled until September 30, 2018 were given. It is projected to serve over 10,000 students with disabilities from the Department of Education and Section 504.
11. In January 2018, training for Pre-ETS services in different schools began, covering the six regions of the ARV. 2,400 students with disabilities from the Department of Education are expected to attend until September 30, 2018,
12. The ARV in Fiscal Year 2018 hired five (5) service providers resulting in the impact of 8,007 students with disabilities who participated in pre-employment transition service fairs in which they had the opportunity to explore the career, obtain information of the most demanded careers, academic offers, and about the qualities and skills that employers look for. For Fiscal Year 2019, it hired eight (8) service providers that have hit 4,342 students with disabilities between the ages of 14 and 21 inclusive. The totality of the students impacted at the moment with these Fairs is: 12,349.

13. The ARV in Fiscal Year 2018 hired 11 service providers which resulted in the impact of 1,685 students with disabilities who participated in workshops and training to explore the career, learn technological, social and independent living skills and to know their rights to intercede for themselves. For Fiscal Year 2019, the number of contracted service providers was four (4) so that students with disabilities from 14 to 21 years old even explore the career by administering proof of vocational interests and providing information on the labor market of Puerto Rico and the United States. At the moment 637 students have impacted. The totality of students with disabilities impacted with these workshops so far is: 2,232.
14. Between June to August 2018, 2,992 students with disabilities participated in a Work-Based Learning Experience in a real competitive and integrated work environment for the development of pre-employment skills. These experiences were provided by 106 public and private employers in Maintenance Worker, Office Assistant, Domestic Animal Care, Agricultural Worker and Painter Assistant occupations. For these purposes, collaboration agreements were signed for the provision of this experience with effect until 2020. As for Fiscal Year 2019, 262 students with disabilities have been impacted with the Work Based Learning Experience in Municipalities and agencies of the Government of Puerto Rico. The totality of students with impacted so far is: 3,254,
15. Through the initiative to provide services to explore the career, 491 students with disabilities in Fiscal Year 2018 were impacted by the Vocational Assessors of the ARV by administering tests of vocational interests and by the Rehabilitation Counseling Services Analysts who provided information on the requirements of careers and the labor market. For Fiscal Year 2019, 695 students with disabilities between 14 and 21 years of age have been impacted so far, including those with significant cognitive impairments. The totality of the cases impacted with this project was: 1,186.
16. The ARV named in Fiscal Year 2019: 41 direct service professionals to applicants! consumers with disabilities with salaries paid by federal funds, such as; Counselors in Vocational Rehabilitation, Principal Counselor, Supervisor of Counseling in Rehabilitation and of Assessment and Adjustment Centers fulfilling our ministerial duty to continue maximizing services to the population.
17. In the Centers / Units of assessment and Adjustment attached to the ARV, pre-employment services were provided in the social area and independent living, impacting:

Table 67. ARV Pre-Employment Services Provided

Fiscal Year	Population Served	Amount of services provided
2018	6,603	26,331
2019	2,561	8,673
<b>Total</b>	9,164	35,004

#### (D) INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

The PRVRA maintains a relationship of collaboration with the following agencies and organizations for the development of integrated competitive employment opportunities.

1. the State Medicaid plan under title XIX of the Social Security Act;

The PRVRA established contact with the Director of the Policies/Procedures and Operations of the Medicaid Program under the Department of Health, administering the Medicaid under Title XIX of the Social Security Act. 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. The parties are in the development of a Collaborative Agreement.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

The PRVRA participates actively in the meetings of the State Council on Developmental Disabilities (SCDD), as well in activities that promote employment opportunities for this population. It also shared its employers' list with the SCDD and PRVRA staff is available to support their efforts in order to develop competitive integrated employment opportunities.

3. the State agency responsible for providing mental health services.

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 PRVRA is a mandatory member of this council and participates in the planning for the provision of these services.

PRVRA 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:

- Participate in the writing and implementation of the Block Grant, in accordance with Section 1915 (a) of the federal law.
- Participate in the development of the State Plan for the Mental Health and Substance Abuse Services Administration.
- Review and evaluate adequacy and distribution of mental health and substance abuse services in PR to identify service needs.
- 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 PRVRA, are: 1. Attend meetings 2. Active participation in deliberation and vote processes 3. Staying informed and updated about interests' issues 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 PRVRA 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 PRVRA 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.

#### (E) COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

The PRVRA institutional mission is the provision of vocational rehabilitation services aimed at the successful integration of the people with disabilities to the country's workforce and the enjoyment of a more dependent life. With this purpose, the PRVRA has professionals committed to the public service duty qualified to attend in an agile and responsive manner, vocational rehabilitation and independent life needs of people with disabilities, with priority to those with more significant disabilities.

In order to ensure that we have the best qualified and warmly trained staff to provide services to people with disabilities, we offer professional development opportunities to our human resources. Also, we take into consideration your needs and recommendations for the best functioning of the agency.

##### (1) Data System on Personnel and Personnel Development

(a) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

- i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The PRVRA's institutional mission is to provide VR services aimed at the successful integration of people with disabilities into the labor force and towards the enjoyment of a more independent living. With that purpose, the agency has professionals committed with public service, duly qualified to meet, in an agile and responsive way, the VR and independent living needs of people with disabilities, with priority to the needs of those with the most significant disabilities.

In order to ensure 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. We also take into consideration their needs and recommendations for the best performance of the agency.

In order to articulate the operation of the agency in response to the needs of the population attended, the PRVRA requires professional staff related to the rehabilitation field occupying different positions, as well as other support and administrative staff. The support professionals also provide direct service to the applicant/consumer; while the administrative ones contribute to the continuity of other processes needed for the operation of the agency and the achievement of its programmatic goals.

**Table 68. Breakdown Counselors and New Work Zones**

<b>Fiscal Year</b>	<b>Total zones in the period</b>	<b>New zones</b>	<b>New VR counselors</b>
2019	154	3	0
2018	151	0	0
2017	151	0	0
2016	151	0	0
2015	152	0	17

Source:PRVRA

It is estimated that in one year the average caseload will be between 400 cases.

**Table 69. Breakdown Average Caseloads for CRV, 2015-2019**

<b>Fiscal year</b>	<b>Number of zones</b>	<b>Active caseload</b>	<b>Cases closed</b>	<b>Population served</b>	<b>Average caseload</b>
<b>2019</b>	154	54,002	6402	60,404	350
<b>2018</b>	151	53,753	6306	60,249	356
<b>2017</b>	151	54,104	7278	61,382	354
<b>2016</b>	151	53,436	8292	61,728	340
<b>2015</b>	152	51,383	7788	59,170	333

Source:PRVRA

The PRVRA is strengthening its work teams to provide agile and responsive services to the needs of people with disabilities. At the moment, the agency has 130 VR counselors managing cases. To provide other services needed in the rehabilitation process (assessment and employment-related services, among others), the agency has 268 support staff.

The following section shows a breakdown of PRVRA staff, by category, vacancies and projected employees who qualify for retirement over the next (5) years:

**Table 70. PRVRA Staff by Category**

<b>Staff category</b>	<b>Total positions</b>	<b>Current vacancies</b>	<b>Projected vacancies</b>
Counseling staff	130	29	10
Support staff	268	115	30
Administrative staff	295	138	9
Other staff	0	0	0
<b>Total</b>	<b>693</b>	<b>283</b>	<b>49</b>

Source:PRVRA

- ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

For reference, see the table 65 for the current and projected vacancies.

- iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Please, refer to section above.

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

The Agency has a computerized registry of trainings provided to the employees. Their needs are identified through performance evaluations or supervisors' recommendations, and trainings are provided to address those needs. Also, some employees require professional licenses to perform their duties, and for that reason the Agency makes sure they comply with the requirement and provides the opportunity to participate in continuing education trainings for their license renewal.

Puerto Rico has various institutions of higher education that are preparing professionals in the rehabilitation field. The PRVRA has agreements with three (3) 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 PRVRA recruits graduates from these institutions and others:

- University of Puerto Rico (UPR)- is the only public institution of higher education in the country. 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 the Graduate Program in Rehabilitation Counseling
- Bayamón Central University has the following programs: Graduate Program in Rehabilitation Counseling; Bachelor's degrees in Psychology; Bachelor's degree in Social Work; Vocational Rehabilitation Certification; and Visual Impairments Certification

- ii. the number of students enrolled at each of those institutions, broken down by type of program; and

University of Puerto Rico Recinto de Río Piedras: Graduate Program in Rehabilitation Counseling: 111 enrolled students

University of Puerto Rico, Medical Sciences Campus: 430 enrolled students in the following programs: Occupational Therapy (41); Physical Therapy (50); Master's degree in Speech Pathology (29); and Nursing (310)

Pontifical Catholic University of Puerto Rico: 73 enrolled students

Bayamón Central University: 212 enrolled students in the following programs: Graduate Program in Rehabilitation Counseling (29); Bachelor's degrees in Psychology (72); Bachelor's degree in Social Work (98); Vocational Rehabilitation Certification (12); and Visual Impairments Certification (15).

- iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

University of Puerto Rico (UPR) - At the Río Piedras Campus, Graduate Program in Rehabilitation Counseling 21 graduates. *Staff category: Counseling*

UPR, Medical Sciences Campus- 138 graduates in the following programs: Occupational Therapy (13 graduates); Physical Therapy (0 graduates); Master's degree in Speech Pathology (10 graduates); and Nursing (115 graduates). *Staff category: Support*

Pontifical Catholic University of Puerto Rico (Ponce)- 39 graduates in the Graduate Program in Rehabilitation Counseling. *Staff category: Counseling*

Bayamón Central University- 51 graduates in the following programs: Graduate Program in Rehabilitation Counseling (12 graduates); Bachelor's degrees in Psychology (10 graduates); Bachelor's degree in Social Work (35 graduates); Vocational Rehabilitation Certification (13 graduates); and Visual Impairments Certification (3 graduates); *Staff category: Counseling & Support*

- (2) Plan for Recruitment, Preparation and Retention of Qualified Personnel. Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

The PRVRA, through the Office of Labor Affairs and Human Resources and its divisions, has the responsibility of developing, updating and implementing a plan for the recruitment, preparation and retention of qualified personnel to meet current and projected needs of staff. To comply with such requirement, the agency will continue with the development of the following procedures and activities:

- Identification and communication of needs concerning the recruitment, reclassification, training or any other requirement related to human resources;

- Analysis and development of strategies based on the needs concerning the recruitment, reclassification, training or any other requirement related to human resources;
- Realignment of personnel to fill vacant positions in the centers providing services to consumers (centers offering VR counseling services, assessment and adjustment, support and employment modes). Although this strategy responds to the current public policy of economic austerity, it also propitiates the development of employees while taking care of the staff needs of the agency;
- Offering of advice and support on issues concerning the best use of human resources, particularly those assigned to the provision of direct services to meet the needs of the consumers;
- Provision of advice and support on issues concerning the management of human resources of the agency, maintaining a close coordination with the programmatic area of the agency;
- Planning and provision of human resources (involves the analysis; design; establishment and elimination of positions; selection and recruitment; and the implementation of a system of personnel evaluation);
- Maintenance of a human resources inventory that involves the classification of positions, existing vacancies, identification of candidates for retirement and succession planning. This information is analyzed on an annual basis to determine employment patterns, positions that are hard to hire and number of employees with 25 or more years of service;
- Forecasting of human resources needs (within a period of 1 to 5 years), by number and type of employee, emphasizing on the personnel that offers direct services to people with disabilities;
- Provision of training and promotion of staff development;
- Establishment of objectives and training activities to be offered to staff in order to comply with programmatic/administrative commitments of the agency;
- Coordination of staff training activities with universities and other institutions preparing professionals related to the rehabilitation field; and
- Maintenance of efforts to continue recruiting qualified staff with disabilities. The PRVRA has VR counselors who have various disabilities. It also continues emphasizing on compliance with Law 81, as amended, known as the Law of Equal Employment Opportunity for Persons with Disabilities. As part of the evaluation of

examination requests, five (5) additional points are granted to anyone who shows evidence of having some type of disabling condition.

The PRVRA recruits without distinction of age, race, color, gender, social or national origin, and social condition, political or religious beliefs. Our agency recruits based on qualifications of applicant. The Puerto Rico PRVRA is the only Designated State Unit of the nation where more than 99% of its population is minority (Hispanic and/or Spanish-speaking).

The PRVRA has agreements with three (3) 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 PRVRA recruits' graduates from these institutions, particularly from the following: University of Puerto Rico (UPR), Pontifical Catholic University of PR (Ponce), and Bayamón Central University, among others. Training is provided to VR staff through: College of RC Professional of PR, National Council of Rehabilitation Education (NCRE), American Deafness and Rehabilitation Association, to name a few.

- (3) Personnel Standards. Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:
- (A) standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

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 PRVRA 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.

The PRVRA has developed the following strategies to maintain personnel standards consistent with the highest state requirements applicable to a specific profession or discipline:

- Annual review of certifications, licenses, and continuing education of specific professions or disciplines;
- Continuation with the provision to staff of training necessary for the optimal performance of their duties;
- Maintenance of an updated record on training and workshops, and education activities among others, provided to the agency staff;
- Identification of retraining needs of the agency staff in order to strengthen the performance of duties; and
- Annual performance evaluation of the staff.

The following is a list of professional associations related to the rehabilitation field available to provide training to staff:

- College of Rehabilitation Counseling Professionals of Puerto Rico- (VR counselors);
- National Council of Rehabilitation Education (NCRE)- (educators in rehabilitation and staff related to the training of rehabilitation professionals, among others);
- American Deafness and Rehabilitation Association (ADARA)- (staff related to services to the deaf);
- Association of Persons in Supported Employment (APSE)- (staff related to supported employment services, among others);
- National Council on Independent Living (NCIL)- (staff related to independent living services);
- California State University at Northridge (CSUN)- (VR professionals in assistive technology);

- Rehabilitation Engineering and Assistive Technology Society of North America (RESNA)- (VR professionals in assistive technology);
- College of Occupational Therapy Professionals of Puerto Rico- (occupational therapists and occupational therapy assistants);
- College of Social Work Professionals of Puerto Rico- (social workers);
- Association of Employee Assistance Professionals of Puerto Rico- (central level staff of the Employee Assistance Program);
- Administration of Mental Health and Anti-Addiction Services (ASSMCA, in Spanish)- (staff of the Employee Assistance Program);
- Academy of Audiology of Puerto Rico- (audiologists);
- Puerto Rico Assistive Technology Program (PRATP)- (occupational therapists, speech/language pathologists, and audiologists, among others);
- Puerto Rico Registry of Interpreters for the Deaf- (interpreters for the deaf); and
- Puerto Rican Physiotherapy Association- (physical therapists and physical therapy assistants).

(4) Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

(A) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

As established in the Procedures Manual for the Training of All Staff of the Vocational Rehabilitation Administration, the PRVRA promotes and emphasizes on 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; and

- Planning of training activities as a result of the needs identified in the needs assessment study, monitoring reports and performance evaluations

The following is a breakdown of some of the training activities offered to the rehabilitation counseling staff and other related professionals during 2017 (Topic | Participants):

- Training for Transition Analysts on Transition Services Pre-Employment/ 12
- Training on Compliance with Goals for Counseling Personnel/ 24
- Training on the Impact of the WIOA Law (management staff)/ 12
- Workforce Innovation Technical Assistance Center (WINTAC) Training/ 475
- Training of Professionals of the Assessment and Adjustment Centers on: Pre-employment skills for students in the process of transition to adult life and the importance of the occupational match from the perspective of the Counselor in Vocational Rehabilitation in planning occupational goals/ 15
- VALPAR System Work Samples/ 18
- Training on Communication Regulations 2018-02: Procedure for the Use of Test Work Experiences (ETP); and Collaborative Agreement: Referral Form for Transition Services Pre-employment/ 70
- Guidance to professionals in the area of counseling in relation to compliance with the Interagency Agreement of Services Provided Injured Workers between the ARV and the State Insurance Fund Corporation/ 45
- Training for CAA-UAA professionals: Characteristics and Functioning of the Person with Autism, Intervention Strategies for the Evaluation Process and Skills Development/ 51
- Orientation in sign language on natural phenomena to interpreters in signs of the ARV/ 4
- Second Conference: Vocational Evaluation Symposium: Change Strategies/ 21
- Guidance on the Unified State Plan and Strategic Plan for Management Personnel/ 26

The Office of Labor Affairs and Human Resources coordinated 160 training activities for ARV personnel, some of the topics were: Disaster preparedness, New trends and challenges in human resources management, Second symposium of vocational evaluation, Rapid response in situations of suicidal behavior, Inclusion and integration in society, Conflict management social evolution, Assertiveness and resilience in times of change, Technological assistance in communication, The agency's management staff was directed to Memorandum No. 11-2018 of the Office of Administration and Transformation of Human Resources of the Government of Puerto Rico, related to the update of the Employee Duties Sheet 2,039

Trainings to the newly recruited VR counselors was broadened to cover in detail the following aspects: services provision process and federal regulations; assessment and adjustment services; support and employment mode services; productivity indicators; use of the computerized system to provide services; data on the federal RSA-911 Report; fiscal and budgetary aspects of the services provision process; independent living services; and the State Plan. Each topic is presented by the staff of corresponding areas, which allows employees to become familiar with the central office.

Assistive Technology Program (PRATP) established under Act No. 264 of 2000 known as the "Act for the Puerto Rico's Assistive Technology Program" as amended, has the responsibility to promote changes in public and private systems for inclusion, independence and self-sufficiency of people with disabilities through AT use. According to this mandate the PRATP keeps collaborative agreements with government agencies. The PRVRA has maintained agreements with PRATP to exchange resources, knowledge and experiences about AT topics.

PRVRA offered AT services at their six regions under the following categories: visual, hearing, mobility, communication, independent living, cognitive, and computer access. Services are offered by Occupational Therapists, Physical Therapists, Audiologists, certified teachers, Speech and Language Pathologists, Blind Services and Visual Rehabilitation Specialists. Those professionals have the required credentials. By providing AT services, professionals keep up to date in knowledge. To that effect, the Agency benefits from collaboration with PRATP because their specialists offer trainings to VR staff about 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; and
- Those trainings and others provided by the VRA have contributed to keeping VRA staff skills and knowledge updated, having an impact on AT service delivery to applicants/consumers, facilitating employment outcomes and independent living.

- (B) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

For the purpose of acquiring and disseminating significant knowledge of research and other sources to professional and paraprofessional staff of the agency, the PRVRA has established the following procedure:

1. Presentation to staff of the findings of the Comprehensive Needs Assessment Study of Rehabilitation Needs.
  2. Send, by internal email, links to articles or information resources related to the rehabilitation field.
  3. Agreement 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. Permission for staff participation in continuing education courses, many of which contain information and strategies based on evidence.
- (5) Personnel to Address Individual Communication Needs. Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The agency, in its vision to be the lead agency in the provision of services to people with disabilities, provides staff with the necessary training and workshops to meet the communication needs the deaf, blind and deaf/blind applicants/consumers. For this reason, the agency staff participates in training activities related to such communication needs. At the same time, the agency has six (6) interpreters for the deaf whose services can be used, when necessary, to service applicants or eligible consumers; as well as four (4) interpretations service contracts to meet the communication needs our consumers.

Because Puerto Rico is a Spanish-speaking country (English is used as second language), we can communicate in the native language (Spanish) of our applicants/consumers. However, if an applicant/consumer speaks only English, we can also communicate in that language. In addition, the PRVRA can provide clients with alternative formats of communication such as Braille and large print, among others.

The PRVRA installed a video interpretation system through its facilities, which ensure communication with the deaf population, even if the interpreter is not physically present at the place where the applicant/consumer is requesting service.

- (6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

In Puerto Rico, the Assistant Secretariat of Comprehensive Educational Services for Persons with Disabilities and the PRVRA are located 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, we have State Law 51-1996, as amended, known as the Integral Educational Services for Persons with Disabilities, which provides for the coordination to be achieved between various local agencies to ensure an effective transition of disabled youth 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 numerous in-service 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 Investment Act (WIA), Public Law 105-220 of August 7 of 1998, as amended; 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 PRVRA has the responsibility to provide follow up to the cooperative link with the PRDE. As part of this commitment, during PY 2017, the agency participated in meetings with the Advisory Committee of Special Education.

## (F) STATEWIDE ASSESSMENT

- (1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:
- (A) with the most significant disabilities, including their need for supported employment services;

At present, the VRA hired a new entity to carry out the Comprehensive Study of Rehabilitation Needs of People with Disabilities:

As requested by the VRA and the State Rehabilitation Council (SRC), the Rehabilitation Counseling Graduated School of the University of Puerto Rico (CORE-Spanish acronym), Río Piedras Campus, carried out the Comprehensive Statewide Vocational Rehabilitation Services Needs Assessment between 2016 and 2017. Specific goals and objectives were established by agreement between representatives of VRA, SRC and CORE.

VRA and SRC determined that the rehabilitation service needs, for the purpose of this investigation, were going to be established from the opinions or comments received from vocational rehabilitation professional experts, with a vast experience on the field. These professionals are already working at the VRA and have a vast knowledge and experience that allows them the ability to formulate opinion criteria. The study also involved a sample of professionals currently working at the P.R. Department of Education having direct experiences in attending student needs, especially those with disabilities and receiving Vocational Rehabilitation transition services.

The empirical evidence gathered during the quantitative phase of the investigation, was the result from the administration of Survey-Type Instruments for Specialized Professionals in the service delivery to students and other people with disabilities from the VRA and the Department of Education (DE). Evidence gathered during the qualitative phase was the result of the participation of diverse sectors in Focal Groups. Sectors who participated in the Focal Groups were defined by the VRA and SRC, and included: VRA and DE staff, representatives from other WIOA/AJC programs, Vocational Rehabilitation participants/consumers, parents (of students with disabilities) and a representation from representatives of community organizations that serve as advocates for people with disabilities. The findings obtained as a result of the investigation's qualitative component, let the investigators know about the correspondence between the arguments presented by each sector, and the results of the quantitative phase surveys.

### **Quantitative Phase – VRA Staff Survey**

By consensus of the VRA staff and that from the SRC, three (3) versions of the need survey were developed for the VRA's professional staff. The survey was named "*Encuesta para Profesionales de la Administración de Rehabilitación Vocacional Sobre las Necesidades de los Estudiantes y Jóvenes con Impedimentos en Cuanto a Servicios de Transición Pre-emplero, Servicios de Transición y Otros Servicios de Rehabilitación Vocacional*" [Survey for Professionals at the VRA Regarding Students and Youth with Disabilities Needs of Pre-Employment Transition Services, Transition Services and Other Vocational Rehabilitation Services]. The three (3) versions correspond to the following three professional groups: 1.

Survey for VRA Professionals in Transition Analysts Positions - TA Form; 2. Survey for VRA Professionals Working in the Evaluation and Adjustment Center (CAA, by its acronym in Spanish)- CAA Form; and 3. Survey for VRA Professionals (Vocational Rehabilitation Counselors in a variety of functions and roles) - General Form.

### **Survey for VRA Professionals working as Transition Analysts - TA Form**

Form TA of the survey was a specifically developed version, to know the opinion of the VRA's professionals' working as Transition Analysts (TAs). The object of the opinions in Form TA, be it the persons about whom the professionals participating in the study think about the needs of services, were divided into three subgroups, representing the three survey areas. The sections were as follows:

- SECTION A: Survey for the Vocational Rehabilitation Professionals regarding Pre-Employment Transition Services Needs of students with disabilities receiving services from the Department of Education and other Educational Programs.
- SECTION B: Survey for VRA Professionals regarding Other Vocational Rehabilitation Services Needs for students and youth up to 24 years of age, already VRA consumers.
- SECTION C: An instrument for Transition Analysts regarding Related Subject-Matters of Transition Service Coordination.

### **Survey for VRA Professionals Working at the Evaluation and Adjustment Centers - Form CAA**

Form CAA of the survey was a specifically developed version, to find out the opinion of VRA Specialists' working at the Evaluation and Adjustment Centers (CAA, by its acronym in Spanish). The object of these opinions in form CAA, be it understood to mean persons over which professionals have opinions regarding service needs, were divided into two (2) sub-groups representing 2 sections of the survey. The following are the two sections:

- SECTION A: Survey for VRA Professionals regarding Pre-Employment Transition Services Needs of students with disabilities receiving services from the Department of Education and other Educational Programs.
- SECTION B: Survey of VRA Professionals regarding Other Vocational Rehabilitation Services Needs for students and youth up to 24 years of age, already VRA consumers.

These sections were the same as in the survey given previously to Transition Analysts. The survey included open opinion questions and recommendations, to improve Transition services, and others.



### **Participant Description in Form CAA:**

A total of 43 professionals ascribed to the CAA answered the survey. The majority of the participants, 57% (22) indicated having between 17 and 24 years working at the VRA, while 21% (8) indicated having 25 years or more working at the VRA. 22% (8) indicated having 16 years or less working at the VRA. With regards to the professional group they belong to, the sample was set as follows: Occupational Therapists 19% (8); Occupational Therapy Supervisors 2% (1); Vocational Evaluators 28% (12); Vocational Evaluation Supervisors 2% (1); Teacher 19% (8); Evaluation and Adjustment Official 5% (2); Evaluation and Adjustment Technicians 7% (3); Evaluation and Adjustment Assistants 5% (2); Other 7% (3); and Did not answer the question 7% (3).

### **Survey for VRA Professionals - General Forms**

The survey's General Form was a version specifically developed to gather the opinions of the following VRA specialists working at the VRA: Vocational Rehabilitation Counselors in a variety of functions and roles (Case Managers, Transition Analysts, Support and Employment Mode Analysts; Vocational Rehabilitation Counseling Supervisor, Directors of the Counseling Service Centers and Directors of Support and Employment Modes Centers (CSEM). The object of their opinions in the General Form, be it understood to mean persons over which professionals have opinions regarding service needs, were divided into 4 subgroups representing 4 of the survey's sections. These sections were:

- SECTION A: Survey for VRA Professionals regarding Pre-Employment Transition Services Needs of students with disabilities receiving services from the Department of Education and other Educational Programs.
- SECTION B: Survey for VRA Professionals regarding Other Vocational Rehabilitation Services Needs for students and youth up to 24 years of age, already VRA consumers.
- SECTION C: Survey for VRA counselors (Case Managers) and professionals from the Centers of Support and Employment Modes (CSEM) regarding Supported Employment and other VR services needs for consumers with more significant disabilities.
- SECTION D: Survey for VRA Counselors (Case Managers) and professionals from the CSEM about the need to establish, develop or improve Community Rehabilitation Programs (CRP).

### **Section A: Part I - Description of the participants who answered the General Form**

To generally describe general characteristics of participants, the following aspects were analyzed: sex, age, years of service at the VRA, title or position occupied, and the VRA

region where located. A total of 160 persons answered the General Form. Among participants, a total of years-in-service at the VRA was observed with 39.5% reporting between 1 to 8 years; 23.1% between 9 to 16; 32% between 17 to 24; and 5.4% indicated having 25 or more year in VRA's service. As per the title or position held at the VRA at the time of the survey, 116 (75%) were observed to have been rendering Vocational Rehabilitation Counseling functions as Case Managers; 3 (2%) were Vocational Rehabilitation Counselors rendering functions as Transition Analysts; 10 (6%) were Vocational Rehabilitation Counselors doing Support and Employment Modes Analyst functions; 14 (9%) were Vocational Rehabilitation Supervisors; 5 (3%) were Counseling Services Center's Directors; and 5 (3%) were CSEM Directors. A total of 3 (2%) indicated Other.

### **Survey for Department of Education (DE) Staff**

From a consensus of VRA and SRC, a version of the survey was developed to uncover the needs the DE staff could identify. The survey was titled "Survey for Puerto Rico's DE Professionals Regarding the Needs of Students with Disabilities for Pre-employment Transition Services" [*Encuesta para Profesionales del Departamento de Educación de Puerto Rico sobre las Necesidades de los Estudiantes con Impedimentos en cuanto a Servicios de Transición para Pre-empleo*]. The people on whom the DE staff gave their opinion were divided into several subgroups, which represent the various sections of the survey. The sections are:

- SECTION A: Data about the participants in the survey and their training needs.
- SECTION B: Survey for DE's Professional regarding Pre-Employment Transition Services Needs of students with disabilities who receive Special Education services in school.
- SECTION C: Survey for DE professionals, regarding Pre-Employment Transition Services Needs of students with disabilities who receive services under Section 504.
- SECTION D: Open for questions

### **Section A: Part I: Description of Department of Education survey participants**

In order to describe the general characteristics of the DE participants, the following were analyzed: sex, age, years-of-service at the DE, title or job held at the DE, and the region where the participant was working. A total of 81 professionals from 20 different schools answered the survey. The DE recommended and authorized the participation of 23 schools covering the Island: from which 20 participated. Five (5) questionnaires were given to each school for a total of 100. Of the 20 schools that agreed to participate, 81

questionnaires were answered for an 81% (81/100) participation index which may be considered a high response.

Among the participants working at the DE, the total number of years on the job was observed, and 30% reported between 1 and 8 years, 45% between 9 and 16 years, 11% between 17 and 24, and 14% indicated 25 or more years of service.

Regarding titles or job-positions held at the DE at the time the survey was administered, it was observed that 42 (52%) were Special Education Teachers, the largest group represented in the sample. Also, 12 (15%) were Professional Counselors, 8 (10%) were Social Workers, 5 (6%) were School Directors and 5 (6%) were Pre-Vocational Teachers. Of the total number of participants from the DE, 9 (11%) did not indicate a job position.

### **Qualitative Phase: Focal Group Analysis / Methodology**

The study's design was a mixed one. This type of investigation combined quantitative and qualitative investigation methods in different parts of the process. The needs assessment was subdivided into 2 parts. The first part constituted the quantitative part, consisted of surveys or questionnaires answered by different professional groups who specialized on rehabilitating people with disabilities. The second part qualitative, consisted of 5 focal groups composed of representatives from different sectors in society offering transition services from school to independent living, employment or post-secondary education for people with disabilities between the ages of 14 and 24.

The objective of the qualitative phase was not to generalize the results, but to go deeper into the quantitative phase findings, to identify the elements or factors the previous phase did not identify, and to be able to go deeper into the studied elements from the participants' perspective (Hernández y Baptista, 2014). The objectives and the questions are more in general than in the quantitative investigation. For this phase, as previously mentioned, the technique used was focal group.

The sample of this study is not probabilistic. Participants were selected with a purpose - because it was understood that they were capable of submitting opinions regarding the study, due to the role assumed, understood or adjudicated within the functions they perform in society. Therefore, we parted from the premise that it was an expert sample due to the functions they had performed, in relation to the transition process. The sample was also chosen by convenience and on a voluntary basis.

This is a heterogeneous among groups sample with a common denominator. The number of participants per focal group fluctuated between 4 to 14 persons, complying with the minimum sample size suggested for this technique (Hernández y Baptista, 2014). The first focal group included staff from the Department of Labor (DOL), municipalities and the DE, operating under the Workforce Innovation and Opportunity Act (WIOA) rules (2014):

Title I Programs - Youth, Adults and Dislocated Workers; Title II Programs - Adult Education; Title III Programs - Wagner-Peyser (WP), and Title IV Programs - Vocational Rehabilitation Administration (VRA). The second focal group consisted of advocates and service providers to school youth in transition to post-secondary education. The third focal group was made up of VRA consumers that received transition services from school to post-secondary education. The fourth focal group consisted of fathers, mothers and tutors of youth who currently, or that for the last three years, had been through the transition process from school to the VRA. The last group consisted of DE and VRA staff currently participating in transition processes.

The focal groups' analyses were made by group writing the manifest content of each response followed by a convergence and divergence analysis of the responses between and within groups, when applicable, because groups' questions could vary. This compiled information, at the same time, was analyzed by using a triangulation technique where the provisions of law contained in the applicable state and federal laws were used as the main source.

### **General Conclusions and Recommendations**

When arriving at general conclusions in a complex and extensive study, as the one at hand, risks that must be controlled become present. The study was a complex one, because it used mixed methodology (where qualitative and quantitative elements were integrated) and required safeguards when synthesizing the gathered information, since the internal and external validity of the study are different. At the same time, this was an extensive study, because it gathered input from four (4) professional sectors in the quantitative phase (heterogeneous among themselves, representing fifteen (15) specialties) for a total of 295 professionals (of which 81 were DE professionals and 214 belonged to the VRA), and five (5) sectors in the qualitative phase represented eight (8) sectors, among them professionals, parents or tutors and consumers for a total participation of 38 persons making up the focal groups.

The diversity created in the aforesaid suggests three (3) principles the reader must keep in mind when reading and analyzing the conclusions.

1. The general conclusions emanate from the analysis presented in this document, regarding each group or surveyed sector. Therefore, the reader will find specific conclusions in each of the document's sections.
2. The general conclusions mean to establish patterns or trends in the congruencies or divergences that result from the specific conclusions. Therefore, the general conclusions look to congruently integrate the study's general findings, and

3. The investigation carried out was specifically designed to identify pre-employment transition services needs and vocational rehabilitation services needs within specific groups, from the perspective of the experiences multiple sectors or professional groups may have had. As a consequence, the conclusions constitute the identified needs along the investigation. The conclusions are elaborated in such a way that they simultaneously suggest the recommendations, so as to pay attention to the indicated problems or needs.
4. All of the consulted sectors coincided in pointing out the need to improve or maybe develop from the beginning, inter-agency process coordination as a pre-requisite for pre-employment transition services to be offered according to law. The need to provide these services, and that there be more uniformity in their performance per region and include the active participation of consumers and their families, is inferred.
5. The limited interagency-coordination negatively affects and dilutes the services and eligibility processes at the VRA, maintaining inequity in services per regions and schools, while at the same time, promotes disinformation for future consumers, for their families and the academic staff.
6. One of the largest limitations in transition services delivery is constituted by an evident staff shortage in professionally-specialized personnel/staff not only at the VRA but also at the DE.
  - a. With respect to the VRA, evidence is clear that there are NOT enough Transition Analysts (TAs). Even though this professional is appreciated, valued and recognized for their professional undertaking in the consulted sectors, it is equally indicated that the VRA faces a major limitation in having so few of them. The need for the TAs to have a larger presence in schools in order to give service and perform closer and more frequent follow-up tasks for the consumers in their transition process was evidenced. The expectation among consumers, parents and school professionals with respect to the TAs will not be able to be satisfied with the present number of TAs available. At the VRA, the importance of executing a vocational evaluation was also pointed out, and thus, the need for having more of these specialists in every region, because of a late vocational evaluation, every rehabilitation process becomes diluted.
  - b. Regarding the DE, evidence is equally firm regarding the need for specialized professionals to attend students with disabilities needing

transition services. The need for additional professional counselors was evidenced, as well as the need for more rehabilitation counselors that must work from schools or academic regions, the need for independent living servicing specialists, and in particular, the need for vocational evaluators. Talking about vocational evaluators, the need for their services was evidenced by the absence of testing instruments and other evaluation tools required by law. The need to require and provide close, consequential collaboration between the DE and the VRA, was also identified.

7. Most of the sectors coincided when they stated that there is little participation or hardly any collaboration between parents and tutors during the transition services, as well as the occurrence of negative effects caused by that specific fact.
8. All sectors coincided in stating the fact that there is a lack of information continuity, regarding transition services; there is a lack of knowledge regarding what services are included; and in general, not many know of the vocational rehabilitation services offered at the VRA. Many sectors recommended the use of handbooks, whether in hard copy or in electronic format. At the same time, they requested continuous participation of TAs during orientation activities.
9. DE staff was emphatic when recognizing they need more formal training on Transition processes and services offered by the VRA. They recommend for training to be a continuous process that must be updated during the entire school year. That would create a more collaborative and effective staff during their transition procedure servicing.
10. VRA and DE staff recognized the need to increase and improve the independent living skills taught in schools, as well as the need to improve the pre-employment skills curriculum.
11. The need for transition services among students with disabilities was analyzed within the functions of the four (4) groups, or professional categories, be it: TAs, CAA, General and DE. The main results of said analysis are presented under section (j)(1)(E)- *Vocational Rehabilitation needs, among youth and students with disabilities including, as applicable, the need for pre-employment transition services, among other transition services.*
12. The needs of services were also analyzed according to the Region of the ARV in which the professional works. In this analysis, DE professionals were not included. The main results are presented in section mentioned above.

13. TAs were consulted about the frequency with which they can perform functions specific to their position. From the questions asked, the TAs pointed out: *Giving orientation to teachers, students, parents and other staff regarding students with disabilities referrals process, independent living and employment skills, eligibility criteria and vocational rehabilitation services* on an average of 3.91 which suggests that in their opinion, the frequency these services are given is adequate. This result must be analyzed carefully, because the impression in other sectors that were also consulted (DE, fathers - mothers, or tutors, consumers and the General Group) was that there is not enough staff to cover the services needed. The services: 4 - *To identify other students with disabilities who were not receiving Special Education but could be referred to the VRA*; 13 - *To prepare a preliminary analysis of the medical, psychiatric, social, vocational-academic and others obtained from the students' academic files, case discussions, COMPU meetings and interviews with parents-tutors*, and 15 - *To give technical assistance to CRVs the service delivery process for transition students with disabilities* obtained average scores suggesting that the frequency with which the service is offered is moderately adequate (3.0, 3.27, and 3.0 respectively). The services that obtained the lowest average scores were: 7-*To serve as a resource when planning innovative in- schools projects for transitioning students with disabilities* ( $X=1.82$ ) and 14-*To participate in interdisciplinary teams related to Work-based assessments* ( $x=1.50$ ), which suggests that the frequency with which the TAs carry out their tasks was described as inadequate or a little inadequate by the majority of the surveyed staff.
14. The General Group participants, VRA employees, were asked about Supported Employment needs for consumers with significant disabilities. The more important results of such analysis appear in section (j)(1)(A)- *Vocational Rehabilitation needs of those with more significant disabilities, including supported employment service needs*.
15. The VRA staff who participated in the survey was asked about sectors or groups not receiving services or who were receiving them below the expected level. The main results of the analysis are presented in section (j)(1)( C)-*Vocational Rehabilitation needs in persons with disabilities that could be, but are not being served or are receiving services below expected levels*.
16. The needs of particular groups of youth with disabilities:
- a. DE staff was asked about the transition needs of youth with disabilities under the custody of the Juvenile Institutions Administration [*Administración de Instituciones Juveniles*]. They emphasized on the importance of promoting

communication skills, or learning about money management, of showing appropriate conduct, and understanding interpersonal relationships. They pointed out the need to provide them with real job experiences through orientations regarding the world of employment, and to follow-up on their therapies and the evaluations that by law, this group of youths should be receiving.

- b. Regarding *Home Schooling* and their relationship with transition services, DE participants identified the needs: to provide social interaction and interpersonal communication skills; to work in groups; and to learn about their function in society, in their community coexisting with other youth. They indicated that their parents or their families are usually not aware of what Transition is, the services that are being offered by the VRA, the eligibility criteria, and the individuals' rights. They therefore recommend developing orientation and training strategies for parents. The staff also identified as a limitation the lack of formal diagnoses and the limited therapeutic services for these young people
- c. This professional staff understands that private or public school youth are being shoved between the importance and the guarantee of the services these students with disabilities are entitled to, are offered, and could be available. In a very particular way, they pointed out that reasonable accommodations as a service are not equally provided as per student needs and rights. They pointed out that schools are currently having a lack of specialized staff with sufficient knowledge about vocational evaluations and related matters. To that effect, they recommend the VRA staff to play a more active role by visiting schools, with the main objective of giving orientation and disseminating information regarding the VRA services offer.

17. The general conclusions reached by these focal groups were as follows:

- a. Focal Group Number 1 - Consisted of PRDOLHR, municipality and DE staff, all operating under WIOA(2014): Title I Programs - Youth, Adults and Dislocated Workers; Title II Programs - Adult Education; Title III - Wagner-Peyser (WP); and Title IV - Vocational Rehabilitation Administration (VRA). See section (j)(1)(D)-*Vocational Rehabilitation needs for individuals with disabilities, served by other workforce system components*.
- b. Focal Group Number 2 - Advocates and those servicing to a transitioning population, from school to post-secondary life. The expressions of Focal Group 2 help us arrive at the conclusion that according to participant



experiences, the DE is not implementing independent living skills because it does not have the resources, and the ones they do have, are damaged. They are also, not implementing pre-employment skills as required by law. PEI includes these services which are scarcely offered, because their institutional priority seems to be on academic skill-development. In the PEI development processes, student participations seem to be minimal. Even though in PEI, the parents are the students' representatives, they sometimes act as facilitators, just as well as barriers in transition procedures; some due to their overprotection and others for lack of interest. The amount of TAs at the VRA is not enough; and their participation in COMPU meetings is minimal, all in comparison to what is expected of parents and professionals alike, according to legal mandate.

- c. Focal Group Number 3: VRA consumers who received transition services from school to post-secondary education. This group agreed with those in Groups 1 and 2 when they established that the transition process does not begin at age 16 or at age 14, if necessary, but that it varies from case to case. Pre-employment and independent living skills are not being fully developed. The TAs are not enough to carry out transition work, and in the majority of cases, they arrive at the VRA as self referrals. Participants agree when saying that there is a definite need to increase TAs and Rehabilitation Counselors (RC) in schools in order to make the transition process a bit smoother. They also point out that the process of selecting the vocational goal is not uniform. Most participants are satisfied with the services they receive in the ARV after being eligible, except for delays in vocational evaluations, maintenance and transportation payments, purchase of materials and placement process. Participants recognized that parental over protectiveness, in occasions, can limit participant development.
- d. Focal Group 4 composed of fathers, mothers and tutors: This group achieved consensus regarding the DE, with regards to the fact that they are non-compliant with state and federal statutes, same as with other state agencies under Law 51, signed in 1996. Participants concur in that the DE and the VRA are not starting their transition services on time, and what the PEI goes about doing, does not always materialize. Participants added that interagency coordination is inefficient, and that the DE is inadequately developing skills in independent living and pre-employment. Vocational evaluation procedures were pointed out as also being given inefficiently, because they don't have a specially trained staff, nor do they have an

adequate, evaluation system. TA participation at the COMPUs is not enough, and VRA's evaluation procedures delay too much. Transition procedures must be based on functionality and not on limitations. The integration of RC in schools is recommended to help in the identification of necessary skills in the PEI and to put them into practice in a sensitive and accessible way.

- e. Focal Group Number 5: DE and VRA staff participating in current transition processes In Focal Group 5 participants concurred in saying that the transition process varies according to scenario, resources, and student needs. Not always are the services rendered, according to current law. TAs participation in COMPUs is insufficient, so VRA must hire more TAs. DE must recruit RCs to work from the schools themselves. The DE's Vocational Evaluation units do not have the necessary staff, nor the necessary evaluation system. According to participants, independent living (IV) skills and pre-employment are hardly developed by the DE. They concur saying that their priority is in academics, and that the DE does not have an IV nor a pre-employment curriculum. The DE does not contemplate a future for those with more significant disabilities, reason for their remaining at home after reaching 21 years of age. The group comes together when they state that the DE staff should be academically trained to work with people with disabilities. All those involved must have knowledge about the transition process, although at this moment it is not a uniform process and many agencies are non-compliant or create barriers in the process. This group concurs with the previously stated fact that parents may become facilitators, as well as steppingstones or turn into steep barriers for their own children to overcome in the process.

### **Vocational Rehabilitation needs of those with more significant disabilities, including supported employment service needs**

The professionals that made up the General Group, of which 75% came from CRV Case Managers, were asked about supported employment and other VR services needs of people with most significant disabilities. The 10 services were classified as very necessary for the majority of those surveyed, emphasizing on services: 3 - *Evaluation in real job scenarios (ecological evaluation)*, 4 - *Evaluation to determine pre-employment needs*, and 9 - *Supported Employment* as the services with the most support for being most in need (90%, 91% and 84%, respectively). Regarding the frequency of the availability of services at the VRA, it is important to point out service: 3 - *Evaluation in real job scenarios (ecological evaluation)* classified as very necessary by 90% of those surveyed, which was

at the same time classified as not available by 43% of them; at the same time, service number 10 - *Extended Support* classified as very much in need by 70% of those surveyed and classified as unavailable by 23% of them.

The following information was not part of the Comprehensive Statewide Needs Assessment conducted by the University of Puerto Rico. However, it should be considered as part of the situations that affected the PRVRA during 2017 and 2018:

Puerto Rico went through difficult times during 2017 due to Hurricane María, which caused damages to PRVRA facilities estimated in \$3,144,475.39, of which \$2, 581,673.50 were damages to structures (facilities) and \$562,801.89 to equipment. The most affected offices were Caguas, Arroyo, Ponce, Jayuya, San Germán, Corozal, Toa Baja, Bayamón, and Rio Piedras Evaluation and Adjustment Center. The Agency received the following assistance to reduce some of that financial burden: \$500,000.00 from Private Insurance, and \$102,230.23 from the US Federal Emergency Management Administration (FEMA).

The effects of the hurricane caused that from September 18 to 26, 2017, public employees, in our case Vocational Rehabilitation Counselors and other staff, did not report to work, which implied that important operational dates could not be carried out, as were the checks issuance, eligibility determinations, plans development, among others. However, a work plan was developed to prioritize the provision of VR services.

Regarding the effects on the service delivery, as soon as the Government restored its operations, the PRVRA made the necessary coordination to continue offering direct (in person to applicants/consumers) and indirect (data entry and transactions in mechanized system) services provided by the Vocational Rehabilitation Counselors. However, the Agency experienced some challenges because many facilities were impacted and due to the instability of the electrical system after the hurricane. The personnel were relocated, so that the services would not be significantly affected or interrupted. This includes the services provided by the VR Counselors, personnel and service providers of the Assessment and Adjustment Centers and Units, and Support and Employment Modes Centers' staff. At this moment all PRVRA Regions are providing the services at the maximum capacity.

(B) who are minorities;

In Puerto Rico, 99.03% of the population is of Latino-Hispanic origin. Therefore, the ARV considers that there is no need to establish a procedure to identify persons with disabilities belonging to minority groups.

(C) who have been unserved or underserved by the VR program;

The VRA staff that participated in the survey was asked with respect to sectors or groups that could be receiving services or are underserved when compared to the expected levels. The three (3) identified groups by all sectors surveyed included persons with include people with hearing impairments (including deaf-blind), Autism Spectrum Disorder and people with most significant disabilities. An additional group was the students with disabilities not eligible for Special Education services (Section 504).

(D) who have been served through other components of the statewide workforce development system; and

For this section, focal group opinions from PRDOLHR, municipalities and DE staff operating under WIOA were used: Title I Programs - Youth, Adults and Dislocated Workers, Title II Programs - Adult Education, Title III Programs - Wagner-Peyser (WP), and Title IV - Vocational Rehabilitation Administration (VRA) Programs. After analyzing Focal Group Number One's remarks, we may conclude that its participants concur regarding Title II and III services under WIOA (2014) as being underutilized by the DE, because hardly any cases are being referred from the agency, and those that do arrive, are mainly self-referred. Their comments come together about the lack of independent living skills and pre-employment skills in youth applying to Title II, III, and IV programs services who were DE students. Besides, independent living and pre-employment skills, it is important that the DE develop skills for placement. Title I, II and III staff require people with disabilities management training and specialized staff in these areas because they depend on VRA's Rehabilitation Counselors.

(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

The service needs among students with disabilities was analyzed by four (4) groups or professional categories, be it: TA, CAA General and DE. The more important results of such analysis are as follows:

- a. Comparative analysis by Professional Group of the needs of students with disabilities receiving special education services - The service identified as the major need by these professional groups was Career Exploration Counseling. It stands out from services that include practical experience for students (be it work-based learning experiences with on-site visits or *job shadowing*, or direct job experience - *trial work experiences*) constituted their top priority need. This fact becomes more important when observing that according to the opinion of all the professional groups, the identified services are either not offered or offered in limited occasions. Of the four (4) compared groups (TA, CAA, GEN

and DE), three (3) presented a trend, moderate coincidence, or strong opinions when aligning their priorities or pre-employment transition services needs for students with disabilities receiving special education from the DE. The groups that significantly correlated between themselves are CAA, GEN and DE, correlating between moderate-high and high. The TA group presented low and non-significant correlation indexes when compared to the other three groups, a finding that could be expected when considering that the roles of this professional allow a very particular understanding and identification of needs.

- b. Comparative analysis by Professional Group, of pre-employment transition service needs for youth ages between 14 to 21, that could be receiving special education services or under Section 504 (ADA) - Analyzing the opinion of these professionals, when it comes to the needs of pre-employment transition services for these students, one may conclude that every professional group coincided by stating that their principal needs lie in the evaluation of assistive technology services, therapeutic services evaluation, occupational exploration, the timeliness of the service, and the vocational evaluation. These results increase in importance when you observe that according to the opinion of the professional groups, the identified services are not offered or offered in limited occasions. Exception to this is that the DE staff understands that the assistive technology services evaluation and the therapeutic services are being offered regularly at the DE. When comparing groups, one may observe correlating indexes between moderate highs and moderate lows not statistically significant for 5 of the 6 comparisons made. This data suggests that, even though the professionals in the groups coincided in identifying major service needs, they did not show high congruency when priorities were placed in order of need with regard to the previously identified transition services.

The service needs were also analyzed according to the Region of the ARV in which the professional works. In this analysis, DE professionals were not included. The main results were as follows:

- a. Comparative analysis, per VRA Region, of the needs of students with disabilities receiving special education services - One observes that services 1, 4, 7, 8, 10 and 17 have the highest average, and were selected by the majority of the groups, or by the majority of the professionals regarding them as the services mostly in need. Among these are 1 (78%), 7 (65%), and 10 (67%) as the highest numbers, suggesting that the professional groups stated that these were the services mostly needed: *1- Career Exploration Counseling in schools including information about on demand*

careers and industry sectors; 7 - Work-based learning experiences with on-site visits to the job-place in order to find out the required skills per occupation; and 10-Job experiences to explore student-interest areas that will include occupational practice and short-term employment (seasonal, summer). The same as in analysis by professional groups', the comparison by region allows us to identify that *Career Exploration Counseling* was identified as of the most need by all participating professionals in every regions. Services that include practical experience for students (be it work-based learning experiences with on-site visits or *job shadowing*, or direct job experience for interest exploration - *trial work experiences*) constitute the highest needs. These results must be analyzed taking into consideration that according to the opinion of the professional groups of all regions, the identified services are not offered or offered in limited occasions. It is observed from the correlational analysis that there was a high congruence and consistency among the professionals of the regions when assign priority or hierarchy to the previously identified needs as more pressing.

- b. Comparative analysis per VRA region, of pre-employment transition-service needs for youth between the ages of 14 to 21, that could be receiving special education services or under Section 504 - Results observed were that services number 1 (80%) , 2 (72%), 11 (75%), and 12 (68%) has the high average percentiles selected by all or the majority of professional groups and labeled as the needed services. The aforesaid suggests that the majority of the professional groups surveyed, per VRA region, selected the following needs as those mostly in need: 1-*Assistive Technology Needs Evaluation (AT)*; 2-*Therapeutic Service Needs Evaluation (physical therapy, occupational therapy, and psychological therapy)*, 11-*Receive timely therapeutic services*, and 12-*Vocational Evaluation*. The evaluation to determine *Assistive Technology* needs received firm endorsement from all regions, suggesting that the service is needed in all of Puerto Rico. Similarly, the previously mentioned services were recognized as of high need for evaluation, and on time delivery of therapeutic services and vocational evaluations. The same as in previous analysis, major needs are not offered or offered in limited occasions. In synthesis, there was congruency in identifying which were the priority needs, but not in a relative order of adjudication in the majority of regions.
- c. Comparative analysis per VRA region, of pre-employment transition services needs that could be observed among students with disabilities receiving services from accredited post-secondary programs (private schools, technological institutes, universities, among others): The professionals in the 6 regions coincided in identifying services 5 (64%), 10 (67%), 12 (56%), and 16 (63%) as those with the

highest percentiles, suggesting that in their opinion these are the services most in need. The services are: 1- *Academic tutoring*; 5-*Classroom accommodations or modifications*; 10- *Student career exploration for those with very low academic achievement*; 12- *Affective counseling for transition and adjustment process (self-advocacy skills, empowerment)*; and 16-*Academic counseling (studying techniques, academic planning)*. *Counseling in career-exploration services for students with low academic achievement, accommodations or modification in the classroom and academic counseling*, received the highest average percentiles. Participant opinions regarding frequency of availability varies according to the service. For example, participants reported academic tutoring as regularly available; but career-exploration counseling and affective counseling were not offered or offered in limited occasions.

- d. VRA's comparative analysis, per VRA region, regarding other vocational rehabilitation services for students and youth up to 24 years of age, and current VRA consumers - The professionals in the six (6) regions coincided in identifying services 2(69%), 4(79%), and 5(74%) as the mostly needed. These services show the highest average results and were selected by all or by the majority of the professionals in the region. The services were: 2- *Supported Employment*; 4- *Job-searching Assistance*; and 5- *Job-placement Assistance*. All three (3) services are employment focused: search, placement and supported employment mode. The professionals in all regions also coincided in pointing out that these are regularly offered services. The correlated analysis performed lets you identify the responsive trends among skills regions, the more frequently endorsed activities from participating professionals. One sees that of the 15 correlations performed, 6 had significant correlated significance: San Juan-Ponce ( $r = .899$ ;  $p < .05$ ); Bayamón-Mayaguez ( $r = .899$ ;  $p >> .05$ ); Bayamón-Ponce ( $r = .899$ ;  $p < .05$ ); Caguas-Ponce ( $r = .886$ ;  $p >> .05$ ); Caguas-Arecibo ( $r = .943$ ;  $p >> .05$ ); y Mayagüez-Ponce ( $r = .886$ ;  $p >> .05$ ). The previous correlation indexes are described high, suggesting that the professionals in these regions were consistent in assigning a relative priority or hierarchy to the identified needs. The remaining correlations were not significant, fluctuating between moderate low and moderately- high, which lets us to conclude that in the rest of the comparisons made between regions, there were no high correlations when assigning priorities.>

See also the general conclusions from the focal groups presented in item 13 of the General Conclusions at the beginning of section (j)(1)-*Results from the Statewide Needs Assessment, on Vocational Rehabilitation Services for people with disabilities in Puerto Rico*.

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

Section D of the General Group survey to professionals from the VRA was developed with the main purpose of finding out the VRA's surveyed opinions regarding the need to establish, develop or improve community rehabilitation programs. The section consisted of four (4) concrete questions aimed at differently related aspects of Community Rehabilitation Programs (CRP) that are or could be under contract by the VRA.

Based on their professional experience in the ARV and the vocational rehabilitation services needs of the ARV consumers, respondents answered the following to the first question:

1. *Do you believe that there are enough CRPs on the Island able to satisfy VRA consumers needs?*

ANSWER: Most of the participants (68%) answered NO, that there are not enough CRPs in Puerto Rico. The detailed answers given by the participants may be distributed as follows:

Yes - 29 (18%)

No - 109 (68%)

No answer - 22 (14%)

The opinion of the majority of VRA participants is that there are not enough CRPs to keep up with the supported employment services demand. According to the surveyed professionals, the limitation of CRPs negatively affects goal and indicator achievement possibilities, because the consumers have to wait for long periods of time before receiving services. The mostly affected areas seem to be the rural-mountainous regions. Regarding the services offered by the PRCs, there seemed to be a consensus to demand more specialized trained staff of the CRPs and improve the control of the ARV on the service processes that the CRPs perform. Several participants pointed out that the main challenge is not the CRPs limitations, but the lack of competitive employment on the Island. Hand-in-hand with this observation, the need for the employers to be more sensitive toward people with disabilities rights, as well as the recognition of their potential being a must.

For more information regarding findings and recommendations related to CRPs see section (j)(1)(A).

The following information was not part of the Comprehensive Statewide Needs Assessment conducted by the University of Puerto Rico, but must be consider as part of the situations that affected the CRPs during 2017 and 2018:



Community Rehabilitation Programs that provide supported employment services to PRVRA consumers were affected by Hurricane María in 2017 and experienced some challenges as many facilities were impacted. One of the CRP reported that the first floor of their facility was affected by flood and they lost everything, while other floors had damaged doors, windows, roof and equipment. Estimated damages caused by flood, wind and rain were \$1,084,000.00, and they received \$409,456.26 in assistance from a flood insurance, but haven't receive assistance from FEMA neither compensation for rain and wind damages insurance. However, this CRP indicates that their staff did not stop providing services to consumers, after the impact of Hurricane Maria, as consumers and their families needed assistance and support, and that facilities were ready to offer services from October 16, 2017. Another CRP reported \$15,000.00 in estimated damages caused by flood and another \$6,000 in damages to equipment and miscellaneous. They received \$3,000.00 from the flood insurance.

Some employers went out of business and the consumers lost their jobs, while others reduced operation hour. Another issue that impacted CRP's performance goals was the migration of consumers to the US caused by the loss of properties, electric power, water and in some cases, their relatives.

Despite all these things, later on new jobs opportunities emerged in other industries like construction, steel, and small business. Some of our consumers with the most significant disabilities were able to do this kind of jobs while others don't, which is something the PRVRA and CRPs will continue to work on.

- (3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

All of the surveyed sectors coincide in pointing out the need to improve, or develop from the beginning, interagency coordination procedures as a pre-requisite for pre-employment transition services to be achieved according to the statutes of law. It is inferred the need for services and procedures to be more uniform throughout the regions, including active participation from consumers and also from their family.

The limited interagency coordination negatively affects and dilutes the services and procedures of eligibility for the VRA, maintaining inequality in the services rendered, by region and per school, creating lack of information to be given to future consumers, their families and education staff.

For more details regarding needs see section (j)(1)(E)-*Vocational Rehabilitation needs, among youth and students with disabilities including, as applicable, the need for pre-employment transition services, among other transition services.*

## (G) ANNUAL ESTIMATES

Describe:

(1) The number of individuals in the State who are eligible for services;

The PRVRA has estimated that 57,000 individuals with disabilities will be eligible to receive services, during FYs 2019 and 2020. The purpose is to assist them in achieving an employment outcome and a more independent living. The PRVRA is not under an Order of Selection.

The following section provides a description of the service areas and the breakdown of projected costs for FY 2019:

**Table 71. Service Areas and The Breakdown of Projected Costs**

<b>Service Area</b>	<b>Funds (\$)</b>	<b>Title I or VI-B</b>	<b>Estimated Customers to be served</b>	<b>Average Cost of Services (\$)</b>
Assessment (Purchased services)	0	I	2036	0
Physical and Mental Restoration	241,350.74	I	15,199	15.88
Training	9,819,481.02	I	18,294	536.76
Maintenance	3,973,004.30	I	5,733	57.75
Transportation	3,400,287.83	I	4,501	62.95
Personal assistance (personal aides)	451,265.86	I	642	702.91
Assistive Technology	785,799.27	I	682	1,152.20
Post-employment	5,045.62	I	49	102.97
Small businesses, other	257,207.09	I	264	974.27
Supported Employment services	2,434,096.00	I	867	2,807.49

Community Rehabilitation Programs contracting	300,000	VI-B	0	0
Total	21,367.537.73*	I/VI-B	48,267**	6,413

\* Amounts are based on figures approved in the budget for FY 2017 and RSA-2 Federal Report. \*\* Consumers who receive duplicate variety of services depending on the nature of it. (Ex. A consumer may receive training support services, transportation, personal care, etc., and also be getting assistive technology services among others. Therefore, the estimated number of consumers to be served without duplicating is 50,000.

(2) The number of eligible individuals who will receive services under:

(A) The VR Program;

Please, refer to previous section.

(B) The Supported Employment Program; and

Please, refer to section k.1.A.

(C) each priority category, if under an order of selection;

Not applicable.

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Not applicable.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

Please, refer to section K.1.A. above. Order of selection not applicable.

## (L) STATE GOALS AND PRIORITIES

The designated State unit must:

(1) Identify if the goals and priorities were jointly developed. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Please, refer to section L.2., below.

(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

The PRVRA, in partnership and collaboration with the State Rehabilitation Council (SRC), has identified the following goals and priorities needed to carry out the vocational rehabilitation and supported employment programs.

### **Goal 1**

Strengthen the services provision process of applicants/consumers of the PRVRA; emphasizing on compliance with performance indicators and productivity measures established by the federal government and the public policy of the agency.

Priorities:

1. Continue to provide services to applicants/consumers, and technical assistance to counseling services staff for the compliance and data collection of the new performance indicators established by WIOA.
2. Collaborate with the “core-programs” in order to develop integrated processes for the service delivery; and forms and processes for collection of common data elements to identify individuals served by more than one “core-program”.

### **Goal 2**

Ensure the provision of services to eligible youth with disabilities, and pre-employment transition services to students with disabilities coming from transition, so that they can achieve an employment outcome.

Priorities:

1. Maintain the level of participation of school staff, parents and students with disabilities on orientations related to VRA services, including Transition and Pre-Employment Transition services.

### **Goal 3**

Strengthen the relationship with employers to identify opportunities for competitive integrated employment, situational assessments and career exploration.

Priorities:

1. Expand competitive integrated employment opportunities for people with disabilities.

### **Goal 4**

Maintain the process of dissemination of the PRVRA services in accordance with the eligibility criteria and provision of rehabilitation services to the persons with disabilities.

Priorities:

1. Continue to disseminate the impact on changes in legislation and how VRA services and the integration of core programs under WIOA can help people with disabilities to achieve an employment outcome.

**Goal 5**

Strengthen the administrative, fiscal and programmatic procedures to comply with the regulations established and the institutional efficiency required.

Priorities:

1. Continue with the analysis of the operational performance and needs for its improvement.

These goals and priorities were developed taking into account the findings from the *Comprehensive Statewide Needs Assessment of Rehabilitation Needs* and the Amendments set forth in WIOA, among others.

- (3) Ensure that the goals and priorities are based on an analysis of the following areas:

Please, refer to sections J and L.2. above.

- (A) The most recent comprehensive statewide assessment, including any updates;

Please, refer to sections J and L.2. above.

- (B) the State's performance under the performance accountability measures of section 116 of WIOA; and

Please refer to sections I. 2. Goal 1, above.

- (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

Goals and priorities were developed in collaboration with the SRC. The SRC also collaborated with PRVRA in the Statewide Needs Assessment, which provided information on areas to improve operation and effectiveness. The PRVRA also participates in the SRC's meetings where input is received directly and was considered to develop goals and priorities. SRC recommendations are included at the beginning of this VR Portions of the State Plan.

## (M) ORDER OF SELECTION

Describe:

- (1) Whether the designated State unit will implement and order of selection. If so, describe:
  - (A) The order to be followed in selecting eligible individuals to be provided VR services.

Not applicable.
  - (B) The justification for the order.

Not applicable.
  - (C) The service and outcome goals.

Not applicable.
  - (D) The time within which these goals may be achieved for individuals in each priority category within the order.

Not applicable.
  - (E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and  
Not applicable.
- (2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

Not applicable.

## (N) GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

- (1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

The PRVRA has developed the following goals and plans for the distribution of Title VI, Part B funds:

**Goal A:**

Serve at least 200 new consumers in the 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:**

Use other sources of funding, in addition to the ones from Title VI, Part B, needed to expand the provision of supported employment services.

- 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.
- Strengthen the provision of supported employment services through training and technical assistance to the staff of the CRPs. The Office of Support and Employment Modes (OSEM) and the centers of support and employment modes (CSEMs) 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 CSEMs, 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.
- Explore in the community, in agencies, in the state legislature and in social interest groups; the availability of gathering funds to the PRVRA for the provision of supported employment services.

**Distribution of Title VI, Part B funds:**

The estimated total of projected funds for the provision of supported employment services for is \$3,308,900 distributed as follows: \$300,000 from Title VI-B for the contracting of a CRP; and \$3,008,900 from Title I for the contracting of other CRPs and for expenses related to the supported employment services.

(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

(A) the provision of extended services for a period not to exceed 4 years;  
and

The PRVRA will make available resources for extended services for a period not exceeding 4 years. These services will be provided through contracting of CRPs. CSEM 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.

(B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

The PRVRA will explore in the community, agencies, organizations, legislature and social interest groups, the availability of funds to the PRVRA for the provision of supported employment and extended services for the youth with the most significant disabilities. As part of those efforts, in 2016 the Agency signed a collaborative agreement with the State Council on Developmental Disabilities for the optimization of interagency resources, develop a community support network in favor of individuals with the most significant disabilities, including youth, employment activities to promote inclusion of these population into integrated work settings, activities or projects to provide extended services, among others.

## (O) STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

The ARV has identified several strategies necessary to achieve the goals and priorities established in section (L), above.

### **Goal 1:**

Strengthen the process of providing services to ARV applicants / consumers; emphasizing compliance with performance indicators and productivity measures established by the federal government and the public policy of the agency.

### **Strategies:**

- Strengthen coordination with the DTRH to know employment trends and types of employers.



- Continue implementing employment projects through the development of self-employment.
- Continue with programmatic monitoring and technical assistance to PRCs to guarantee quality and agility of services to consumers with the most significant impediments.
- Coordinate ARV consumer participation in employment-related activities available at the American Job Centers and other WIOA components.
- Continue with the referral of consumers who are beneficiaries of Social Security Disability Insurance (SSDI) to the Caribbean Program of Work Incentive Planning and Assistance (CWIPA) for the Service of Planning Counseling of Benefits
- Share with the CER the normative communications that govern the provision of services.
- Continue with the programmatic monitoring of the service delivery process to ensure compliance with public policy.
- Continue to provide technical assistance to supervisory services for counseling services to improve decision-making in case management.
- Refer ARV consumers to the services of other WIOA components (Literacy, Adults and other programs) to expand their employment skills.

**Goal 2:**

Ensure the provision of services to young people with eligible disabilities, and pre-employment transition services to students with disabilities from Transition, to obtain an employment result.

**Strategies:**

- Continue with the monthly monitoring of the eligibility determinations in 60 days or less and the planning and signing of the PIPE in 90 days or less, of the youth referred to transition to the ARV.
- Maintain the participation of the CRV in the COMPU meetings of the transitional youth.
- Offer Pre-Employment Transition services.
- Continue with the identification of the transition consumers referred and served in the CAA.
- Continue with the identification of the transition consumers referred and served in the CAME and the results of these young people in the different employment modalities

- Strengthen the relationships between the DE and the ARV to facilitate the identification of students who can benefit from Transition services.
- Continue to guide school personnel on the services of the ARV.

**Goal 3:**

Strengthen the relationship with employers to identify opportunities for integrated competitive employment and career exploration.

**Strategies:**

- Provide training and technical assistance to employers on ADA requirements, work-based learning experiences, recruitment of people with qualified disabilities, accommodation in employment, among others
- Continue to grant salary incentives to employers to promote employment opportunities for consumers.
- Continue to participate in meetings of the State Board and Local Boards of WIOA
- Maintain the active participation of ARV personnel in activities that bring employers together.
- Refer to programs under Wagner-Peyser to ARV consumers who possess skills and credentials to be marketed with employers.

**Goal 4:**

Maintain the process of dissemination of ARV services, emphasizing the criteria of eligibility and provision of rehabilitation services to persons with disabilities.

**Strategies:**

- Continue the dissemination on the revision of the State Plan to be submitted for public comments in order to guarantee the participation of applicants / consumers, the general public and employees of the agency.
- Continue participation in outreach activities in the community, by the ARV and / or in coordination with CERPR and other basic programs under WIOA.
- Continue with the dissemination of ARV services in the "American Job Centers".
- Continue with the dissemination of services in radio, television and written press programs, as requested by said media.

**Goal 5:**

Strengthen administrative, fiscal and programmatic procedures so that they comply with the established regulations and required institutional efficiency.

### Strategies:

- Offer training to staff, to strengthen knowledge and skills necessary in the performance of their duties.
- Continue to carry out periodic evaluations of the performance of the agency's employees to ensure institutional effectiveness.
- Maintain the level of financing of the State Council for Independent Living (CEVI) and the State Council for Rehabilitation (CER), to assist and support its operations; and in coordination with the ARV to develop employment and independent living opportunities for our applicants/consumers.
- Update administrative, fiscal and programmatic procedures in accordance with established state and federal regulations, and the socio-economic situation of the country, as necessary.
- Continue to support all areas of the agency in the use of available computer systems, and develop applications to streamline processes, reports and procedures according to needs presented by the areas and which in turn will be consulted with the services and administration staff.
- Hold participation meetings with agency staff on aspects related to public policy.
- Carry out monitoring to ensure compliance with the procedures.

(1) The methods that will be used to expand and improve services for individuals with disabilities.

See discussion of strategies in previous section, under goals 1, 3 and 4.

(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The ARV has the purpose of providing technology assistance services to eligible applicants/consumers who require such services. For these purposes, the ARV has the following:

- Procedures, Regulations and Manuals for the provision of technological assistance services;
- Vocational Rehabilitation Counselors who refer applicants / consumers to the CAA for: assessment of technological assistance needs, recommendation and prescription of equipment, delivery and training in the use of the equipment, and technical assistance;

- Parent Technology Assistance Unit at the San Juan Region Assessment and Adjustment Center;
- Technology Assistance Areas in the Arecibo, Ponce, Toa Baja, Caguas and San Germán Assessment and Adjustment Centers;
- Technology assistance team that meets the following needs:
  - Computer access;
  - Communication;
  - Alternate help for cognitive deficit;
  - Independent life;
  - Environmental controls;
  - Visual; and
  - Audio logical Clinic (Regions of Arecibo, Caguas and San Juan) with updated equipment of technological assistance for independent living and facilitating the communication of deaf and partially deaf consumers.
- Specialized professionals and certified in technological assistance that provide these services; and
- Professional development opportunities to keep up to date the knowledge of human resources that provide technological assistance services.

In addition, the ARV established a collaborative agreement with the Technological Assistance Program of Puerto Rico (PRATPR) to offer training to the agency's employees on new technologies and equipment. The ARV may refer consumers for technology assistance services that are not available at the agency.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

In terms of the outreach procedures to identify and serve people with disabilities who are minority, such procedures do not apply to Puerto Rico. The Island is considered a Hispanic or Latino country, with a population of 3,337,177 (Source: U.S. Census Bureau, Census Estimate for 2017). Out of this total, 99.03% is of Hispanic or Latino origin. Therefore, the PRVRA considers that there is no need to implement any type of procedure to identify persons with disabilities who are minority.

The PRVRA has community liaison units, attached to the centers of VR counseling services (CVRCS), operating in the six (6) regions of the agency. These units have a staff that maintains contact with various referral sources such as: schools, hospitals, institutions specialized in the provision of services to the population with disabilities, and public/private agencies. Such staff participates in activities (orientations on VR services,

job fairs, among others) for the purpose of expanding the dissemination of information on services and increasing the inclusion of persons with the most significant disabilities.

The Agency also remains active and participates in the bills that are developed in the legislature, related to people with disabilities.

- (4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

Please, see strategies under Goal 2 section O.

- (5) If applicable, plans to establish, develop and improve community rehabilitation programs in the jurisdiction.

The ARV annually issues a public notice for the hiring of PRCs that provide services to consumers with the most significant impediments. Currently the ARV maintains contractual agreements with PRC throughout the island. The ARV conducts guidance, technical assistance and monitoring activities at all stages of service provision, and during the contractual period between the ARV and each PRC. Technical assistance will be provided to all PRCs that have areas identified with some type of need for improvement during any stage of the monitoring process.

- (6) Strategies to improve the performance of the jurisdiction under the indicators established by section 116 of WIOA.

The ARV continues to implement the following strategies to improve the functioning of the State with respect to evaluation standards and performance indicators:

- a. to Continue the practice of periodically sharing statistical information with regional staff.
- b. Articulate intervention plans with regional directors, directors of Vocational Rehabilitation Counseling Services Centers; Assessment and Adjustment; Support and Employment Modalities; and the directors of the Office of Rehabilitation Counseling Services and the Office of Quality Control and Program Management, to meet established goals. Priority attention will be given to regions that have faced the most difficulty in achieving goals and indicators. The regions will develop a work plan based on an analysis of each work zone, the employment situation in the geographical area and projections of cases to be served.

- c. The case management system has been modified to record the follow-up of post-program exit cases. The monitoring screens include fields to cover employment and salary indicators under section 116 of WIOA. In addition, a report was developed that allows users to generate a list of consumers who left the program after receiving services and the dates on which the second and fourth quarter follow-up corresponds. The staff has been provided with information on the importance of carrying out such monitoring and compiling the data of the indicators.
- d. Emphasis will be placed on the importance of service to employers, including guidance and training to raise awareness about the benefits of recruiting and retaining people with disabilities, and technical assistance after placement.
- e. The ARV contacted the staff of the Department of Labor and Human Resources to coordinate the receipt of the Unemployment Insurance information to validate the information of the second and fourth quarter employment indicators under WIOA.
- f. The Agency will refer consumers to other mandatory programs under WIOA and will continue to promote post-secondary education among its consumers. Many of the ARV consumers are receiving training.

(7) Strategies to assist other components of the workforce development system that provide services to individuals with disabilities.

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

- a. Coordinate the participation of ARV staff in the American Job Centers (AJC), to properly channel the needs of those with disabilities who request information and/or services in such centers.
- b. Identify possible referrals to the services of the ARV.
- c. Provide the AJC staff with guidance on various topics of interest that are requested related to people with disabilities.
- d. Actively participate in job fairs coordinated by the AJC.
- e. Exchange of employment networks / employers.

The previously established strategies will allow the achievement of the goals in section (L).

(8) How the strategies will be used to:

- (A) achieve the goals and priorities of the jurisdiction, consistent with the comprehensive needs assessment;

All of the PRVRA strategies were developed based on the Comprehensive Needs Assessment Study and WIOA amendments in order to reach the goals and priorities established by the State..

(B) support innovation and expansion of activities; and

The ARV will continue to identify innovation and expansion needs. Some strategies are:

1. Expansion of the provision of services to people with disabilities due to traffic accidents, through a collaboration agreement with the Automobile Accident Compensation Administration.
2. Expansion of the availability of information resources or training for new recruitment staff through the agency's internal page (intranet).
3. Continued with the use of remote interpretation video technology for deaf people.
4. Continued funding from CERPR and CEVI to assist and support their operations, as well as jointly develop with the ARV, better employment and independent living opportunities for our applicants / consumers.

(C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

The PRVRA has available and accessible services to all individuals with disabilities. In order to promote the participation in VR and SE services, the agency staff participates in community orientation activities. There are no differences in terms of availability of services for particular disabilities, cultural or racial groups. Also, the PRVRA performs the necessary steps to continue to ensure that our facilities are accessible to all individuals with disabilities.

(P) EVALUATION AND PROGRESS REPORTS: VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT GOALS.

Describe:

- (1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:
  - (A) Identify the strategies that contributed to the achievement of the goals.

**Goal 1:**

Strengthen the process of providing services to ARV applicants / consumers; emphasizing compliance with performance indicators and productivity measures established by the federal government and the public policy of the agency.

**Strategy:**

Strengthen coordination with the DTRH to know employment trends and types of employers.

**Progress Report:**

During the 2017 and 2018 programs, the staff of the Support Centers and Employment Modalities (CAME) developed / participated in 80 activities in coordination with the Department of Labor and Human Resources (DTRH), which facilitated knowing the new employment trends and the types of employer. On the other hand, they continued to receive various publications and / or journals from the DTRH Research and Statistics Division, some of these were: Business Employment Dynamics, Industrial Composition by Municipality (published quarterly); Covered Jobs and Wages. These publications and / or magazines allow CAME staff to continue developing workshops for consumers.

The Office of Support and Employment Modalities (OAME) received approximately 60 job offers from various types of employers by email. Once received, he referred them to the CAME to be analyzed and identify potential consumers who could benefit from employment alternatives.

The Office of Rehabilitation Counseling Services (OSCRV) referred 182 job offers to OAME.

**Strategy:**

Continue implementing employment projects through the development of self-employment.

**Progress Report:**

CAME offered 1,148 workshops on job search and summary preparation, among others. They also offered 706 technical guidance and / or assistance to consumers for the development and evaluation of proposals. The Regional Committee for the Evaluation of Self-Employment Proposals conducted 48 evaluations of the Business Plan presented by consumers with the goal of self-employment.

**Strategy:**

Continue with programmatic monitoring and technical assistance to Community Rehabilitation Programs (PRC) to guarantee quality and agility of services to consumers with the most significant impediments.



**Progress Report:**

OAME conducted 11 monitoring of the PRCs during the 2017 program year, with a compliance result of over 90% in 45% of them.

Similarly, OAME carried out 11 monitoring during the 2019 program year. The results of these are as follows:

**Table 72. OAME Monitoring PY 2019**

<b>PRC</b>	<b>Date Monitoring</b>	<b>Percent Compliance</b>
National Association of the Blind (CRECES)	July 18, 2019	66
Training Center People with Disabilities (CAPI)	July 17, 2019	73
Centro Nuevos Horizontes	July 16, 2019	100
College of Special Education and Integral Rehabilitation (CODERI)	July 15, 2019	100
Prevocational Institute (IPVI)	July 17, 2019	70
Independent Life Reach Movement (MAVI)	July 19, 2019	73
Puerto Rico Down Syndrome	July 17, 2019	63
Empleo Alianza	July 15, 2019	13
The Corporate Source	July 15, 2019	71
Program for Assistance for Educational and Social Rehabilitation (PARES INC.)	July 16, 2019	83

The Office of Quality Control and Program Management (OCCGP) developed the Survey of Training Needs of PRC staff that provides services to ARV consumers, which was sent to the PRCs by the State Rehabilitation Council (CER). Based on the results of the needs survey, the OCCGP collaborated with the CER in identifying resources that offered training on May 10, 2019 to 57 professionals, among which: PRC employees; CAME's staff and CER councilors.

**Strategy:**

Coordinate ARV consumer participation in employment-related activities available at the American Job Centers and other WIOA components.

Progress Report:

The American Job Centers (AJC) referred approximately 248 cases to the ARV. The CAME's offered 219 orientations in the AJC. The Rehabilitation Counseling Service Centers (CSCRV) offered 288 orientations in the AJCs and 584 participants benefited.

The ARV developed the 2017-04 Normative Communication "Role of the Vocational Rehabilitation Administration (ARV) in the American Job Centers and the ARV Referral Form to the AJCs.

**Strategy:**

Continue with the referral of consumers who are beneficiaries of Social Security Disability Insurance (SSDI) to the Caribbean Program of Work Incentive Planning and Assistance (CWIPA) for the Service of Planning Counseling of Benefits

Progress Report:

During the 2017 and 2018 program years, 21 Counseling authorizations for Benefit Planning were certified as 'service provided'; and 30 are in process (they have not been certified as a service provided). This, for a total of 51 authorizations generated in the periods.

**Strategy:**

Share with the CER the normative communications that govern the provision of services.

Progress Report:

The ARV shared with CER a total of 13 Normative Communications that had been provided to the counseling staff.

**Strategy:**

Continue with the programmatic monitoring of the service delivery process to ensure compliance with public policy.

Progress Report:

The OSCRV conducted internal monitoring to evaluate the process of providing services, recommendations for self-employment services and occupational equipment; analysis of: cases closed in the applicant stage, eligibility determinations in 60 days or less and development of the service plan in 90 days or less, the amount of expired plans was also

evaluated, and purchases of assistive technological equipment to guarantee services offered to the consumers of the ARV; achieving:

- ✓ 107 internal monitoring of the service delivery process with 180 monitored files;
- ✓ 12 internal monitoring of recommendations for self-employment services and occupational equipment with 23 files monitored;
- ✓ 1 internal monitoring of cases closed in the applicant's stage with 21 files monitored;
- ✓ 1 internal monitoring of the service request process (60-day analysis) with 151 files monitored;
- ✓ 1 internal monitoring of the eligibility determination process with 3 monitored files;
- ✓ 1 internal monitoring on the development process and signing of the Individualized Plan for Employment in 90 days with 151 files monitored;
- ✓ 1 internal monitoring for analysis of plans versus expired plans with 151 files monitored;
- ✓ 312 corrective actions with the objective of guaranteeing services offered to ARV consumers; and
- ✓ 1 internal monitoring on the process of buying technological assistive equipment with 4 files monitored.

The CSCRV carried out internal monitoring of service files of the applicants / consumers to evaluate the process of providing services, achieving:

- ✓ 239 internal monitoring of the eligibility determination process with 483 records monitored;
- ✓ 323 internal monitoring of the development of the Individualized Employment Plan with 597 files monitored;
- ✓ 247 internal monitoring of the transition process with 966 files monitored;
- ✓ 3,271 internal monitoring of the budget management process with 6,858 records monitored;
- ✓ 861 internal monitoring of the stabilization process, transition to extended support and closure with 1,079 monitored files;
- ✓ 198 internal monitoring of the process of closing rehabilitated cases with 342 files monitored;
- ✓ 101 internal monitoring of the referral process with 190 monitored files;

- ✓ 26 internal monitoring of cases closed in the applicants stage with 86 files monitored;
- ✓ 335 internal monitoring of the training process with 484 files monitored;
- ✓ 172 internal monitoring of cases with more than 10 years with 174 files monitored; and
- ✓ 584 internal monitoring of the case discussion process with 1,173 files monitored.

The OCCGP carried out 243 monitoring of electronic files. In these, compliance with the following aspects was evaluated: eligibility determinations in 60 days or less, development of the Service Plan in 90 days or less, and registration of Credentials obtained before the closing of the file. The results of the process are shared with the Regional Directors, Counselors Directors and Supervisors

**Strategy:**

Continue to provide technical assistance to supervisory services for counseling services to improve decision-making in case management.

Progress Report:

The OSCRV carried out the following activities:

- ✓ 4,119 technical assistances through the user help desk of the mechanized service delivery system called: Customer Rehabilitation Information System or CRIS;
- ✓ 7, 014 technical assistance to: Vocational Rehabilitation Counselors (CRV), supervisory services supervision staff; CSCRV directors and Regional Directors, to improve decision-making in case management, compliance with evaluation standards and performance indicators and increase the level of compliance of the CRVs that achieve the established goals; and
- ✓ 312 corrective actions with the objective of guaranteeing services offered to the ARV consumers.

Refer ARV consumers to the services of other WIOA components (Literacy, Adults and other programs) to expand their employment skills.

Progress Report:

The ARV referred to the Programs under the WIOA Titles a total of 275 consumers. CAME maintained contact with AJC Ponce to identify new proposals in the WIOA Adult and

Youth Program in: January, February, March April, May and June 2019; managing to impact 10 people.

**Goal 2:**

Ensure the provision of services to youth with eligible disabilities, and pre-employment transition services to students with disabilities from Transition, so that they obtain an employment result.

**Strategy:**

Continue with the monthly monitoring of eligibility determinations in 60 days or less and the planning and signing of the PIPE in 90 days or less, of the youth referred to transition to the ARV.

Progress Report:

The OCCGP monitored compliance with these measurement criteria, achieving:

- during the 2017 program year; 93% in the eligibility determinations of the cases referred by the schools were carried out in 60 days or less; and 90% of the plans were developed in 90 days or less.
- during the 2018 program year; 93% in the eligibility determinations of the cases referred by the schools were carried out in 60 days or less; and 95% of the plans were developed in 90 days or less.

Strategy:

Maintain the participation of the CRV in the COMPU meetings of the transitional youth.

Progress Report:

Rehabilitation Counseling Analysts (ACR):

- ✓ They reported 5,799 young people with Transition impediments to the CRV.
- ✓ They achieved a total of 2,094 participations at COMPU meetings.
- ✓ The CRV achieved a total of 277 participations to COMPU meetings

**Strategy:**

Offer Pre-Employment Transition services.

Progress Report:

The ARV coordinated the offering of services and mandatory activities as part of the Pre-Employment Transition (Pre-ETS) services, achieving:

The OAA carried out the following activities:

- ✓ Completed performance evaluation of 56 transition students who participated in the Work Based Learning Experience in August 2017.
- ✓ Revised Collaboration Agreement between the ARV, Department of Labor and Human Resources and the Department of Education (DE) to provide pre-employment services to ED students with disabilities who meet the criteria for receiving Pre-ETS services as established by the WIOA Law.
- ✓ Formalized the Project to Offer Vocational Evaluation Services through a Mobile Unit as an innovative alternative, for which it carried out the following activities:
  - Require approval of the Rehabilitation Services Administration (RSA).
  - Require approval from the Office of Management and Budget.
  - Participated in a meeting at the General Services Administration (ASG) to clarify doubts and require guidance on the pre-auction procedure and formal auction.
  - Prepared and submitted to the director of the Purchasing Division of the ARV a detailed and descriptive report of the components of the mobile bus; This responded to a request from the ASG for the pre-auction.
  - Participated in the formal auction held on April 30, 2019.
- ✓ 1,200 students benefited from pre-employment transition activities coordinated by the Assessment and Adjustment Centers / Assessment and Adjustment Units.

The ARV planned and coordinated the offer of mandatory activities through service fairs and workshops to students in the process of transition from the ED between the ages of 14 to 21, including those receiving special education services or under section 504 of the Rehabilitation Law achieving:

- ✓ Work Based Learning Experience Activity (July 2017).
  - 2,475 young people with disabilities participated in the experience
  - Services Fair and closing of the work-based learning experience (1 / August / 2017)
  - 69 employers lent their facilities so that transition students had a real work experience.
- ✓ November / 2017 - Hiring of five (5) service providers, achieving:

- 4,937 students benefited from pre-employment transition activities coordinated by service providers through service fairs.
- ✓ January / 2019 - Hiring of twelve (12) service providers, achieving:
  - That 3, 656 students benefited from pre-employment transition activities coordinated by the entities through service fairs.
- ✓ Evaluation of Proposals of entities interested in providing workshops / trainings / orientations to students in the transition process of public schools and colleges between the ages of 14 and 21, including those receiving special education services or under section 504 of the Law of Rehabilitation. The following activities were carried out:
  - Public Notice in press
  - P Proposal Evaluation Committee was instituted
  - Proposal Evaluation
  - Establishment of contractual conditions for service provision
- ✓ Managed the signing of Executive Order No.: 2019-05 (March 18/2019), which encourages and promotes students with disabilities who receive special education services or under section 504; receive pre-employment transition services by participating in Work-Based Learning Experiences (WBLE), in the agencies and instrumentalities of the Government of Puerto Rico.
- ✓ 97 contracts formalized with agencies and instrumentalities of the Government of Puerto Rico that participated in the Work-Based Learning Experience (June and July 2019).
- ✓ 2,829 young people with disabilities participated in the work-based learning experience.

**Strategy:**

Continue with the identification of the transition consumers referred and served in the CAA.

Progress Report:

The Centers / Units of Assessment and Adjustment (CAA / UAA) received 2,229 referrals of cases at transition ages and offered a total of 2,074 services.

**Strategy:**

Continue with the identification of the transition consumers referred and served in the CAME and the results of these young people in the different employment modalities.

Progress Report:

388 Transition consumers were referred to the Support Centers and Employment Modalities (CAME). 175 Transition consumers with employment results (St. 26) were served in CAME in the following modalities:

- ✓ Regular Employment: 96
- ✓ Sustained Employment: 75
- ✓ Self-management: 4

**Strategy:**

Strengthen the relationships between the DE and the ARV to facilitate the identification of students who can benefit from Transition services.

Progress Report:

The ARV participated in 20 meetings with the Special Education Advisory Committee.

Strategy:

- Continue to guide school personnel on the services of the ARV.

Progress Report:

19,612 guidance were offered on the transition process to:

- ✓ Parents: 7,746
- ✓ Teachers: 2,744
- ✓ Students: 9,122

**Goal 3**

Strengthen the relationship with employers to identify opportunities for integrated competitive employment and career exploration.

**Strategy:**

Provide training and technical assistance to employers on ADA requirements, work-based learning experiences, recruitment of people with qualified disabilities, accommodations in employment, among others.

Progress Report:



OAME carried out the following activities:

- ✓ It offered guidance to the PRC TIPCO on Auto intercessory, this in coordination with Support Analyst and Employment Modalities, in May 2018.
- ✓ Provided technical assistance to the PRC CODERI related to WIOA requirements (new services related to extended services).
- ✓ Established contact with the Industry for the Blind Company in North Carolina for the recruitment of blind people; it also shared the information with the Rehabilitation Counselors. Subsequently, It contacted executives of the company located in Mayagüez, PR in order to explore available employment opportunities and the viability of recruiting people with disabilities.
- ✓ It participated in a monthly "call conference" with the Puerto Rico Federal Buildings-GSA including the New York region to monitor potential stores for commercial facilities.
- ✓ It offered technical assistance to six employers who have recruited ARV consumers in order to guarantee their permanence in employment.
- ✓ Participated in a meeting with the president of the Ponce Employers Committee (May 2019).
- ✓ Participated in a meeting of the Carolina Board of Trustees, in which the president and employers were present (June 2019).
- ✓ It directed the Public Affairs Manager of Walmart Puerto Rico regarding the recruitment of people with disabilities and explored the feasibility of coordinating work-based learning experience opportunities in June 2019.

CAMEs carried out the following activities:

- ✓ They offered approximately 1,393 orientations to potential employers.
- ✓ They offered approximately 540 orientations by telephone communication to potential employers.
- ✓ They sent approximately 315 electronic communications to potential existing employers.
- ✓ They offered approximately 1,684 face-to-face technical assistance, telephone and electronic communication, impacting approximately 999 people.

**Strategy:**

Continue to grant salary incentives to employers to promote employment opportunities for consumers.

Progress Report:

- ✓ The ARV formalized 4 salary incentive contracts, benefiting 7 consumers.

Strategy:

Continue to participate in meetings of the State Board and Local Boards of WIOA.

Progress Report:

- ✓ ARV staff participated in 43 meetings of state and local boards.
- ✓ The ARV attends monthly, or as convened at meetings scheduled by the different public and private agencies with a view to joining efforts aimed at providing services to people with disabilities, such as: Employers Committee; Proposal Review Committee; Monitoring Committee; Committee for Persons with Disabilities; American Job Centers, among others.

**Strategy:**

Maintain the active participation of ARV personnel in activities that bring employers together.

Progress Report:

The ARV participated in approximately 57 job fairs and other activities in the community. Some of the activities were the following:

- ✓ Educational and Occupational Fair called: You are the Protagonist of your Success Story, in March 2018 and 154 people were impacted.
- ✓ Job fair called: Meeting, Innovation and Job Opportunities, Passport to Work, in March 2018 and 180 people were impacted.
- ✓ Economic Development Forum: The Cooperative Model, a solution to boost the Economic Development of the Southwest Area (Information Board), in August 2018 and 22 people were impacted.
- ✓ Employment Fair of the Government of Puerto Rico (El Capitolio de PR) in August 2018, approximately 28 employers participated, and 5 consumers benefited.
- ✓ Participation in educational activity with the North Board of Trustees. The theme was: Sexual harassment in the workplace, in August 2018; Approximately 25 employers benefited.

- ✓ Tu Cámara Emprende (Information Board), in September 2018 and 20 people were impacted.
- ✓ Orientation: How should we work with deaf people (Information Board), in September 2018 and 50 people were impacted.
- ✓ Participation in: Self-Employment and Entrepreneurship Event for Young People with Disabilities, in September 2018 and 57 people were impacted.
- ✓ Employers Workshop: "Fit in or Set Out", in October 2018 and 36 people were impacted.
- ✓ Meeting with President Committee of Employers at the University of Turabo in October 2018, 1 person was impacted.
- ✓ Employers Committee Meeting at the University of Turabo (6 / October / 2018), 3 employers participated, and 2 representatives of the ARV (director of CAME and Analyst).
- ✓ Employment Fair of the Municipal Alliance of Integrated Services, in October 2018; 5 service agencies participated and 4 consumers benefited.
- ✓ Transition to the World of Work fair at the University of Turabo in October 2018, 15 employers participated and 5 consumers benefited.
- ✓ Employment Fair for the Tourism-Hotel Industry at the Puerto Rico Convention Center in October 2018, 4 consumers benefited.
- ✓ Employer Workshop Collaboration: Recent Changes Labor Licenses, in November 2018 and 30 people were impacted.
- ✓ Job fair in the Arecibo Region in December / 2018
- ✓ Conference to employers: The key concepts in sound and hearing loss in December / 2018 and 12 employers benefited.
- ✓ Job fair at Pueblo Supermarket Offices in January 2019, 3 consumers benefited.
- ✓ Participation with the Ponce Employers Committee / WIOA Employment Service during a visit to Hogar San Miguel in January 2019, and 20 people were impacted.
- ✓ Job fair of the Jobs for You agency in Caguas, in January 2019, 5 people were impacted.
- ✓ Job fair produced by Brenda Marrero and Associates in February 2019, 5 consumers benefited.
- ✓ Job fair in Sizzler, Ponce in February 2019, 10 consumers benefited.

- ✓ Job fair at La Esperanza School in February / 2019, and 23 people were impacted.
- ✓ Workshop: Ergonomics and Technological Assistance with Ponce Employers Committee/WIOA Employment Service in February 2019, and 31 people were impacted.
- ✓ Presentation of ARV-CAME Talent Bank to Zimmer in April 2019, and 2 people were impacted.
- ✓ Job fair in Villa Parguera, Lajas in April 2019 and 40 people were impacted.
- ✓ Participation with the Coamo Employers Committee in Educational Seminar in April 2019 and 12 people were impacted.
- ✓ Restaurant Industry Recruitment Fair in May 2019, approximately 20 employers participated, and 145 people were impacted.
- ✓ Camera in your Community at the Aguadilla Mall in May 2019, 6 people were impacted.
- ✓ Orientation: Care of the Golden Age, at the Direidi Nursing Home in May 2019, and 28 people were impacted.

**Strategy:**

Refer to programs under Wagner-Peyser ARV consumers who possess skills and credentials to be marketed with employers.

Progress Report:

- ✓ The ARV referred 146 consumers to the programs under Wagner Peyser.

**Goal 4**

Maintain the process of dissemination of ARV services, emphasizing the criteria of eligibility and provision of rehabilitation services to persons with disabilities.

**Strategy:**

Continue the dissemination on the revision of the State Plan to be submitted for public comments in order to guarantee the participation of applicants / consumers, the general public and employees of the agency.

Progress Report:

The OCCGP carried out the following activities:

- ✓ In March 2018, it directed the members of the State Rehabilitation Council on the official plans of the agency, including the Unified State Plan and the Strategic Plan;

and provided them with technical assistance for the development of their recommendations.

- ✓ In April 2018, it held a meeting with the management staff of the ARV program offices to review the Goals, Priorities and Strategies of the State Plan.
- ✓ In June 2018, 26 directors of: Central Level, Regional, Rehabilitation Counseling Service Centers, Assessment and Adjustment Centers, and Employment Support and Modalities Centers were directed to the official plans of the agency, including the State Plan Unified and the Strategic Plan.
- ✓ It Completed the revision of the Portion of Vocational Rehabilitation Services 2018-2020 of the Unified State Plan 2016-2020; complied with submitting this to the Department of Economic Development and Commerce (PRDEDC) for the applicable publication process.
- ✓ In October 2018, it wrote a Public Notice notifying the availability of the draft of the ARV portion of the Unified State Plan for consumer comments and the general public to this document. At the same time, he urged in the Public Notice that any comments to another section of the Unified State Plan be addressed to the PRDEDC (electronic address indicated). The Public Notice was sent to the six regional offices and was placed in each of the waiting rooms; in turn it was placed on the bulletin boards of the offices / divisions / areas of the Central Level. On the other hand, the PRDEDC publishes a Press Notice about the availability of the Unified State Plan and its availability for comments.

Personnel from the administrator's office participated in 2 meetings related to the Unified State Plan in the PRDEDC and in the Department of Labor and Human Resources on July 17, 2018.

**Strategy:**

Continue participation in outreach activities in the community, by the ARV and / or in coordination with CERPR and other basic programs under WIOA.

**Progress Report:**

The OSCRV offered 21 guidelines on the services offered by the ARV benefiting 799 people, which are detailed below:

- ✓ Services Fair on August 1, 2017; 650 people impacted;
- ✓ Deafblind Advisory Committee of Puerto Rico on August 24/2017, with the participation of 10 people;

- ✓ RYAN Program (Ryan White Law of 1990) on October 31, 2017, with the participation of one (1) person;
- ✓ Department of Correction; on November 1, 2017, with the participation of one (1) person;
- ✓ Labor Development Board on December 19, 2017;
- ✓ Labor Development Board on January 29/2018, with the participation of one (1) person;
- ✓ Medical Center Trauma Hospital on February 20, 2018, with the participation of one (1) person; Specialized School on 6 / March / 2018, with the participation of one (1) person;
- ✓ Committee for People with Disabilities-Local Area Board Labor Development Guaynabo / Toa Baja on March 8, 2018;
- ✓ Movement for the Reach of Independent Living on April 18/2018, with the participation of one (1) person;
- ✓ Department of Justice on July 13, 2018, with the participation of eight (8) people. The orientation was provided by OSCRV and OAA staff;
- ✓ Goodwill Grays LLC agency dedicated to job search and development of occupational skills on July 26, 2018, with the participation of 14 people;
- ✓ Program of the Blind and People with Mental and Developmental Physical Disabilities Industry (CIRIO) on 6 / September / 2018, with the participation of five (5) people;
- ✓ Mech-Tech College of Caguas on 6 / September / 2018, with the participation of 30 people;
- ✓ Colegio San Ignacio de Loyola on September 24, 2018, with the participation of eight (8) people;
- ✓ Puerto Rico Department of Public Security on October 19, 2018, with the participation of 19 people;
- ✓ State Council for Independent Living on February 14/2019, with the participation of 25 people;
- ✓ Patient Procurator on April 25/2019, with the participation of three (3) people;
- ✓ Associate Secretary of Special Education on May 1, 2019, with the participation of 10 people;

- ✓ Department of Housing on June 4, 2019, with the participation of 10 people;
- ✓ University of the Sacred Heart on May 29, 2019, by telephone. Orientation was offered to one (1) person about the service of scorers and readers.

The OCCGP carried out the following activities:

- ✓ Developed the Survey of Training Needs of the personnel of the PRC Community Rehabilitation Programs that provide services to ARV consumers; which was sent to the PRCs by CER.
- ✓ Collaborated with the CER in the identification of resources that offered training on May 10, 2019 to 57 professionals among which participated: PRC employees; CAME's staff and CER councilors and this based on the results of the needs survey. In this activity, the availability of the satisfaction survey for consumers and employers was reported.
- ✓ It collaborated in the review of the surveys administered to consumers and employers, published on the CER website on March 14, 2019.

The OAA carried out the following activities:

- ✓ It offered guidance to 16 employees of the Municipality of Manatí related to the services offered in the Centers and Units of Assessment and Adjustment.
- ✓ Provided guidance on ARV services to the administrative staff of Mech-Tech College on September 14, 2018, with the participation of 22 people.
- ✓ Provided guidance through one (1) interpreter of the agency's signs, in the Student Services Division of the University of Puerto Rico on March 1, 2019, benefiting 47 teaching and non-teaching professionals.
- ✓ Provided guidance on the provision of services in the CAA / UAA to professionals and students of Occupational Therapy at Huertas College on May 3, 2019, benefiting 13 professionals.

OAME carried out the following activities:

- ✓ Coordinated and participated in a meeting with staff of the Federal Department of Labor (Division of Standards and Wages) discussed aspects established in WIOA for employers and provided guidance on the services of the ARV.
- ✓ Participated in several meetings with the State Council of Developmental Deficiencies (27/February/2019; 27/March/2019; 9, 17 and 25 /April/2019).

- ✓ Provided guidance on ARV services and served as liaison with other agencies on May 15, 2019.

CAME participated / developed in various activities, some of these were the following:

- ✓ Mayaguez / Las Marias Labor Development Area Services Fair (August 2017), nine (9) people were impacted.
- ✓ Chamber Services Fair in your Community (August 2017), 32 people were impacted.
- ✓ Stop & Go Services Fair / Office of the First Lady / Fortaleza (November 2017), 96 people were impacted.
- ✓ Aguada Convention Center Services Fair (December 2017), 95 people were impacted.
- ✓ Service Fair at the Bobby Cruz de Hormigueros Convention Center (April 2018), 280 people were impacted.
- ✓ Services Fair: Government Services Summit (May 2018), 99 people were impacted.
- ✓ Member of the Mentoring Committee of the Libera Incubator of the MATRIA Caguas Project (August 2018), eight (8) people were impacted.
- ✓ It offered guidance on Law 51 and Sustained Employment at Juan Cancio Ortiz School (October 2018), impacting 19 students.
- ✓ Interagency Meeting at the Humacao Judicial Center (October 2018, and April 2019), 13 agencies participated.
- ✓ Consolidated Cigar Corporation Services Fair (October 2018), approximately 100 employees were impacted.
- ✓ Workshop: How much power do I have to be successful, in December 2018, impacting 14 consumers.
- ✓ Participation in Cross Training of Mandatory Partners of the Carolina Labor Development Board, in November 2018, impacting 48 people.
- ✓ Workshop: Preparation for job interview (February / 26/2019) at the Julia de Burgos Protected House, 16 people were impacted.
- ✓ Orientation at Bristol Myers Squibb Factory, in March and April 2019, impacting 22 people.
- ✓ Orientation at Aspen Factory, in April 2019, impacting approximately 15 people.



- ✓ Services Fair on April 9, 2019, 155 people were impacted.
- ✓ Participation in Innovative Conversation towards Northwest Business and Labor Development, on May 1, 2019, 17 people were impacted.
- ✓ Services Fair on May 21, 2019, 114 people were impacted.

**Strategy:**

Continue with the dissemination of ARV services in the "American Job Centers" (AJC).

Progress Report:

The CAME offered 219 orientations in the AJC. The CSCRVs offered 288 orientations in the AJC.

CAME offered talks / workshops / orientations to participants and / or employees of the AJC; some of these activities are as follows:

- ✓ Workshop: Preparation of resume and job application (July 2018; January 2019 and February 2019)
- ✓ Workshop: Frustration Management (July 2018) } Workshop: Job interview (July 2018)
- ✓ Workshop: Developing our personal appearance (July and August 2018 / April and May 2019)
- ✓ Workshop: Effective communication and interpersonal relationships in employment (July, August and September 2018 / February, April, May and June 2019)
- ✓ Workshop: Strengthening our self-esteem (July, August and September 2018; March 2019, May and June 2019)
- ✓ Workshop: Fundamental actions in employment / Attitude management (August 2018)
- ✓ Workshop: Decision making in employment (September 2018)
- ✓ Workshop: Work culture incursion (September 2018 / March and April 2019)
- ✓ Workshop: Critical management (September 2018) } Guidance on ARV / CAME services to staff of:
  - AJC Ponce (August 2018), impacting 10 people
  - AJC Coamo (November 2018), impacting two (2) people
  - AJC Mayagüez (December 2018 / June 2019), impacting 37 people

- AJC Arecibo (October to December 2018 / May and June 2019), impacting five (5) people
- AJC Manatí / Dorado (October to December 2018 / May and June 2019), impacting seven (7) people
- ✓ Guidance on ARV/CAME services to AJC participants of:
  - AJC San Juan (October and November 2018), impacting 13 people
  - AJC Mayagüez (November and December 2018), impacting 24 people
  - AJC Ponce (January 2019), impacting 16 people
  - AJC Mayagüez (February 2019), impacting 10 people
  - AJC Mayagüez (March 2019), impacting 10 people
  - AJC Manatí / Dorado (February and June 2019), impacting two (2) people
- ✓ Guidance on the services of the self-management modality (September 2018), impacting 17 people.
- ✓ Presentation of CAME Talent Bank and identification of job offers at AJC Ponce (November 2018 / January, February, March, April, May and June 2019), impacting 19 people.
- ✓ Workshop: What to do to keep our job? (January 2019)
- ✓ Workshop: Important areas in the job interview (January, February, March, April, May and June 2019)
- ✓ Workshop: Strengthen areas of need in a job (February and April 2019)
- ✓ Workshop: Misuse of social networks (April 2019)
- ✓ Workshop: Decision making (June 2019)

**Strategy:**

Continue with the dissemination of services in radio, television and press programs, as requested by said media.

Progress Report:

The ARV participated in the following outreach activities:

Table 73. ARV Outreach Activities

Date	Name of station (radio/TV)	Topic
3/13/2018	WIPR 940 (radio interview)	Conversation about the Week and Day of the Rehabilitation Counseling Professional
4/17/2018	Press release Review by News Forum	Delivery of applications to participate in the Work-Based Learning Experience
5/7/2018	Press release Review by La Fortaleza	Increase in benefit for applicants and consumers of agency benefits
6/11/2018	Press Release Review by: La Fortaleza, and Ponce News	Work Based Learning Experience
8/10/2018	Website review of: Notiuno, and Al Aire Victoria 840	Completion and closure of the Work-Based Learning Experience
9/25/2018	Press Release Review by La Fortaleza	Payment to youth who participated in the Work-Based Learning Experience
12/18/2018	Press Release Review by: First Time, WIPR	Signing of Agreement between the ARV and the Department of Education of PR
12/18/2018	Press Release Review by: First Time, WIPR	Signing of Agreement between the ARV and the Department of Education
1/14/2019	Press Release Review by WIPR	Extension of the application period to participate in the Work-Based Learning experience
2/20/2019	Press release	Start of Services Trade Shows
3/4/2019	Press Release Review by Primera Hora	Signing of Collaborative Agreement between the ARV and the Department of the Family so that students with disabilities who receive services from the ARV participate in the Work-Based Learning Experience program

Date	Name of station (radio/TV)	Topic
3/19/2019	Channel 4: WAPA TV	Conversation about the Week and Day of the Professional of the Ministry of Rehabilitation and Promotion of the Services of the ARV
3/19/2019	Channel 6: The WAPA TV	Promotion of the ARV Services
4/2/2019	Press Release	Young people with Autism Spectrum Disorder work as ARV employees for a day
5/13/2019	Press Release Review by: WIPR	Interagency effort in favor of the deaf population in Puerto Rico
5/30/2019	Press Release Review by: WIPR	Increasing the number of students with disabilities requesting employment opportunities through the ARV
6/27/2019	Press Release Review by: WIPR	They train interpreters for the deaf on meteorological terminology

### Goal 5

Strengthen administrative, fiscal and programmatic procedures so that they comply with the established regulations and required institutional efficiency.

#### Strategy:

Offer training to staff, to strengthen knowledge and skills necessary in the performance of their duties.

Progress Report:

The OSCRV carried out the following activities:

- ✓ Guided Transition Analysts in the six regions of the ARV on pre-employment transition services, benefiting 12 professionals (January 15, 2019).
- ✓ Reinforced the process of providing services and meeting goals to the agency's counseling staff, benefiting 24 professionals (January 18, 2019); personnel from the six regions of the agency participated (Regional Directors, directors of the: Counseling Services Centers, Assessment and Adjustment Centers and Support Centers and Employment Modalities).

- ✓ Provided guidance on the Impact of the WIOA Law to central and regional level management staff, benefiting 12 professionals (March 18, 2019).
- ✓ Through the Workforce Innovation Technical Assistance Center (WINTAC), counseling personnel from the six regions of the agency were trained, benefiting 475 professionals (March 19-20, 2019).
- ✓ In collaboration with the OAA, it offered guidance on the implications of WIOA in the process of providing services to Toa Baja CAA staff on June 6, 2019, including: CRV, CAA Analyst, Teachers, Vocational Evaluators and Occupational Therapist.

The CSCRVs represented by the supervisory staff coordinate administrative meetings, offer mentoring, discuss normative communications and reinforce issues related to the provision of services. OAME carried out the following activities:

- ✓ Held a conversation with CRV of the Caguas Region on January 30, 2019.
- ✓ They directed the directors of the Support Centers and Employment Modalities and Regional Directors related to the Job Club initiative and the results of the first experience on February 11, 2019.

CAME carried out the following activities:

- ✓ 457 CSCRV staff orientations
- ✓ 19 guidance to CAA staff
- ✓ 1,891 technical assistances to CSCRV staff;
- ✓ 47 technical assistances to CAA staff
- ✓ 56 guidance to CRV on labor market trends and occupations with higher demand

The OCCGP carried out the following activities:

- ✓ Provided face-to-face and telephone technical assistance to Rehabilitation Counselors and / or Counseling Supervisors. The theme was: How to correctly complete the fields of information to PIPE and record comparable benefits. Six (6) sessions (one (1) per region).
- ✓ Technical assistance to Regional and Counseling Directors on productivity goals / indicators (via email and telephone).
- ✓ Guidance on State and Strategic Plan to 26 employees (June 27, 2018), among which there were 20 rehabilitation counselors who hold management positions.

- ✓ Training for 211 employees in the counseling area of the six regions of the agency (November and December 2018), among which were: Rehabilitation Counselors (CR), Counseling Supervisors (SC), Directors of Counseling Service Centers (DCSCR), and Counseling Services Technicians (TSC). The training theme was: How to Complete the WIOA Follow Up Screens (post-exit monitoring) and Information on Productivity Indicators.
- ✓ Collaborated with the State Rehabilitation Council in the identification of resources that offered training on May 10, 2019 to 57 professionals among which participated: ARV CAME staff, CER councilors, and employees of the Rehabilitation Programs The Community is based on the results of the needs survey.

The OAA carried out the following activities:

- ✓ 4 trainings and / or workshops and / or orientation to professionals of the Assessment and Adjustment Centers (Occupational Therapists and / or Occupational Therapy Assistants; Vocational Evaluators and Counselors in Vocational Rehabilitation) and others (to professionals in the process of completing Certification in Vocational Evaluation) to 41 employees. They were:
  - Pre-Employment Skills for Students in the Process of Transition to Adult Life and the Importance of Occupational match from the Perspective of the Counselor in Vocational Rehabilitation in the Planning of Occupational Goals to 15 employees (15 / September/2017).
  - Work samples of the VALPAR System for 18 employees and 8 external professionals (August 30 and 31 and September 1, 2017).
- ✓ Guidance on Regulatory Communications: 2018- 02 Procedure for the use of test work experiences (ETP), 2018- 03 and 2018- 05 Collaboration Agreement / Referral Form for Pre-Employment Transition Services (PRE ETS ) to Students with Disabilities Referred by the Puerto Rico Department of Education (DEPR) to the Vocational Rehabilitation Administration (ARV) to 70 employees (December 1, 2017; March 1 and 8, 2018), among which were Directors Regional, Directors of the Assessment and Adjustment Centers, Directors of the Vocational Rehabilitation Counseling Service Centers, Assessment and Adjustment Analysts, Vocational Evaluators, Supervisor of the Assessment and Adjustment Center.
- ✓ Guidance to CRV on the services offered at the Assessment and Adjustment Centers (CAA) in the areas of Occupational Therapy and Speech and Language Pathology to 20 employees (February 20, 2018).

- ✓ Coordinated and offered guidance on the Occupational Demand Occupations in the Labor Market to 23 Vocational Assessors (March 8, 2018) with staff from the Department of Labor and Human Resources.
- ✓ Training Vocational Evaluators on Psychometric Properties in the Vocational Evaluation Tests to 23 employees (6 / April / 2018 and 4 / May / 2018), among which there were Vocational Evaluators and a CAA director.
- ✓ Training for Occupational Therapists about the COMPASS Functional Assessment Software (AM) Technological Assistance Program and Discussion of report formats for occupational therapy services to standardize them (Wheelchair Evaluation, Technology Assistance Evaluation) (PM) to 19 employees (20 / April / 2018).
- ✓ Training for Vocational Evaluators on the Theory, Administration and Interpretation of the Test of Vocational Interests and Computerized Self-Efficiency Cirrena Gerena Computerized to 17 employees. It was held at the Test Innovation Company in San Juan (May 11, 2018).
- ✓ Training on the Importance of Occupational match From the Perspective of Rehabilitation Counselor in the Planning of Occupational Goals. Pre-Employment Skills and Transition Process to Adult Life to 22 employees (May / 23/2018) among which were Workstation Professionals, Areas of Functional Academic Skills and Pre-Employment.
- ✓ Guidance to 29 professionals in the counseling area of the San Juan Region regarding those referred to the Assessment and Adjustment Centers (CAA), the purpose, the indicators and how to write the question of that referral, according to the services requested to 28 CRV and the Regional Director, on September 21, 2018.
- ✓ 1 training on the vocational evaluation process on October 25, 2018 to one (1) teacher relocated to the CAA of San Juan.
- ✓ Provided guidance to professionals in the area of counseling regarding compliance with the Interagency Agreement for services offered to injured workers between the ARV and the State Insurance Fund Corporation, benefiting 45 professionals (7.13, and December 20, 2018).
- ✓ 1 training for CAA / UAA professionals. The theme was: Characteristics and functioning of the person with autism / Intervention strategies for the process of evaluation and development of skills on 2 / May / 2019, benefiting 51 professionals.
- ✓ 3 training and professional training in the area of vocational evaluation to be located in the CAA of Caguas from 3 to 5 / June / 2019, benefiting 1 professional.

- ✓ 1 training and training related to the APTICOM test to a professional transferred to the Vocational Evaluation area on June 17, 2019.
- ✓ 1 sign language guidance on the terminology used when reporting natural phenomena on June 26, 2019. They joined in this effort, the Bureau of Emergency Management, the ARV and the National Meteorological Service, benefited 4 interpreters to signs of the agency.
- ✓ Collaborated in the coordination of the Second Vocational Evaluation Symposium: Change Strategies, held on 10 / October / 2018 at the Central University of Bayamón, benefiting 21 professionals among whom were CAA / UAA personnel: Vocational Evaluators, Analysts and directors; and director of OAME.
- ✓ Through the Workforce Innovation Technical Assistance Center, CAA / UAA personnel were trained on March 19-20, 2019, benefiting 36 professionals.

#### The Budget Division:

- ✓ Provided individual guidance as required to senior management at the regional level related to Use and Management of Funds. } Trained two (2) employees in the area of budget analysis.
- ✓ Coordinated training with the Department of the Treasury on the PRIFAS System (January 9 and 23/2019)

#### The Office of Labor Affairs and Human Resources (OALRH):

- ✓ Trained 225 employees in the counseling area, distributed as follows:
  - 151 counselors in Rehabilitation
  - 74 support staff
- ✓ Coordinated 160 training activities for ARV personnel reaching 2,039 participations. Some of the topics were:
  - Disaster preparedness
  - New trends and challenges in human resources management
  - Second symposium of vocational evaluation ⌘ Quick response in suicidal behavior situations
  - Inclusion and integration in society
  - Social evolution conflict management



- Assertiveness and resilience in times of change
- Technological assistance in communication
- ✓ Directed the agency's management personnel in relation to Memorandum No. 11 - 2018 of the Office of Administration and Transformation of Human Resources of the Government of Puerto Rico, related to the update of the Employee Duties Sheet (May 2018).

**Strategy:**

Continue to carry out periodic evaluations of the performance of the agency's employees to ensure institutional effectiveness.

Progress Report:

Through electronic communication (December / 2017 and February / 2018), OALRH guided all supervisory personnel, directors and senior advisors at the island level, in relation to amendments made to the form called the Performance Evaluation and Development System. 90 ARV management employees benefited from the orientation. In turn, 713 employees were evaluated during the period.

**Strategy:**

Maintain the level of financing of the State Council for Independent Living (CEVI) and the State Council for Rehabilitation (CER), to assist and support its operations; and in coordination with the ARV to develop employment and independent living opportunities for our applicants/consumers.

Progress Report:

- ✓ The ARV provided an allocation of funds to both councils during the 2017 and 2018 program year. In addition, it maintains agency representation and collaboration on both councils.

**Strategy:**

Update administrative, fiscal and programmatic procedures in accordance with established state and federal regulations, and the socio-economic situation of the country, as necessary.

Progress Report:

- ✓ During the 2017 and 2018 programs the agency developed official communications for this purpose. Some of the aspects were: Procedure to refer applicants / consumers of the Vocational Rehabilitation Administration with auditory conditions for the acquisition of the Caption Call telephone; Manual of

Vocational Evaluation Procedures; Procedure to provide extended services to young people with more significant disabilities, consumers of the vocational rehabilitation administration, placed in employment under the modality of sustained employment; Procedure for the use of test work experiences; criteria for receiving pre-employment transition services; Integrated Competitive Employment; Procedure to recommend commercial enterprise by means of the Randolph-Sheppard Law; Procedure for coding pre-employment transition services in the Activity Logs by Program, among others.

**Strategy:**

Continue to support all areas of the agency in the use of available computer systems, and develop applications to streamline processes, reports and procedures according to needs presented by the areas and which in turn be consulted with the services and administration staff.

Progress Report:

The Information Systems Office carried out the following activities:

- ✓ According to the electronic registry of Technical Services, a total of 1,370 services were reported and worked during the period.
- ✓ 80 services provided in the Systems Analysis and Development Division.
- ✓ They monitored the "Kronos" system to ensure the correct implementation of the changes made in the past period.
- ✓ Provided support to the OAA with the projects of: the Mobile Unit of Vocational Evaluation and Transition Services, and the Mobile Unit of Guiding Classes; evaluating the adaptability of the networks to the computer systems and operating equipment that will be used, in the unit. On the other hand, he offered support with the Hydroponic project so that the integration of the CAA ARVI system was achieved with the provision of services in the green area station in the Assessment and Adjustment Unit.
- ✓ Evaluated and recommended recruiting company that would work on issues related to the implementation of the project for the agency's New Case Management System.
- ✓ They participated in a meeting with staff of the General Services Division of the agency to elucidate aspects of the platform developed to carry out the inventory of equipment of the agency.

- ✓ They participated in 230 meetings in support of programmatic, services and administrative offices.
- ✓ At the request of the OCCGP, OSI programmers made adjustments to the case management system to comply with federal regulations.

The OCCGP carried out the analysis of the necessary adjustments to the programming of the existing case management system to comply with the federal requirements related to the RSA-911 report, referred them to the OSI, and provided the programmers and counseling staff Related technical assistance.

**Strategy:**

Hold participation meetings with agency staff on aspects related to public policy.

Progress Report:

The OSCRV carried out the following activities:

- ✓ 11 meetings with a total of 36 participations, which included directors and supervisors of the Rehabilitation Counseling Services Centers with the objective of analyzing goal compliance.
- ✓ In addition, he guided and served as a mentor for the CRV in the implementation of public policy aimed at complying with the process of providing vocational rehabilitation services according to amendments to legislation, offering 271 interventions and benefiting 329 employees.
- ✓ Coordinated and participated in teleconference with counseling services staff (counselors and supervisors) and CAA personnel (CAA Analyst and Occupational Therapist) on August 6, 2018, related to vehicle modification of the Mobile Vocational Evaluation and Services Unit.
- ✓ Schedule 1 meeting with former director of OAME to elucidate the protocol for contracting the Community Rehabilitation Programs (August 13, 2019)

In the Finance and Budget Divisions, at least once a month, face-to-face meetings were held to discuss particular compliance matters; others were given by telephone daily one or more times a day. In addition, different queries related to public policy procedures were answered daily.

The OAA carried out the following activities:

- ✓ Offered Guidance on the granting of contracts to entities for offering pre-employment transition services according to federal requirements to 20 employees (November 14, 2017).

- ✓ Guidance to directors: Regional, Rehabilitation Counseling Service Centers, Appraisal and Adjustment Centers and Units and the Employment Support and Modalities Center related to the implementation of normative communications on the criteria for receiving extended services and Test work experiences, benefiting 20 employees (December 1, 2017).
- ✓ Training of trainers or "Train the trainer" on 1 / March / 2018 with the CSCRV of the Mayagüez Region in relation to the Normative Communication 2018- 05 Collaboration Agreement / Referral Form for Pre-Employment Transition Services (PRE -ETS) to Students with Disabilities Referred by the Puerto Rico Department of Education (DEPR) to the Vocational Rehabilitation Administration (ARV).
- ✓ Guidance on the Comprehensive Action Contract to offer vocational rehabilitation services to injured workers referred by the CFSE to 148 employees, including CRVs and CSCRV directors / supervisors.
- ✓ 3 meetings with the participation of 15 professionals of the CAA / UAA with the objective of completing works of the Poster Project in Sign Language; whose purpose is to allow better communication with deaf people in the public agencies of the Government of Puerto Rico, (July 13, 18, August 9, 18, and September 13, 18). The posters were divided into three themes: Alphabet and Numbers in sign language, Basic Sign Language and Sign Language for Health Emergencies. 1,000 impressions were made of each of the 3 posters for a total of 3,000. The posters were distributed in 21 government agencies, corporations and with the general public.
- ✓ Started a project for the development of a Modular House in the Center for Assessment (CAA) and Adjustment of Toa Baja, whose purpose is: to develop independent living skills in food preparation, bedroom cleaning, laundry, among others; evaluate the skills of independent living and activities of the daily live of applicants / consumers referred to the CAA and the Units of Assessment and Adjustment (UAA); and provide adjustment services in the category of daily, family and community life to applicants / consumers referred to the CAA / UAA. To carry out this initiative, he carried out:
  - ✓ 2 meetings (April 3, 2019 and May 14, 2019) with the participation of 12 agency professionals
  - ✓ Quotation for the purchase of equipment and materials, development of the plan of the selected place, the distribution of space and work with the furniture.

OAME:

- ✓ They directed CAME directors about customized employment services and discussed the draft normative communication.
- ✓ They met with the director of the OSI and analyzed alternatives for the creation of an annotation code in CRIS "Consumer Rehabilitation Information System" related to the customized employment service, it will be included in the communication for these purposes.
- ✓ They met with director of the Purchasing Division for guidance on: the purchase of occupational equipment for small businesses and the Normative Communication Wage Incentive Formulas and Hiring and Payment Process.
- ✓ In coordination with the CAME of Arecibo and its Regional Director, the "Job Club" project was presented to the directors of CAME and Regional Directors (29 / November / 2017).
- ✓ Participated in one (1) guidance in conjunction with the directors of OAA and OSCRV related to the implementation of normative communications on the criteria for receiving extended services and test work experiences, benefiting 20 employees (December 1, 2017), among which there were directors: Regional, Rehabilitation Counseling Service Centers, the Valuation and Adjustment Centers and Units and the Employment Support and Modality Centers.
- ✓ Participated in union with directors of OSCRV and OAA in guidance on the granting of contracts to entities to offer pre-employment transition services according to federal requirement to 20 employees (November 14, 2017).

The OCCGP carried out the following activities:

- ✓ Throughout the period, he continued to analyze the way in which users of the CRIS System record the data used for federal reports and provide them with individual technical assistance. Based on this, it generated emails with group instructions to the counseling staff about the procedures for such data recording. Next, the breakdown of months and number (number) of messages sent: July 2017: 10; August 2017: 1; September 2017: 2; December 2017: 7; January 2018: 5; March 2018: 1; April 2018: 1; May 2018: 3; August 2018: 2; September 2018: 5; October 2018: 2; November 2018: 1; December 2018: 2; January 2019: 2; February 2019: 1; March 2019: 3; April 2019: 1; May 2019: 3; June 2019: 2; for an approximate total of 54.
- ✓ In November 2017 several of the messages were discussed in person or by telephone with the Rehabilitation Counselors, Directors of Counseling Centers and / or Counseling Supervisors. There were Six (6) group sessions (one (1) per region).

**Strategy:**

Carry out monitoring to ensure compliance with the procedures.

Progress Report:

The programmatic offices carried out internal monitoring during the program year (as recorded in the achievements under previous strategies), to evaluate the service delivery process. Some of these are given to both the electronic and physical files; and to non-profit organizations under contract with the ARV; among other.

(B) Describe the factors that impeded the achievement of the goals and priorities.

The economic situation of the Island affected the availability of employers to recruit, which in turn affected the amount of supported employment successful closures.

(2) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Since VR Agencies started data collection in July 2017 to measure most of WIOA section 116 performance indicators we have no previous year's performance data on those indicators.

(3) How the funds reserved for innovation and expansion (I&E) activities were utilized.

The PRVRA carried out the following I&E activities:

- a. Expansion of the provision of the services to the blind persons, through referrals for employment to the Puerto Rico for the Blind Company.
  - Progress Report: Due to the economic situation, no recruitments were made during the period.
- b. Expansion of the provision of the services to the blind persons, with intellectual deficit and other disabilities, through training and employment in the Corporation for the Blind.

Progress Report:

- During summer 2016, 10 students with most significant disabilities participated on a work-based learning experience at the Corporation for the Blind.
- c. Expansion of the availability of the training resources to the newly recruited staff (e.g. modules), through access to the internal Web page of the agency (Intranet).

Progress Report:

- During PY 2016, 11 new Normative Communications were placed on the internal web page as a reference for new and current counseling staff.
  - Also, the agency provided face to face training to 287 counseling staff related to WIOA and RSA-911 changes. Those modules and related manuals were placed on the internal web page at the beginning of the next PY.
- d. Continuation with the use of the video remote interpretation technology for the deaf persons.

Progress Report:

- The PRVRA has such technology in all its regions and is available for the deaf persons, when necessary.
- e. Continuation with the financing of the SRC and the SILC to assist and support their operations as well as to develop, together with the PRVRA, better employment opportunities and independent living for our applicants/consumers.

(Q) QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

- (1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

**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 PRVRA 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 Office of Support and Employment Modes (OSEM), at the central level of the PRVRA, intends to collaborate, provide assistance and facilitate the applicability of the public policy to the center of support and employment modes (CSEM), at the regional level, on career development services, services to employers and development of support and employment modes for the consumers. The OSEM staff contributes with other

operational/administrative offices of the PRVRA, 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 PRVRA, through its CSEMs, 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. OSEM and CSME staff also carries 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**

The supported employment services are provided for a period not to exceed twenty-four (24) months, except in special circumstances, pursuant to 34 CFR 363.6(c)(1)(iii)(A).

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 CSEMs of the PRVRA; 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 CSEM, he may receive services in the center of assessment and adjustment (CAA) of the PRVRA 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 CAA 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 Habilitation Plan

### **Stage II. Vocational Preparation/Supplementary Assessment**

- Ecological evaluation
- Possible revision of Habilitation Plan
- Continuous support

### **Stage III. Placement Services**

- Marketing Plan
- Promotion
- Occupational analysis
- Job proposal
- Reasonable accommodation
- Recruitment process
- Revision of Habilitation Plan (if it applies)
- Meetings with the employer and the family
- Continuous support

### **Stage IV. Training and Job Retention**

- Intensive and moderate training
- Development of natural support networks
- Revision of Habilitation Plan (if it applies)
- Evaluation/monitoring
- Submittal of reports
- Meetings with the employer and the family
- Continuous support

### **Stage V. Stabilization and Closure**

- 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 to youth. The PRVRA will continue to provide SE services to youth with the most significant disabilities referred from Transition. Through CRIS case management system the CSEM will identify those consumers between ages 14-24.

(2) The timing of transition to extended services.

In accordance to WIOA, the PRVRA 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 by Community Rehabilitation Programs through service authorization, with the recommendation of the centers' staff.

In order to improve the quality, the scope and the extent of the supported employment services, the PRVRA is committed to meet the goals and the strategies established and described in the Part (n) of this VR Portion of the Unified State Plan.

## VOCATIONAL REHABILITATION CERTIFICATION AND ASSURANCES

### CERTIFICATIONS

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 WIOA (Public Law 113-128) and its supplement under title VI of the Rehabilitation Act (Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014);
2. 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** (All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph) agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or

Combined State Plan (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), the Rehabilitation Act, and all applicable regulations (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), policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan (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), the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7. The **Vocational Rehabilitation Administrator** 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 **Vocational Rehabilitation 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.

## 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 of the Rehabilitation Services Administration (RSA), 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:

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.
2. **Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:** The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. **Administration of the VR services portion of the Unified or Combined State Plan:** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
  - (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
  - (b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):
    - (A) is an independent State commission.
    - (B) has established a State Rehabilitation Council**

- (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
- (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance section 101(a)(3).
- (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/**No**)
- (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/**No**)
- (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency is requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/**No**) See Section 2 of this VR services portion of the Unified or Combined State Plan.
- (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11), (24)(B), and 606(b) of the Rehabilitation Act.
- (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
- (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. **Administration of the provision of VR services:** The designated State agency, or designated State unit, as appropriate, assures that it will:
- (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
  - (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
  - (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (**Yes/No**).
  - (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 review, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act, as required by section 101(a)(14) of the Rehabilitation Act.
  - (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs
  - (j) with respect to students with disabilities, the State,
    - (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) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:
  - (a) The designated State unit assures that it will include in the VR services portion of the Unified State Plan all information required by section 606 of the Rehabilitation Act.
  - (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
  - (c) The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

#### 6. **Financial Administration**

- (a) Financial Administration of the Supported Employment Program. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.
- (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

#### 7. **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:
  - (i) 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.

- (ii) un an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.



## APPENDIX SECTION

### APPENDIX A

#### **Waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720 (b) to increase the On-the-Job Training (OJT) employer reimbursement up to 90 percent**

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 WIDA 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 251 employees or more, the statutorily defined 50% limit will continue to apply.

The waiver is requested in order to use with all WIOA formula funds: Adult, Dislocated Worker, Youth, National Dislocated Worker Grants, as well as other Discretionary grants, as appropriate. DEDC looks forward to the approval of this waiver for Puerto Rico. Effective upon approval.

#### **Statutory and/or regulatory requirements to be waived:**

WIOA Section 134(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.

#### **Actions undertaken to remove state or local barriers:**

There is no state or local statutory or regulatory barrier to implement the proposed waiver.

#### **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.

**Department of Labor's policy priorities:**

- Connect individuals with chronic unemployment or inconsistent work history with opportunities to build workplace skills and job history.
- Inject the economy with skilled individuals that will continue to advance in their specific fields or occupations.

**Individuals impacted by the waiver:**

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 order 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 option 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 more rapidly adapt to both 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.

**Process for monitoring progress in implementation:**

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.

**Process for Notice of Local Boards and Opportunity to Comment:**

The unified plan and the waiver request will be published for a period of two (2) 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.

**Waiver Impact:**

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.

## APPENDIX B

### **Waiver of WIOA section 134(d) (5) to allow up to 50 percent of Adult and Dislocated Worker funds to be used for the provision of transitional jobs.**

Waiver to the section WIOA§135(d)(5) which allows Local Boards to reserve up to 10% funds allocated to the local area involved, under section 133(b), to provide transitional jobs. Puerto Rico is proposing the DOL-ETA to allow up to 50% of Adult and Dislocated Worker funds to be used for the provision of transitional jobs.

This waiver is requested to be implemented with Adult and Dislocated Worker formula funds. DEDC looks forward to the approval of this waiver for Puerto Rico and, upon the request's approval, for the performance period to be effective immediately.

### **Statutory and/or regulatory requirements to be waived:**

PRDEDC requests a waiver of the requirement under WIOA §134(d)(5), and consistent with 20 CFR 680.190 and .195, that state that Local Boards may not use more than 10% of their combined Adult and Dislocated Worker funds to provide transitional jobs.

### **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.

### **Goals and expected programmatic outcomes of waiver:**

The waiver is consistent with the national policy to develop a workforce system that is responsive to the demands of both individuals and employer customers. DEDC anticipates the following goals will be achieved with the approval of the waiver request:

- Provide individuals with work experience and an opportunity to develop essential workplace skills within the context of an employee-employer relationship;
- Connect individuals with chronic unemployment or inconsistent work history with opportunities to build workplace skills and job history;
- Maximize the flexibility needed to ensure speedy implementation of work-based learning opportunities that WIOA for formula grants; and
- Increase business usage of the workforce system by providing incentives to hire and train new workers and thereby achieve greater access to employment opportunities for chronically unemployed.

### **Department of Labor's policy priorities:**

- Connect individuals with chronic unemployment or inconsistent work history

with opportunities to build workplace skills and job history;

- Inject the economy with skilled individuals that will continue to advance in their specific fields or occupations; and
- Create additional opportunities for new workers, and for unemployed and underemployed workers to speed their return to full-time employment.

**Individuals impacted by the waiver:**

This waiver applies to the fifteen (15) LWDA's that compose Puerto Rico's Workforce Delivery System, and that were significantly affected by the hurricane disasters. The need for training is especially acute for those participants with barriers to employment who are chronically unemployed or who have an inconsistent work history, as determined by the local boards.

**Process for monitoring progress in implementation:**

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.

**Process for Notice of Local Boards and Opportunity to Comment:**

The unified plan and the waiver request will be published for a period of two (2) 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.

**Waiver Impact:**

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.

## APPENDIX C

**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).**

**Statutory and/or regulatory requirements to be waived:**

**Indicate which part of the WIOA or the regulations the state would like to waive.**

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. The natural disasters like hurricanes, earthquakes and now pandemic like CORVID -19, are causing the loss of thousands of jobs throughout Puerto Rico. Local economists forecast that Puerto Rico will face an economic contraction that can extend for the next ten years. The island's labor market is currently paralyzed, without any new jobs or the openings of new businesses. On the other hand, Local Areas are facing an increase in the demand for jobs, for job sites that were destroyed or have not been able to restart operations because of the instability of infrastructure, lack of financial resources or the decrease in product consumption.

This situation directly impacts OSY. 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 damages 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, makes 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. ISYs have suddenly experienced 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.

**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.

**Goals and expected programmatic outcomes of waiver:**

**Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.**

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 LWDA's to develop workforce strategies that align with economic realities within their workforce area;
- Improve the ability for LWDA's 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.

**Department of Labor's policy priorities:**

**Describe how the waiver will align with the Department's policy priorities, such as:**

- 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 young people;
- 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.

**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) LWDA's that compose Puerto Rico's Workforce Delivery System, and that will be significantly impacted by an emergency. All fifteen (15) LWDA's provide services to both out of school, and in-school youth.

**Process for monitoring progress in implementation:**

The WDP of PRDEDC will monitor progress under this waiver through performance reports, and through its monitoring and performance accountability system. The Monitoring Unit will be adding the monitoring of waivers to its monitoring processes in order to ensure compliance with waiver guidelines.

**Process for Notice of Local Boards and Opportunity to Comment:**

The unified plan and the waiver request will be published for a period of two (2) 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.

**Waiver Impact:**

**Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.**

The 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*.



## APPENDIX D

**Waiver of statewide required activities described in WIOA Sections 129(b)(1)(A) and 134(a)(2)(vi) to conduct evaluations under section 116(e) of activities authorized under this chapter and chapter 3 in coordination with evaluations carried out by the Secretary under section 169(a).**

**Statutory and/or regulatory requirements to be waived:**

***Indicate which part of the WIOA or the regulations the state would like to waive.***

PRDEDC requests a waiver for statewide required activities described in WIOA Sections 129(b)(1)(A) and 134(a)(2)(vi); to conducting evaluations under section 116(e) of activities authorized under this chapter and chapter 3 in coordination with evaluations carried out by the Secretary under section 169(a). The use of this waiver is limited to emergency, disaster-related period only.

The purpose of the evaluation is to improve the management and effectiveness of workforce system programs and activities. The natural emergencies and pandemics affected and still affecting the delivery of services throughout the LWDA/AJC system across Puerto Rico. It is estimated that Puerto Rico will start to see some transitional economic changes within 10 years; the recovery process is long and unpredictable.

Gathering statistical data, participants and employer's surveys, developing an adequate methodology, disseminating the information and other necessary steps to conduct evaluations, are difficult to complete during emergency time.

**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.

**Goals and expected programmatic outcomes of waiver:**

**Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.**

- This waiver will help PRDEDC to targeting disaster recovery efforts; establish collaborative partnerships that will commit to a system-wide evaluation of activities throughout this recovery period.

- The waiver will allow Puerto Rico to develop a strategy for evaluation, transparency, to identify innovative changes and transitional steps to improve the island's workforce system.
- This waiver will also broaden opportunities for core partners to collaborate on a strategy to gather information, evaluate program requirements, as well as the state board delimit their evaluation priorities and goals.

**Department of Labor's policy priorities:**

**Describe how the waiver will align with the Department's policy priorities, such as:**

During emergency time, the PRDEDC will focus on providing LWDAs assistance to improve operational capacity, continue capacity building efforts for staff, program participants and employers, understand impact of performance outcome, and improvement and progress of the delivery of services.

**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 impact the WIOA labor development system in Puerto Rico

**Process for monitoring progress in implementation:**

The WDP will continue its efforts to improve the management and effectiveness of workforce system programs and activities. The Monitoring Unit will be adding the monitoring of waivers to its monitoring processes in order to ensure compliance with waiver guidelines.

**Process for Notice of Local Boards and Opportunity to Comment:**

The unified plan and the waiver request will be published for a period of two (2) 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.

**Waiver Impact:**

Collect and report information about waiver outcomes in the State's WIOA Annual Report. 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.

## APPENDIX E

**On January 2020, the Commonwealth of Puerto Rico requested from Employment and Training Administration, or ETA, a waiver of Workforce Innovation and Opportunity Act, or WIOA. Section 134/(a) Statewide Employment and Training Activities.**

**Statutory and/or regulatory requirements to be waived:**

***Indicate which part of the WIOA or the regulations the state would like to waive.***

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 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.

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:

- 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 687.100(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.
- 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 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.
- Supportive services may be provided to enable individuals to participate in disaster relief employment, 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 as well as appropriate adults and youth ages 18 and over.
- Transitional jobs as described at WIOA section 134(d)(5) will be supported with the WIOA statewide funds. Puerto Rico has a waiver of WIOA section 134(d)(5) to allow local boards up to 50 percent of Adult and Dislocated Worker funds to be used for the provision of transitional jobs effective until June 30, 2020.

**Actions undertaken to remove state or local barriers:**

***Describe the 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.

Puerto Rico Unified Plan modification, expected to be submitted before April 1, 2020, will contain the state and local workforce development system strategies and activities to deal with future emergency events as hurricanes, earthquake, flood, among other, including the timing, process and staff authorized to applying and administering applicable National Dislocated Worker Grants, or NDWG, consistent with WIOA Sec. 170 and its corresponding regulatory requirements. The state plan will include the state board policy as well as the process to Local Areas request NDWG funds, once the grant be approved.

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. This is a serious barrier the state wants to reduce.

**Goals and expected programmatic outcomes of waiver:**

**Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.**

**Strategic Goals**

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 as a result 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.

**Projected programmatic outcomes resulting from implementation of the waiver**

- Increase statewide and local workforce development board's response time to a qualifying event.
- This waiver will improve the ability of Local Workforce Development Boards to develop strategies to align with workforce and economic realities within their local areas after the emergency and to design programs in direct response to the needs of the affected individuals.
- Increase opportunities for needed participants to gain skills that help them to be more marketable in the labor market.
- Provide opportunity to employers to hire skilled individuals

**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.*

This waiver aligns with not only the Department of Labor’s priorities, but also with those of the State of Puerto Rico. The initiatives will demonstrate the importance of ensuring career and work readiness at all levels. 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.

**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 will help business, industries, community base organization, service providers, among other, to restart their operations, reenter employment to dislocated workers that lost their jobs by the disaster and launch the economy recovery needed in the Puerto Rico labor market. Also, will help older youth, adults and dislocated workers with employment skills.

- All eligible participants as identified at WIOA section 170 and 20 CFR 687.170
- Eligible WIOA Title I Adult, Dislocated Workers and Out-of-School Youth participants
- WIOA reportable individuals claiming under-employment or unemployment; to maintain benefit of this waiver a reportable individual must be deemed a WIOA Title I eligible participant within thirty days of accepting disaster relief employment and/or training activities
- 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.

**State plans for monitoring waiver implementation, including collection of waiver outcome information**

**States must describe how they intend to oversee effective waiver implementation and any protocols that may be used in their waiver requests.**

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 Workforce Innovation and Opportunity Act; Final Rule (i.e. 20 CFR 683) will apply.

- 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.

Additionally, the WDP will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

**Assurance of state posting of the request for public comment and notification to affected local workforce development boards**

***Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.***

Puerto Rico's waiver request was posted on DEDC's website for comment and review by required parties and the public from January 14, 2020 through January 21, 2020.

LWDBs will received the opportunity to participate in the public comment period. All received comments were evaluated and posted in DEDC's website and evaluated in case they need to be incorporated in the waiver request and the policy that is in process to be developed related this subject.

The feedback received was supporting the waiver request. In addition, they request that even this request was triggered by the recent, and still occurring, tremors that affected Puerto Rico, specially the southern area, it should be considered to have the same flexibility to serve individuals, affected by the disaster, who come to receive services in other local areas that do not, were directly affected. This requires our particular attention since there are citizens residing in the southwest area and are relocating to other areas of the island.

It should be clarified that the waiver was certainly requested in the wake of the tremors that have been affecting the island since the end of December 2019, but this flexibility should covers any other eventuality that occurs anywhere on the island and that qualify under the emergency criteria, during the extension of the waiver.

In addition, if the local area needs to provide services to people affected by a disaster who live in municipalities that are not part of that area, they should provide the services they need from the array of regular services that can be accessed in any AJC. The disaster relief and humanitarian efforts are concentrated in the local areas that have municipalities covered under the declaration of emergency.



## APPENDIX F

**Waiver of the limitation on the use of funds for capitalization of business under WIOA 181(e) to allow funds to be used to capitalize small business, up to \$5,000 per affected business.**

PRDEDC requests DOLETA a waiver of the limitation on the use of funds for capitalization of business under WIOA §181(e) to allow Governor' s Reserve funds to be used to capitalize small business that were affected by emergencies, up to \$5,000 per affected business. This waiver will allow the state to assist disaster-affected business and create new employment opportunities. Under the waiver, individuals benefiting from the capitalization must complete entrepreneurial or microenterprise training.

Puerto Rico's geographical location exposes the island to atmospheric and natural events that lead to emergencies. We are exposed to threats of floods, tropical storms and hurricanes, because of our geographical position in the Caribbean Sea, that disrupt the functioning of the island's economy after each events. In 2017, we suffered the onslaught of the Category 5 Hurricanes Irma and Maria, which left desolation, deaths, million-dollar losses, infrastructure damage and the dislocation of PR's economy. Under the grant DW-31161-17-60-A-72 assigned by DOLETA to serve both hurricanes, the business capitalization waiver was requested. Only the state of Texas had received approval from this waiver to deal with Hurricane Katrina.

On the other hand, geologically the island of Puerto Rico lies in a dynamic plate-boundary zone between two tectonic plates: the North American plate and the northeast corner of the Caribbean plate. The northern boundary of Puerto Rico is marked by the 800-kilometer-long Puerto Rico Trench, which is the deepest part of the Atlantic Ocean, with a maximum depth of 8,648 meters. Puerto Rico is bounded on the south by the Muertos Trough, on the west by the Mona Canyon, and on the east by the Virgin Islands Basin

Puerto Rico lies in a tectonically active region where earthquakes have occurred for centuries, but because Puerto Rico has not experienced a quake of this level of impact since 1918. The recent quakes occurred since December 28, 2019, their aftershocks, and resulting damage took the southwest region and destroyed it. About 7,500 people have left their homes for other kinds of shelter, including, in some cases, cars and tents.

The geologic settings of Puerto Rico created a new emergency scenario related to human safety, environmental health, and economic development. Because the island lies on an active plate boundary, earthquakes are a constant threat, and the densely

populated coastal areas are vulnerable to tsunamis. Erosion is a concern in many coastal areas, but is particularly serious to island economies that rely heavily on the tourist industry.

The latest worldwide emergency is the COVID-19 pandemic. Coronavirus disease (COVID-19) is a new strain that was discovered in 2019 and has not been previously identified in humans. This new virus and disease were unknown before the outbreak began in Wuhan, China, in December 2019.

In the three emergency scenarios that faced PR in the last years, the small and medium business are the most affected sector in the economy, because there are directly related with people spending trend.

The use of funds that will be allocated under this waiver is limited to emergency, disaster-related needs only. For example, businesses may use the funds to purchase a computer for contacting customers and reestablishing payroll records, lease a building for operations, buy supplies and materials, or for fees and tuition payments for operating licenses or staff certification and training.

Small and medium-sized established businesses represented 81.3% of private sector jobs, according to the Small Business Administration<sup>2</sup>. According to the SBA, the private sector accounted for 681,058 jobs in Puerto Rico. Of these, 555,945 or 81.3% were in businesses of 25 employees or less. It was estimated around 40,000 small and medium-sized business in Puerto Rico well known as PYMEs (the Spanish acronym for *Pequeñas y Medianas Empresas*). According to the SBA, 8 of 10 jobs openings in Puerto Rico came from PYMEs.

On June 12, 2018, DOLETA approved this waiver to Puerto Rico, until June 30, 2020, to allow the use of Irma and Maria Hurricanes NDWG funds up to \$5,000 to capitalize a small business in concert with entrepreneurial training for the individuals benefiting from the capitalization.

PR is proposing two scenarios for the use of funds for capitalization. In the first option, the state would use up to 20% of the Governor's Reserve funds, when a state emergency occurs, as proclaimed by the Governor, through the State Emergency Management Agency. In this case, the State Board will determine the allocation and approve the use of capitalization funds, taking into consideration the impact of the designated emergency. On the second scenario, up to 25% of the emergency funds allocated through an NDWG grant can be used for capitalization of small business. This alternative is in consonance with the waiver approved after Hurricanes Irma and Maria.

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<sup>2</sup> The SBA defines small business those that generate \$5 million in revenue a year or have less than 25 employees.

The following conditions apply to the use of funds for small business capitalization once approved this new waiver request:

1. The DEDC create an ad-hoc Business Capitalization Committee. The applications must be reviewed by the committee prior to approval to ensure rigor and consistency in the handling of business capitalization requests.
2. Grant assistance must be limited to no more than \$5,000 per individual/business.
3. Use of funds to cover salaries is not permitted.
4. Use of funds for business capitalization revolving loans is not permitted.
5. Is required to submit as minimum three receipt of legitimate estimates for expenses in the application for the Committee evaluation.
6. Also business have to submit receipts after the item/service is provided, to ensure that the actual cost of the good/service is not less than the estimate.
7. The business has to reimbursement the fund doesn't used as approved by the Committee.
8. DEDC financial systems in place to track funds approved under this business capitalization waiver, as well as the responsibility to recapture funds that were not used by eligible businesses in instances where the final receipt is less than the original estimate.
9. The DEDC Monitoring Unit is required to monitor the implementation of this waiver.

The waiver for capitalization after hurricanes Irma and Maria was of great help to small and medium-sized business affected by hurricanes to restart their operations. The outcomes of this waiver are as follows:

1. Development of an outreach and dissemination process by providing on-site orientation, related to the eligibility criteria, documentation and application processes. Were completed 1,453 orientations to small business and had been received 669 applications for the grants.
2. A policy and procedure to capitalization of business was approved by de PR Department of State and is in place to continue the implementation of this waiver request once approved.
3. The DEDC create an ad-hoc Business Capitalization Committee, in charge of evaluate and approve the applications, after the pre-screening process performed by case managers.
4. Until December 31, 2019, the Committee evaluated the 669 applications, with 499 approved, 153 rejected and another 17 that did not comply with the eligibility process.

5. From the total approved, 496 business completed the entrepreneurship training as part of the requirement for delegation of funds.
6. Total funds approved until December 31, 2019 were \$2,308,437.57, with a balance of \$191,562.43, related to the \$2,500,000 approved for business capitalization.
7. The Workforce Development Program have developed a follow-up process to verify the use of funds by business and the policy described before, including penalties and sanction for the wrong use of federal funds.

**Statutory and/or regulatory requirements to be waived:**

**Indicate which part of the WIOA or the regulations the state would like to waive.**

PRDEDC requests a waiver to the WIOA Section 181 (e), Limitation on Use of Funds. This section establishes that no funds available to carry out an activity under this title shall be used for employment generating activities, investment in revolving loan funds, **capitalization of businesses**, investment in contract bidding resource centers, economic development activities, or similar activities, that are not directly related to training for eligible individuals under this title.

Due to the economic breakdown after emergencies like hurricanes, earthquakes and COVID-19, the small and the medium sized businesses were the most affected by these natural disasters and disease. Many small businesses had to close operations because they were not able to face the loss of revenue and an economy in crisis for years to come.

**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.

**Goals and expected programmatic outcomes of waiver:**

**Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.**

The expected outcomes from this waiver for the PRDEDC are as follow:

- Support Puerto Rico's small business and entrepreneurial start-up economy.
- Accelerate the economy and the labor market restoration;
- Complete the evaluation of 100% of application submitted under this waiver.
- Approve at least 90% of application evaluated by the committee.
- Achieve the restart or maintain operation in 90% the business impacted by the capitalization funds
- Avoid layoff of employees of small and medium business affected by emergencies
- Rise at least 95% of expenditure in fund allocated under this waiver.

**Department of Labor's policy priorities:**

**Describe how the waiver will align with the Department's policy priorities:**

- 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 flexibilities and thereby achieving greater access to employment opportunities;
- 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 their return to full-time employment;

**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.**

- Businesses, particularly small and medium-sized businesses needing to retain current workers, and/or hire additional workers to sustain or expand their productivity, and that do not have immediate resources to do so;
- Small business employees who will be able to retain their jobs, and
- Unemployed and underemployed workers.

**Process for monitoring progress in implementation:**

The Workforce Development Program (WDP) of PRDEDC developed waiver guidelines and policies, and will measure the impact of waivers on performance outcomes. The WDP will monitor progress under this waiver by reviewing performance reports, and

through its monitoring and performance accountability system. The Monitoring Unit will be adding the monitoring of waivers to its monitoring processes in order to insure compliance with waiver guidelines.

**Process for Notice of Local Boards and Opportunity to Comment:**

The unified plan and the waiver request will be published for a period of two (2) 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.

**Waiver Impact:**

**Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.**

The Workforce Development Program will prepare quarterly reports regarding this waiver. The report must include the number of approved businesses, fund 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.