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**Executive Committee Meeting  
Thursday, March 3, 2022 at 11:00 a.m.**

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**AGENDA**

- I. Welcome and Opening Remarks ..... Mr. Thomas Freeland, SWDB Chair
- II. Approval of Minutes from November 30, 2021\* .....Mr. Freeland
- III. WIOA State Plan Modification\* .....Ms. Jackie Taylor
- IV. SWDB Funding Recommendation\* .....Ms. Nina Staggars
- V. Committee Activity Reports ..... Committee Chairs
- VI. Other Business/Adjourn.....Mr. Freeland

\*Denotes voting item

**Governor’s State Workforce Development Board  
November 30, 2021 Executive Committee Meeting Minutes**

**MEMBERS PRESENT:**

Mr. Thomas Freeland  
Mr. Pat Michaels  
Mr. Jay Holloway  
Mr. Charles Brave, Jr.  
Ms. Valerie Richardson  
Mr. John Uprichard  
Mr. Warren Snead  
Mr. Dan Ellzey

**MEMBERS EXCUSED:**

Mr. John Uprichard

**Welcome and Opening Remarks ..... Mr. Thomas Freeland, SWDB Chair**

Mr. Thomas Freeland, SWDB Chair, called the meeting to order at 11:00 a.m. A quorum was present.

**Approval of Minutes from September 14, 2021\* ..... Mr. Freeland**

Mr. Charles Brave motioned to approve the November 30, 2021, meeting minutes. Mr. Warren Snead seconded the motion and the Committee unanimously approved the minutes.

**Waiver of State Specific Requirements\* ..... Ms. Abby Linden**

Ms. Abby Linden presented the Waiver of State Specific Requirements State Instruction Letter (SIL) for approval by the Committee. State-specific requirements can often limit a Local Workforce Development Area’s (LWDA) ability to implement new and innovative practices. The SIL under review will allow LWDA’s to request a waiver of state-specific requirements such as state-specific fiscal and programmatic performance measures and state policies, when the implementation of promising practices would prevent the area from meeting or complying with the requirement(s). DEW sent the draft waiver policy to LWDA’s for review and comment. LWDA’s were appreciative of the opportunity to comment but did not submit any comments that required revision to the draft. Ms. Michelle Paczynski offered clarification on the purpose of the policy, explaining that the policy will offer flexibility to LWDA’s that are interested in pursuing promising practices and innovative strategies. Mr. Jay Holloway motioned to approve the Waiver of State Specific Requirements policy. Ms. Valerie Richardson seconded the motion and the Committee unanimously approved the policy.

**SWDB Funding Recommendation\* ..... Ms. Nina Stagers**

Ms. Nina Stagers presented a \$4.62M funding recommendation to the Committee, including funding for a Rural Economic and Workforce Analysis and Resiliency Grant funding for LWDA’s:

- *Rural Economic and Workforce Analysis - \$120,000:* DEW will engage the University Of South Carolina Moore School Of Business to conduct a Rural Economic and Workforce Analysis. The evaluation will inform the SWDB and workforce system on rural demographics and training recommendations to address the demand for a skilled workforce. DEW expects completion of the analysis in PY’21.
- *LWDA Resiliency Grant - \$4,500,000:* Current LWDA funding levels are nearly \$20M less than funding levels during peak periods of recovery from the Great Recession. DEW will use the LWDA Resiliency Grant to provide funding to local areas for staffing, operational

\*Denotes voting item

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costs, and employment and training activities that are necessary to rebuild the state’s workforce and help employers fill open positions with skilled individuals.

Ms. Stagers explained that the LWDA Resiliency Grant is a discretionary funding opportunity for which LWDA’s will submit an application for funding. She also shared that DEW sought input from LWDA’s in the development of the funding opportunity. Mr. Brave motioned to approve the funding recommendation. Mr. Richardson seconded the motion and the Committee unanimously approved.

**Committee Activity Reports..... Committee Chairs**

Committee Chairs shared 2nd quarter committee activity reports, highlighting progress toward completion of PY’21 priorities.

*Board Development Committee*

Mr. Pat Michaels shared that the Board Development Committee (BDC) (formerly the Board Governance Committee) recently reviewed its charter to ensure role and functions remain relevant and contribute to the overall mission of the SWDB. The Committee also adopted a new name to more closely align with its renewed purpose of “preparing, assisting, and equipping the SWDB to govern the state’s public workforce system.” Key functions of the BDC will include:

- Equip SWDB members with resources and tools to be leaders and drivers of workforce development
- Provide opportunities for SWDB members to be engaged with workforce efforts and support SWDB initiatives
- Develop and monitor board-related policies
- Gather and present promising practices for board development and management
- Facilitate recognition of board members.

For PY’21, the committee will:

- Research and compile promising practices for board member engagement and overall management of the board
- Provide ethics and diversity, equity, and inclusion training to board members
- Distribute a Satisfaction and Board Development Survey to SWDB members
- Review/revise SWDB bylaws and policies

*Collaboration and Partnership Committee*

Increasing the utilization of work-based learning is a key priority for the Collaboration and Partnership Committee. Ms. Richardson summarized a work-based learning funding analysis presented at the Committee’s 2<sup>nd</sup> quarter meeting. The analysis identified more than \$27M invested in work-based learning across multiple funding sources including DOL funding through Apprenticeship Carolina and SC Works, and SNAP Employment and Training funding for Department of Social Services clients. Ms. Richardson explained that the SWDB will track increases in work-based learning for WIOA programs using the WIOA Productivity Dashboard, which will track work-based instruction, work experience, and Incumbent Worker Training, as

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well as other participant and financial data. She highlighted the Lower Savannah Workforce Development Area for its utilization of work-based learning, as shared with the C&P Committee by Mr. André Anderson, Workforce Development Administrator.

With regard to the WIOA State Plan, Ms. Richardson shared that WIOA partners are currently reviewing and updating the WIOA State Plan in anticipation of submitting the required 2-year modification in the spring.

*SC Works Management Committee*

Mr. Warren Snead reported that staff have reviewed and revised the SC Works Certification Standards. Following a public comment period, DEW received comments from three entities, which resulted in revisions to:

- Define terminology
- Limit certain standards to specific programs
- Update language to reflect current regulations
- Remove standards to avoid duplication and/or align expectations with current center operations

Mr. Snead explained that DEW will release the revised standards by the end of January 2022, and that local areas will have until June 30, 2022, to complete the certification process.

The SC Works Management Committee also received a PY’20 local area performance summary at its 2<sup>nd</sup> quarter meeting. Five (5) local areas failed to meet one or more fiscal and/or negotiated program measures for PY’20: two (2) LWDA’s did not meet state fiscal performance measures and three (3) LWDA’s did not meet negotiated performance measures. All five (5) LWDA’s submitted written explanations summarizing barriers preventing them from meeting performance.

*Committee on Workforce Innovation*

In furtherance of the Committee’s goal of distributing relevant publications and Labor Market Information (LMI) to the SWDB, Mr. Holloway shared that DEW sent the September issue of its Trends Publication to all members. The publication includes relevant data and statistics. The September issue features data on job openings, new hires, and layoffs and discharges. He reported that staff is developing LMI training to help Board members understand how to use data and statistics for strategic planning and decision-making.

Mr. Holloway also summarized a presentation by Ms. Kim Bowman, Founder, SC Rural Innovation Network (SCRIN), on the development of Digital Economy Ecosystems (DEE) in Williamsburg, Barnwell, and Orangeburg counties. A DEE is a mix of technical education, job training, and community planning to bring digital jobs, local entrepreneurship, and remote work opportunities to rural communities. SCRIN is evaluating Newberry and Greenwood as future project sites.

**Other Business/Adjourn.....Mr. Freeland**

Mr. Freeland shared highlights from the October 19, 2021, Workforce Symposium hosted by the SC Chamber of Commerce and sponsored by DEW and the SWDB:

- More than 180 individuals registered for the Symposium, representing business and industry, education, workforce and economic development entities

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- Approximately 60 percent of registrants attended for the first time
- Survey respondents liked the session topics, speakers, and event flow
- Approximately 80 percent of respondents said they will recommend the event to a friend or colleague

Mr. Freeland reminded members of the upcoming SWBD meeting on December 14, 2021. The meeting adjourned at 11:36 a.m.

# South Carolina WIOA State Plan Priorities PYs 2020-2023

## + Vision

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

## + Mission

To align resources to position South Carolinians to meet business needs and promote our workforce in a global economy.

## + Guiding Principles

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

## Objectives

## Priorities

## Action Steps

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

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

- 1.1.1 Benchmark current work-based learning activities and identify regional and national trends.
- 1.1.2 Develop technical assistance tools and guidance to ensure a proper framework is in place to promote work-based learning.
- 1.2.1 Review local practices in the assessment of soft-skills and provision of soft-skills training.
- 1.2.2 Recommend use of formal soft-skill assessments and curriculum as part of education or training.
- 1.3.1 Develop a data-driven framework to distribute discretionary funds.

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

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

- 2.1.1 Develop guidance that sets the expectations of enrollment in multiple programs in order to meet the education, training and supportive service needs of individuals.
- 2.2.1 Pursue a shared learning management system – a software-based platform that facilitates the management, delivery and measurement of learning across partner programs.
- 2.2.2 Train front-line staff on best practices in serving individuals with barriers to employment.
- 2.3.1 Evaluate intake and referral systems across the state to identify problems and develop policy to implement process improvements.
- 2.4.1 Develop tools and resources to help job seekers be better connected to community resources.
- 2.5.1 Share progress of industry-led, sector partnerships through strategic discussions and a public facing website.
- 2.5.2 Develop and implement a long-term technical assistance plan with state partners to sustain and grow sector partnerships.

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

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

- 3.1.1 Support efforts of the Rural Taskforce formed through the State Workforce Development Board.
- 3.2.1 Inventory and analyze career pathway programs.

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

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

- 4.1.1 Develop a method and common framework for submitting best practices to be shared across partner programs.
- 4.1.2 Develop system-wide innovation awards to incentivize best practices.
- 4.1.3 Adopt one workforce development area at a time to recognize and share innovative initiatives and programs underway, helping other areas across the state identify effective and replicable programs and learn from the success of their peers.
- 4.2.1 Develop a common framework for business engagement.
- 4.2.2 Create communication tools for business service representatives to use in sharing state and local services available to businesses.

## WIOA Combined State Plan Executive Summary

### Background

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each state must submit either a Unified or a Combined State Plan outlining a four-year strategy for the state's workforce development system. Additionally, the Governor must submit a modification to the approved State Plan at the mid-point of the four-year period to reflect any updates to the planning elements and program-specific sections.

### Type of State Plan

A Unified State Plan covers the six WIOA core programs, including –

- Adult (Title I of WIOA),
- Dislocated Worker (Title I),
- Youth (Title I),
- Adult Education and Family Literacy Act (Title II),
- Wagner-Peyser Act (Title III), and
- Vocational Rehabilitation (Title IV).

Alternatively, a Combined State Plan outlines a strategic plan for the six WIOA core programs **plus** one or more additional program partners.

South Carolina will submit a Combined State Plan covering the following programs:

- Adult (Title I of WIOA),
- Dislocated Worker (Title I),
- Youth (Title I),
- Adult Education and Family Literacy Act (Title II),
- Wagner-Peyser Act (Title III), and
- Vocational Rehabilitation (Title IV), **plus**
- Temporary Assistance for Needy Families,
- Employment and Training programs under the Supplemental Nutrition Assistance program,
- Trade Adjustment Assistance, and
- Jobs for Veterans State Grant.

### Coordination with State Plan Programs

The Combined State Plan represents a co-created strategy for expanding and developing a skilled workforce and a responsive workforce system that is accessible by all South Carolinians. Representatives

from each of the covered programs participated in the development of shared priorities and action items, leading to the approval of South Carolina's four-year plan. The SC Combined State Plan took effect July 1, 2020, covering program years 2020 through 2023 (July 1, 2020 through June 30, 2024). In preparation for the required modification for program years 2022 and 2023, State Plan partners continued to meet to address workforce priorities and action items, while troubleshooting changing workforce conditions.

### **Public Comment**

The modified program year 2020-2023 plan was posted on the SC Works website for public comment on December 17, 2021 through January 18, 2022. Comments were received from the following organizations:

- Florence County Adult Education
- Disability Rights South Carolina
- SC Technical College System, Division of Apprenticeship Carolina™
- Able SC

The comments received and recommended plan revisions are outlined in the document titled SC WIOA State Plan Comments and Responses.

### **Key Sections of the Combined State Plan**

The State Plan is organized into three key sections:

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and strategies to align and strengthen workforce development activities that support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the strategic vision and goals identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure (e.g. integrated data systems) and policies (e.g. coenrollment and referral policies) to meet its strategic goals, implement strategies for alignment, and support ongoing program development and coordination.
- The **Individual Program Plans** section includes program-specific plans for each of the programs covered in the Combined Plan. The covered programs are identified above.

### **Takeaways from the Economic and Workforce Analysis**

The Strategic Planning Elements section includes an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate. It must also include an analysis of the current workforce, including individuals with barriers to employment. Highlights of the economic and workforce analysis are provided below:

- GDP fell by over nine percent in the second quarter of 2020 but bounced back by over eight percent the following quarter. The rebound has proceeded more slowly but has surpassed the previous GDP high.
- Manufacturing represents over 15 percent of the state's economy.



- The industry sector Health Care and Social Assistance led the state in employment, followed by Retail Trade and Manufacturing.
- Many of the growing occupations are in the healthcare sector, while technological innovation is reducing the need for others.
- The top skills are those common to most of the top occupations, such as active listening, critical thinking and speaking.
- The labor force shows declining participation, while employment projections show mild growth.
- Many of the state's jobless face significant barriers to employment, requiring more intensive services and alignment across partners to prepare them for current and future employment opportunities.

### **Takeaways from Workforce Development, Education and Training Activities Analysis**

South Carolina is fortunate to have a large number of workforce development, education and training activities. The plan includes a summary of the programs and services available in our State, many of which aim to serve specific population groups, such as individuals with disabilities or offenders. However, a key weakness of these activities is that programs operate in silos and there is very little alignment and coordination creating a system that is fragmented and difficult to access, especially for individuals that are faced with multiple barriers.

The priorities and corresponding action steps discussed below address the weaknesses identified in the Workforce Development, Education and Training Activities Analysis and are intended to improve South Carolina's workforce development system for all stakeholders.

### **Vision and Goals for South Carolina's Workforce System**

The Combined State Plan must describe the state's strategic vision for its workforce development system, and the goals for achieving this vision. This section must include goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment, and goals for meeting the needs of employers. The plan includes the following vision and strategic goals.

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

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

Strategy 1.1 Increase participation in work-based learning activities, including registered apprenticeships by partnering with Apprenticeship Carolina.

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

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

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

Strategy 2.1 Increase co-enrollment across partner programs.

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

Strategy 2.3 Streamline intake systems and referral processes.

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

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

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

Strategy 3.1 Identify the challenges and opportunities in rural communities.

Strategy 3.2 Develop career pathway tools and templates.

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

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

Strategy 4.2 Improve strategic outreach to employers.

### **Submission and Approval**

SC Department of Employment and Workforce (DEW) staff will present the WIOA Combined Plan to the Executive Committee of the State Workforce Development Board on Thursday, March 3, 2022. Pending approval, DEW and partner representatives will submit the plan to Federal authorizing agencies by March 15, 2022.

Authorizing agencies have 90 days from the date of submission to approve the plan. States must have an approved plan in place to receive funding for the core programs.

SC WIOA State Plan Comments and Responses

SC WIOA State Plan Comments	Entity/Organization Commenting	Person Commenting	Comment	Response
1/15/2022	Florence County Adult Education	Carol Hill	p.25 Effective 1-2022, ACT Workkeys will again be the assessment used in SC. How might this text reflect that change?	A protest was filed over the career readiness award. The contract was not awarded to any vendor and it will be several weeks before we have additional information. The State Plan will reflect the appropriate vendor upon the finalization of the award.
			p.28 Effective 1-2022 Adult Ed will return to ACT Workkeys. Please see note on p.25.	A protest was filed over the career readiness award. The contract was not awarded to any vendor and it will be several weeks before we have additional information. The State Plan will reflect the appropriate vendor upon the finalization of the award.
1/18/2022	Disability Rights South Carolina	Pete Cantrell	Self-employment: We did not see the important topic of self-employment addressed in the draft. This is an important topic for people with disabilities who often use self-employment as a way to design a job to meet their abilities and needs. People with disabilities often need support from agencies like SCVRD, SCCB, and DEW in order to reach their self-employment goals.	While self-employment is not a combined partner priority in the current State Plan, supports for individuals who are interested in self-employment are available. For the VR program, a self-employment outcome is defined in 34 CFR 361.5(c)(9), and the scope of services related to self-employment is defined in 34 CFR 361.48(b)(19). SCVRD is currently working with the Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE) for guidance on an updated self-employment policy. The current self-employment policy reflects that SCVRD will work with consumers to ensure they work with the U.S. Small Business Administration (SBA), Service Core of Retired Executives (SCORE) or the Small Business Development Centers (SBDC) for basic business administration courses, counseling and the development of a business plan. Also, upon approval, VR will assist with up to \$3,500 for initial stock and supplies. Self-employment has always been an outcome that SCCB has spent time developing on an individual need basis. While not specifically addressed in the State Plan, self-employment has always been an employment option used by SCCB. With the introduction of customized employment opportunities through WIOA and the support of our community partners, SCCB will have an opportunity to tailor self-employment to meet the needs of those with significant disabilities and self-employment. Similar to SCVRD and SCCB, WIOA Title I programs support individuals with employment plans inclusive of entrepreneurship through connecting individuals with SBA, SCORE or the SBDC. Additionally, WIOA Title I Youth program are required to ensure access to all 14 Youth program elements, which includes Entrepreneurial Skills Training. Self-employment can be impacted by ensuring individuals have access to community resources, including access to adequate broadband resources (especially in rural areas) and referrals for start-up costs and business plan development. While we cannot directly impact broadband access, collaborating with local projects such as the Digital Economy Ecosystem in both Barnwell and Williamsburg, lay foundations for people, programs, and structures to work together to make it possible for technology-based entrepreneurs, businesses, and workers to thrive. The project's primary goals are to improve digital literacy, support digital skills training, introduce remote work opportunities, identify and support entrepreneurial efforts and change the conversation and culture around the future of work.
1/18/2022	Disability Rights South Carolina	Pete Cantrell	Remote Work: Another important topic that we did not see addressed is remote work. Because of the COVID-19, pandemic many workers across this state and nation were forced to work from home. We learned that many jobs can be done well while working remotely. This is an important topic that should be discussed in the draft. It is of particular importance to people with disabilities who often benefit from this option or need it in order to work.	Remote work and hybrid work models are identified on page 26 as desired flexible benefits of many job seekers. SCVRD has not seen a significant increase in people with disabilities seeking agency support specifically for obtaining or maintaining remote work. However, for those who are determined eligible for services, SCVRD addresses assistive technology and rehabilitation engineering needs, as well as other reasonable accommodations to enable employment outcomes that are consistent with individual preferences. The location of the job does not impact service delivery. In the disability community, working from home has been an option for many years. It may be a new concept to traditional working environments, but it is not new to those who work with individuals with disabilities. SCCB feels that the rest of the workforce is just now learning what a handful of agencies that work with people with disabilities have been doing for decades. With the merging of traditional work with remote options, employers will be more open to the possibility of employing those with disabilities. Many employers are afraid of what changes would have to be made to accommodate those with disabilities at a structural level; with that barrier eliminated, employment opportunities should increase. Remote work is acknowledged as a viable and growing option for many job seekers and employers. Business Services Teams work with employers to support their workforce needs. At the same time, case managers in the SC Works Centers communicate job opportunities that support an individual's needs along a career pathway. Partners have developed and supported Priority 1.2, "Increase the formal assessment of soft skills and provision of soft skills training," which has an impact on an individual's ability to succeed in remote work. An in-depth analysis of national and state-specific labor market information was conducted, including key skills listed in job postings (noted on page 62). The study determined that one of the six essential soft skills valued by employers today is Digital Literacy. Promoting the inclusion of Digital Literacy in partner soft skill instruction supports the development of a job seeker's skills needed to navigate remote and in-person work.
1/18/2022	Disability Rights South Carolina	Pete Cantrell	Transportation: Transportation is a huge barrier to work for people with disabilities as noted in both the SCVRD and the SCCB sections of the report. See pp. 217 & 284. Transportation is also discussed in Strategy 2.4 on p. 65. The draft proposes to address this problem with a tool to develop a transportation plan for an individual. This is certainly helpful for some. It is not the type of comprehensive plan that is needed to address this barrier to work.	The strategies outlined to address transportation barriers in South Carolina are consistent with the capacity of the WIOA partner programs. The kind of comprehensive plan suggested is beyond the scope and resources of the state plan and its partner agencies. SCVRD continues to develop partnerships to address transportation needs across the state and has received guidance from the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) on revising Transportation policy to be consistent with 34 CFR §361.5(c)(56). There is not a comprehensive plan in place to address transportation on a macro level because there is a myriad of contributing factors that must be considered. As our services focus on the needs of the individual and the resources available in their specific community and those resources will vary from region to region through our state. We feel that this issue is bigger than just the agencies involved here. Many places in our rural state have infrastructure issues that will need to be addressed to make transportation widely available throughout our state. As such, partners have developed and made available a tool to navigate transportation options with SC Works customers. In addition, many workforce programs have supportive service policies that include assistance with the financial aspect of the transportation barrier. Understanding the limited capacity of employment programs within the topic of transportation, partners look to innovative ways of supporting job seekers of whom transportation is a barrier, including virtual case management, the virtual job fair platform, statewide virtual workshops, and improving digital skills in support of remote work opportunities through soft skill instruction.

SC WIOA State Plan Comments and Responses

SC WIOA State Plan Comments	Entity/Organization Commenting	Person Commenting	Comment	Response
1/18/2022	Disability Rights South Carolina	Pete Cantrell	<p>Impact of Disability on Priority Populations: The Workforce Analysis beginning on p. 28 mentions several priority populations. One of those is individuals with disabilities. The draft does not discuss, however, the impact of disability on most, if not all, of the priority populations. For example:</p> <ul style="list-style-type: none"> <li>o Juvenile offenders often have mental illness or intellectual disabilities.</li> <li>o Ex-offenders often have mental illness or substance addiction.</li> <li>o Veteran's often have disabilities associated with their service including traumatic brain injury, hearing loss and PTSD.</li> <li>o Homeless individuals often have mental illness or substance addiction. Addressing unemployment in these priority populations will require addressing the impact of disability.</li> </ul>	<p>The Workforce Analysis section will be updated to reflect how the intersections of disabilities and other employment barriers are addressed, specifically by SCVRD. SCVRD currently has counselors assigned to work with diverse populations including:</p> <ul style="list-style-type: none"> <li>o Juvenile offenders who have mental illness or intellectual disabilities <ul style="list-style-type: none"> <li>- There is a counselor assigned to the Department of Juvenile Justice (DJJ) &amp; Wil Lou Gray Opportunity School (WLGOS)</li> </ul> </li> <li>o Ex-offenders who have mental illness or substance addiction <ul style="list-style-type: none"> <li>- There is a counselor in each office who is assigned to work with ex-offenders.</li> </ul> </li> <li>o Veterans with disabilities associated with their service including traumatic brain injury, hearing loss and PTSD <ul style="list-style-type: none"> <li>- There are counselors in each office assigned to work with veterans, Traumatic Brain Injury (TBI), Deaf or Hard of Hearing (DHH), and consumers served by the Department of Mental Health (DMH).</li> </ul> </li> <li>o Homeless individuals with mental illness or substance addiction <ul style="list-style-type: none"> <li>- Several SCVRD offices receive referrals from the local homeless shelters."</li> </ul> </li> </ul> <p>At SCCB we are more aware than ever of those barriers outlined in the Rehabilitation Services Administration (RSA) 911 (PD 19-03). We collect this data and send it to RSA quarterly. We recognize that many contributing factors lead to barriers for employment not only for those with a documented disability but those who have life circumstances that make it difficult to find and maintain employment. Using community resources now that the data is collected is key to identifying opportunities for growth in addressing these barriers.</p> <p>While VR and SCCB offer workforce services for individuals with documented disabilities, many of the individuals served in SC Works Centers may have undisclosed employment barriers, including disabilities, that SC Works staff assist in meeting their employment goals. Staff encourage the disclosure of employment barriers in order to match job seekers to appropriate services and supports. The SC Works Center MOUs include a referral process agreed to by all partners.</p>
1/18/2022	Disability Rights South Carolina	Pete Cantrell	<p>Unemployment rate v. workforce participation rate: The section on people with disabilities on page 29 discusses the unemployment rate for people with disabilities. This figure understates the seriousness of the problem. A better way to demonstrate this problem is by using the employment to population rate as is shown in the SCVRD section. p. 212. The Labor Force participation rate (which may be the same as the employment to population rate) is discussed in the draft, but no comparison is made to the figures for people with disabilities. p. 30.</p>	<p>The workforce participation rates of the general population on pages 30-31 are from 2020 and 2021. The rates for disability populations on page 213 are from 2017, and were the most current available when retrieved and included in VR's 2019 triennial Comprehensive Statewide Needs Assessment (CSNA). Because the rates for the general population are so much more recent than those for disability populations, no comparison can be responsibly made. However, until the next CSNA is conducted, the most recent data for people with disabilities are the basis for content in the WIOA State Plan.</p>
1/18/2022	Disability Rights South Carolina	Pete Cantrell	<p>People with disabilities are available to expand the workforce: The draft indicates that many sectors are "actively seeking ways to expand their workforce." p. 30. The draft contains no discussion of people with disabilities as a way to do just that. The employment to population numbers in the SCVRD section on p. 212 demonstrate the large numbers of people with disabilities who are available to address that need.</p>	<p>The discussion on State Workforce Development Capacity, beginning on page 39, explains multiple work-based learning activities that assist people with disabilities in gaining the skills needed to qualify for jobs that are available in the state. Some examples include VR-coordinated job tryouts, Work-Based Learning Experiences for students with disabilities, VR Job Readiness Training, and soft skills training as part of VR's Pre-Employment Transition Services and Job Preparedness Instruction curricula.</p> <p>Additionally, Business Services Teams present in all 12 local workforce areas, discussed throughout the Plan, are a vital mechanism of coordinating services and outreach to employers regarding the populations served in the SC Works System, including job seekers with disabilities.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 11 – Strategy 1.1- please add "including registered apprenticeships by partnering with Apprenticeship Carolina"</p>	<p>Strategy 1.1 has been modified to reflect the expectation of partnering with Apprenticeship Carolina.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 42: Please change 36,354 registered apprentices to 37,562 Please change 1,186 registered programs to 1,193 Please change 275 youth apprenticeship programs to 278</p>	<p>The data has been updated as of January 24, 2022, while including a footnote noting the access date of the Apprenticeship Carolina website.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 44: pre-apprenticeships are designed to .... succeed on registered apprenticeship at least one registered apprenticeship Recommendation to reference that Apprenticeship Carolina certifies pre-apprenticeships for providers. Pre-apprenticeships are not locally vetted.</p>	<p>The paragraph was updated to reflect the following: Pre-apprenticeship programs are not registered or regulated by DOL as with Registered Apprenticeships. However, Apprenticeship Carolina, through the SC Technical College System, can certify pre-apprenticeship programs for providers.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 55 Apprenticeship Carolina, with the SC Technical College System.... to increase registered apprenticeship opportunities. Please add registered.</p>	<p>"Registered" was added.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 122: "Public or private training provider, including community-based organizations, joint-labor management organizations, pre-apprenticeship programs, and joint labor-management organizations"- Apprenticeship Carolina recommends that all pre-apprenticeships are certified as high-quality pre-apprenticeships under Apprenticeship Carolina</p>	<p>The Eligible Training Provider Requirements section on page 122 reflects the statutory requirements within WIOA § 122. While certification by Apprenticeship Carolina for pre-apprenticeship programs is not required for inclusion on the ETPL, the value of a certified program by the technical college system is acknowledged.</p>
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	<p>Page 122: Registered apprenticeships in SC can also be found on <a href="https://www.apprenticeship.gov/apprenticeship-job-finder">https://www.apprenticeship.gov/apprenticeship-job-finder</a> and <a href="http://www.apprenticeshipcarolina.com">www.apprenticeshipcarolina.com</a></p>	<p>This section is specific to ETPL requirements. However, the additional websites were reflected in the following paragraph on page 121: Individuals have many avenues to view Registered Apprenticeship (RA) opportunities in SC including, <a href="https://www.apprenticeship.gov/apprenticeship-job-finder">https://www.apprenticeship.gov/apprenticeship-job-finder</a>, <a href="http://www.apprenticeshipcarolina.com">www.apprenticeshipcarolina.com</a>, and <a href="http://scpath.org">scpath.org</a>. The Palmetto Academic and Training hub (PATH), via <a href="http://scpath.org">scpath.org</a>, is a resource used by Title I case managers to inform participants of registered apprenticeship programs that are eligible to receive WIOA funding through an Individual Training Account. PATH is used to make program information about registered apprenticeships available to the public, while serving as a tool for Title I case managers to inform participants of the career and training options available through Title I funding.</p>

SC WIOA State Plan Comments and Responses

SC WIOA State Plan Comments	Entity/Organization Commenting	Person Commenting	Comment	Response
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	Page 126: Recommend for SCDEW to add that they will coordinate with Apprenticeship Carolina on sending out the inclusion notice to registered program sponsors. "the inclusion notification is emailed in conjunction with the state's DOL OA, semi-annually to reach registered apprenticeship program sponsor within South Carolina, informing apprenticeship sponsors of their ETPL automatic eligibility by virtue of their registration with DOL OA.	SCDEW will provide awareness to Apprenticeship Carolina each time the semi-annual notification is released.
1/18/2022	SC Technical College System, Division of Apprenticeship Carolina	Amy Firestone, Ph.D.	Pages 187, 189, and 192, 195, 199, 249, 345, 367, 368: Please add "registered" in front of every mention of apprenticeships	Registered apprenticeship is emphasized in Priority 1.1. However, limiting apprenticeship opportunities to solely those registered may omit additional work-based learning opportunities, such as Industry-Recognized Apprenticeships.
1/18/2022	Able SC	Kimberly A. Tissot	1. Employment barriers are discussed in the plan, but how these barriers disparately impact the lives of people with disabilities (e.g. transportation, healthcare, etc.) are not addressed in a meaningful way. For instance, the plan mentions the COVID-19 pandemic and its impact on employment; however, the plan does not specifically address COVID-19's impact on employment for people with disabilities. People with disabilities are at greater risk for having their health, and in turn, their employment impacted. Another concern that is not addressed is the impact of long COVID on SC's employment efforts and plans to address that impact.	SCVRD conducts a triennial Comprehensive Statewide Needs Assessment (CSNA) upon which the Vocational Rehabilitation section of the WIOA Combined State Plan is based. The most recent CSNA was conducted in 2019 and informs the 2020-2023 State Plan. The State Plan addresses strategies to assist job seekers with greater risk of acquiring COVID-19, including remote service delivery and accessing certain services online. In regards to long COVID, not enough is known at this time about its effects and impacts on employment to plan for how to address it; but, SCVRD will continue to review medical records, and applicants' eligibility for services will still be dependent upon meeting federal criteria for participation in the VR program. SCVRD continues to develop partnerships to address transportation needs across the state. The agency has received guidance from the VRTAC-QM on revising Transportation policy to be consistent with 34 CFR §361.5(c)(56).
1/18/2022	Able SC	Kimberly A. Tissot	2. State barriers and real solutions aren't addressed thoroughly. Given that our state continues to have low employment outcomes for people with disabilities, it must be recognized that significant improvements are needed. While the plan frequently highlights everything that South Carolina is doing right, the areas of weakness are not outlined to the same degree, and plans of action lack the necessary detail and data outcomes to truly effect the change that needs to take place. For instance, pg. 220 states "Services for individuals with intellectual disabilities have been an area of focus for SCVRD, and the percentage of consumers served with intellectual and learning disability reflect this (21.4% of all consumers and 64.7% of consumers aged less than 25 years)." Not only does the plan not accurately give the data on how many individuals with intellectual disabilities SCVRD is serving, but it also fails to give steps SCVRD is taking to address their current area of focus. Able SC's recommendation is for SCVRD to set a yearly target goal for the number of individuals with intellectual disabilities to be served through their agency, based on the current number served, and share a concrete plan to achieve that goal.	The quotation from page 220 is part of the needs assessment section of the document. This is not where strategies and goals are addressed. SCVRD has identified people with intellectual disabilities and people with Autism Spectrum Disorders as target populations for enhancement of direct outreach and development of referral sources. The agency has set goals regarding referral proportions for intellectual disabilities and ASD in its annual strategic plan. For SFY 2022, this goal is 10.0% of referrals, as described in the strategic planning template on page 243. SCVRD outlines strategies to serve individuals with intellectual disabilities including partnering with LEAs, collaborating with Project SEARCH, sequencing services with SCDDSN, and working with South Carolina's DD Network (DD Council, Center for Disability Resources, and Disability Rights SC). The percentages included are not measures of "how many individuals with intellectual disabilities SCVRD is serving," but rather the proportion of those served who have the specified disabilities. These percentages were calculated using internal case service data, based on standardized cause and impairment codes used to establish eligibility.
1/18/2022	Able SC	Kimberly A. Tissot	3. Customized employment is mentioned several times in the plan related to SCCB's provision of this service; however, customized employment is not mentioned as it relates to SCVRD. Customized employment is a best practice approach and is included in WIOA as an avenue for supporting individuals with significant disabilities in competitive, integrated employment. Additionally, the efforts of three SC Developmental Disabilities Council grants, one of which Able SC leads, centered around customized employment are not included in the plan. We recommend that SCVRD work collaboratively with state partners to craft and disseminate a roadmap for statewide implementation of customized employment.	SCVRD is currently working with state partners and the VRTAC-QM to develop policy, standards, and procedures to purchase Customized Employment services from a qualified provider network for eligible individuals with disabilities for whom Customized Employment is an appropriate service. Customized Employment is defined as an authorized activity under the scope of vocational rehabilitation services for individuals with disabilities in 34 CFR 361.48 and defined in 34 CFR 361.5(c)(11)(i).
1/18/2022	Able SC	Kimberly A. Tissot	4. As mentioned in Able SC's public comment in 2018, noticeably absent is the current number of people with disabilities employed through 14(c) programs (typically segregated, subminimum wage employment), and the current efforts to phase out subminimum wage through SC bill S. 533.	None of the WIOA State Plan partner agencies use provisions of 14(c). All partners comply with section 511 of the Rehabilitation Act and support all program participants in seeking competitive, integrated employment.
1/18/2022	Able SC	Kimberly A. Tissot	5. At the bottom of pg. 231 of the plan, it is noted that "[b]ased upon verifiable VR agency data over a three-year period (SFY 2017 – SFY 2019), on average, 73.30% of the students with disabilities that were offered required Pre-ETS activities did not accept such services." This data is concerning that the majority of students with disabilities offered Pre-ETS activities chose to not accept those services. We know these services are invaluable. We would pose these questions: Are there any current efforts by VR to determine why so many students chose not to participate in Pre-ETS activities? Are there any efforts to get more students with disabilities interested and engaged in Pre-ETS activities?	The data cited from page 231 are for state fiscal years 2016 – 2019, as reported in the most recent CSNA (2019). Since those years, as Pre-Employment Transition Services have become more familiar, declinations have decreased. SCVRD has Transition Counselors assigned to each public school in South Carolina to initiate Pre-ETS with students. There are also other initiatives such as Career BOOST, Pre-ETS Contractors and other specialty projects to educate students, teachers, and families about the benefits of receiving Pre-ETS.

SC WIOA State Plan Comments and Responses

SC WIOA State Plan Comments	Entity/Organization Commenting	Person Commenting	Comment	Response
1/18/2022	Able SC	Kimberly A. Tissot	6. Please note the following revisions and additions to information about Able SC programs. a. On pages 50-51 (SC Disability Employment Coalition section), the SCDEC partners were listed. We would suggest keeping the partners listed because those are our MOU partners but adding that the SCDEC has over 40 partnering organizations including the partners listed. In addition, please add that the SCDEC is led by Able SC and was formed in 2014.	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6b. Under the individuals with disabilities section (pg. 50), please add Hire Me SC: People with disabilities can work, want to work, and should be afforded every opportunity to work. Powered by Able SC and the South Carolina Disability Employment Coalition, Hire Me SC is a statewide campaign and resource hub that promotes a culture of inclusion across the state of South Carolina, one in which employment for every individual, disability or not, is the norm rather than the exception. Whether you're looking for a job training program, resources to help you empower or hire an individual with a disability, or a platform to join in advocacy for policy change, Hire Me SC can help.	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6c. Under the individuals with disabilities section (pg. 50), please add the SC Association of People Supporting Employment First (APSE): Established in 2018, South Carolina developed a statewide APSE chapter. APSE is the only national membership organization focused exclusively on Employment First to facilitate the full inclusion of people with disabilities in the workplace and community. APSE members recognize that everyone has abilities to contribute, and their work should be recognized and rewarded with fair pay, creating inclusive workplaces. Employment enriches and adds meaning to every life, and workplaces and communities are enhanced when they embrace differences.	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6d. On page 51, it is noted that Walton Option and Able SC are WIPA providers; however, as of July 2021, Able SC is the WIPA provider for the state of South Carolina (Walton Options now provides WIPA services in the state of Georgia only).	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6e. On page 215, the Disability Employment Coalition is noted. Please change the Coalition to the "SC Disability Employment Coalition" and note that the Coalition is led by Able SC. The Employment First Initiative is also mentioned; however, it should be noted that the federal funding for the initiative ended in August 2021, but the partners continue to meet monthly and work on eliminating employment barriers in our state.	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6f. At the end of page 246, the plan notes "SCVRD is one of 14 partners working together on a Partnerships in Employment (PIE) grant awarded to SC Disability Employment Coalition. SC has six pilot sites with a focus to increase employment outcomes for youth with intellectual and other developmental disabilities. This is done in line with SC's Employment First Initiative." It should be noted that SC's Employment First Initiative ended in August 2021, but the partners continue to meet and work on systems change issues.	Identified updates to be made.
1/18/2022	Able SC	Kimberly A. Tissot	6g. At the end of page 283, Transition Alliance of SC's (TASC) partners are noted, and Able SC should be included as a partner of TASC.	Identified updates to be made.