

*Comment:*

**Title IV** - On behalf of the South Carolina Department of Disabilities and Special Needs (“DDSN”), please accept these comments on the South Carolina WIOA State Plan (2024-2027). DDSN is the agency in the state, established by law, as having authority over all of the state’s services and programs in support of people with the following life-long disabling conditions:

- Intellectual Disabilities/Related Disabilities
- Autism Spectrum Disorder (“ASD”)
- Traumatic Brain Injury /Spinal Cord Injury /Similar Disability

DDSN does not have authority over services delivered by other agencies of the State such as those services delivered by the South Carolina Vocational Rehabilitation Department (“VR”). DDSN must rely on other state agencies, including VR, to ensure citizens who are DDSN-eligible receive the other services to which they are entitled, including assistance with employment.

DDSN prioritizes competitive integrated employment as the preferred outcome for all working-age adults, including those with most significant disabilities. Given the importance of competitive integrated employment for all adults, VR services are crucial to those citizens who are DDSN-eligible and especially to those with most significant disabilities. In May 2022, the State of South Carolina enacted legislation to end payment of subminimum wages to workers with disabilities by August 2024. The ending of the payment of subminimum wages further exemplifies the tremendous needs of those who are DDSN-eligible and require VR services to be employed.

DDSN understands that those who are eligible for the agency’s services have life-long disabling conditions and therefore will require long-term support in order to be successfully employed. For that reason, DDSN established a program (called State Funded Follow-Along) that ensures that once VR has reached a successful outcome with a DDSN-eligible person, supports to enable the person to maintain his/her job will continue as long as needed.

Specifically, regarding the South Carolina WIOA State Plan (2024-2027), the plan itself does not include accurately numbered pages. In an effort to effectively communicate its comments, DDSN sequentially numbered the pages beginning with the cover/title page. Any page numbers referenced are reflective of this numbering convention. DDSN’s comments are as follows:

- (b) Comprehensive Statewide Needs Assessment (CSNA)-VR General Pg. 149. DDSN has reviewed the 2022 Comprehensive Statewide Needs Assessment (“CSNA”) completed by VR which can be found here: 2022 CSNA SCVRD (<https://www.scvrd.net/DocumentCenter/View/252/2022-SCVRD-Comprehensive-Statewide-Needs-Assessment-CSNA>).
- It should be noted that the CSNA (pg. 14) states “...after multiple attempts, SCVRD was not able to have the Department of Disabilities and Special Needs...participate in the Key Informant Interviews”. After much research, DDSN can find no evidence of these multiple attempts. Therefore, DDSN was not afforded the opportunity to participate in its development.

While DDSN was not afforded the opportunity to participate in the development of the CSNA, we do endorse some of its findings. Specifically, we agree that:

- The top overall employment support needs are:
  - On-the-job supports and job coaching,
  - Vocational guidance, counseling, and career exploration, and
  - Job placement.
- The top supports for people with disabilities (as identified by focus group participants and key informants) are:
  - Supported Employment including arranging long-term supports, and
  - Assistive technology/adaptive equipment.

- The top needs for individuals with the most significant disabilities are:
  - Workplace accommodations and supports,
  - Transportation assistance, and
  - Job coaching services.
- The strategy to address the needs of job seekers with most significant disabilities (as identified by focus group participants and key informants) is:
  - Increased collaboration (especially between SCVRD and DDSN)

**Response: No changes made to the State Plan**

DDSN was afforded the opportunity and did provide input for the CSNA – just not in a key informant interview. Initially, an invitation was extended via email on 5-17-22 to respond to a stakeholder survey. This email also included a request to schedule a key informant interview and a link to a poll for indicating availability. Included in the survey was a question about interest in participating in a focus group to provide more in-depth perspectives for the CSNA. DDSN’s Director of Transition Services responded to the stakeholder survey and indicated interest in participating in a focus group. As no availability was indicated by DDSN in the poll, a subsequent invitation to participate in a key informant interview was extended via email to the Associate State Director – Policy on 6-22-22. While DDSN did not respond to the invitations to engage in a key informant interview, one of the DDSN Transition Coordinators did participate in a focus group to provide input for the CSNA in addition to that provided on the stakeholder survey.

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**Entity/Organization:** *SC Department of Disabilities and Special Needs (2 of 8)*      **Person Commenting:** *Janet Priest*

**Comment:**

**Title IV -**

- The top needs for youth and students with disabilities are:
  - Job coaching and supported employment services,
  - Job skills training, and
  - Transportation assistance
- The strategies to address needs for youth and students with disabilities (as identified by focus group members and key informants) are:
  - Ensuring families and students understand the VR program and VR services, and
  - Collaborating with school districts and DDSN
- The groups of people unserved or underserved by the VR program are:
  - Those with intellectual disabilities
- The groups of people unserved or underserved (as identified by focus group members and key informants) are:
  - People with significant disabilities (intellectual disabilities and ASD)

As stated, DDSN does endorse some of the CSNA findings. For example, the CSNA indicates that through surveys, focus groups and key informant interviews it was learned that people with intellectual disabilities, including those with the most significant disabilities, are an unserved/underserved population. Currently, 21,806 South Carolina citizens of working age (16-64) are eligible for DDSN services. While some of these people have been referred to and received services from VR, that number is egregiously low. According to DDSN’s SFY 2023 data, only 268 DDSN-eligible people (1%) were referred to VR. Of those referred, 11 (4.1%) people achieved a successful employment outcome. Those 11 people represent .05% of the DDSN-eligible people of working age in the entire state. The 11 people who did during SFY2023 achieve a successful outcome are being provided on-going supports by DDSN. Certainly, DDSN is not aware of every DDSN-eligible person who may have sought or received VR services. DDSN has for over a decade attempted to track referrals made to VR on behalf of DDSN-eligible people. However, because DDSN-eligible people can independently seek VR services, and no data sharing agreement is in place, tracking to identify mutually supported people is impossible. This lack of data sharing gives credence to another CSNA finding that increased collaboration (especially between SCVRD and DDSN) is a needed strategy.

Again, DDSN endorses the CSNA finding that people with intellectual disabilities, including those with the most significant disabilities, are an unserved/underserved population. While DDSN agrees with this finding, VR appears to disagree. The CSNA (pg. 8) states, "Internal data disprove the assumption that individuals with intellectual disabilities and ASD are underserved..." The assertion that data disproves that people with intellectual disabilities, including those with the most significant disabilities are underserved/unserved is concerning and not consistent with the limited data available to DDSN. Perhaps this assertion is rooted in inconsistencies related to the specific definitions of some disabilities. The criteria by which South Carolinians are evaluated to determine if the person has a DDSN-eligible disability is established in the S.C. Code Ann. § 44-20-10 (2018) and S.C. Code Ann. Regs Chapter 88-5 (Supp. 2023). It is unclear what criteria is used by VR to determine if a job seeker has a disability that would also make him/her DDSN-eligible. It is equally unclear how VR ensures that any/all information used to evaluate a job seeker is from a credible/valid source [e.g., Autism Diagnostic Observation Schedule (ADOS) used to determine ASD and conducted by a trained evaluator]. As stated, there is no data sharing agreement between DDSN and VR which makes it impossible to ensure that those reported to have an intellectual disability or ASD do have those disabilities. As noted, according to DDSN's SFY 2023 data, only 268 DDSN-eligible people (1% of those of working age) were known to be referred to VR. Of those referred, 11 (4.1%) people achieved a successful employment outcome. The other 257 (95.9%) DDSN-eligible people who were known to be referred did not achieve a successful outcome.

**Response: No changes made to the State Plan**

If DDSN data indicate only 268 referrals of DDSN-eligible people to VR in SFY 2023, then some combination of the following can likely explain why: (1) Referrals may have been underreported by DDSN providers. VR does not control how many referrals are made from partner agencies. (2) Some DDSN-eligible individuals were self-referrals to VR (or were referred by family members). (3) Many DDSN-eligible individuals are referred by schools. Additionally, it should be noted that VR provides Pre-Employment Transition Services, including work-based learning experiences, to high school students with disabilities without requiring a referral/application or opening a VR case.

There should not be an expectation that a high proportion of working age DDSN-eligible individuals would be referred to VR in any given year. As previously noted, some have already been referred for VR services in the past, and some currently have an open VR case, while others are either seeking or maintaining employment with other assistance or do not want to pursue competitive, integrated employment at this time. For comparison, the total number of referrals that SCVRD received in SFY 2023 for all disability categories combined represented only 2.7% of the total estimated number of working age people with any disability living in South Carolina. Furthermore, people with Intellectual Disabilities and Autism Spectrum Disorders were well represented among SFY 2023 referrals to SCVRD, constituting a combined 10.3% of total referrals.

SCVRD is required to provide career counseling and education on its program services and the benefits of employment to sub-minimum wage participants annually. During SFY 2023 VR employees provided this career counseling to 1,436 sub-minimum wage participants. Of those who received education, 37 applied for VR services.

SCVRD agrees that more collaboration and data sharing with DDSN is needed.

SCVRD has a detailed eligibility policy that outlines the documentation requirements for eligibility determinations. To ensure timely assessment counselor observation may be used in some cases. However, for individuals with Autism or Intellectual Disabilities, SCVRD collects records from qualified facilities or providers familiar with diagnosing or treating these conditions. SCVRD requests specific data from the qualified medical or psychiatric professionals to identify the disability and specific issues that may affect an individual's ability to work and participate in SCVRD services. SCVRD staff are trained to not assume an individual is or is not eligible for DDSN services. SCVRD staff are trained to assess the consumer or applicant holistically, and if it is possible that services through DDSN could also be beneficial for the individual, they are trained to refer the consumer/applicant and their support system to the process for applying for DDSN services and the benefits of being jointly served by each agency.

SCVRD is unsure of the exact timeframe of the 268 referrals received by DDSN. As stated above there are likely a number of factors that have contributed to the varied success of those who are known to be referred through DDSN. And, many of those referrals are likely still being served with an open VR case.

As stated above, SCVRD agrees that more collaboration and data sharing with DDSN is needed.

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**Entity/Organization:** SC Department of Disabilities and Special Needs (3 of 8) **Person Commenting:** Janet Priest

*Comment:*

**Title IV** - It is possible that 95.9% of those referred to VR did not achieve a successful outcome because those people exited the program without an employment outcome. Information from the FY2021 Report on the Review of South Carolina Vocational Rehabilitation and Supported Employment Programs conducted by the US Department of Education, Office of Special Education and Rehabilitation Services Administration (“RSA Monitoring Report”) seems to support this possibility by noting that “a significant percentage of individuals exited the program at various stages of the VR process”. In this report, it is suggested that people exited the program because they were unable to be located/contacted or were no longer interested in receiving/continuing to receive services. The RSA Monitoring Report opines that this could be due to lack of continuing engagement by VR with applicants/participants, the provision of services that are not adequately meeting the needs of participants, or the lack of or delay in the provision of needed services. The full report can be found here (<https://rsa.ed.gov/sites/default/files/publications/fy2021-sc-g.pdf>). DDSN agrees with the findings of the RSA Monitoring Report. With input from those who have, on behalf of DDSN-eligible people, made referrals to VR, DDSN has received the following concerns regarding VR which appear to be confirmed, in part, by the RSA Monitoring Report:

- Consumers are required to attend the (VR-operated) work training center even when they advocate for where they want to work or have previously worked in the community.
- Consumers are required to attend the (VR-operate) work training center for extended periods of time and do not have any community-based experiences.
- Not attending a work training center (at all or not for the entirety) is seen as a lack of desire to work. Work training centers are not in every community or town and for some are a significant distance from their home/community.
- Poor communication between VR counselor and consumer/family/case manager.
- Jobs secured at places consumers are not interested in working.
- Individuals/family’s time and travel distance are not being considered for the initial meeting. The VR application process is unnecessarily complex.
- SCVRD generally requires an in-person application process at the VR office which can be up to 50 miles or more from the job seekers home. Many people with Intellectual Disabilities are unable to drive to the VR office.
- VR is unable to address needs of job seekers who interact with a variety of systems including mental health, intellectual disabilities, physical disabilities, and other dual/multi-diagnoses.
- VR staff are not present in most schools to provide Pre-ETS and take applications for eligibility.
- VR counselors do not contact the individual’s case manager or transition coordinator that supported the person to make the referral if they are not able to reach the individual. VR counselors will often close the case “unable to locate or contact” without communicating with the DDSN case manager.
- VR will not coordinate with DDSN to ensure an extended service provider is arranged for the individual.
- VR counselors will tell individuals and their families that they are not eligible for services prior to taking an application or providing an assessment (just by looking at them).
- VR counselors expect individuals with significant disabilities to find their own job or provide job leads instead of developing a job development plan.
- VR staff will not provide supported or customized employment to individuals with ASD only (with no additional diagnosis of intellectual disability). This was reported for more than one job seeker.
- VR Counselor has told individuals to “suck it up,” because there is “over diagnosis of ASD just like with ADHD.” NOTE: please refer to CSNA (pg. 27).
- VR staff will invoke “informed choice” when working with individuals but not individualize services and supports.

**Response:** No changes made to the State Plan

A significant percentage of individuals exit the VR program at various stages of the VR process in all states, including for the reasons 'unable to be located/contacted' and 'no longer interested in receiving/continuing to receive services.' Attrition is not a concern unique to South Carolina. Those two reasons for exit made up 55.4% of all VR program exits nationally in SFY 2023 (WIOA program year 2022). Furthermore, that these exits "could be due to lack of continuing engagement by VR with applicants/participants, the provision of services that are not adequately meeting the needs of participants, or the lack of or delay in the provision of needed services" was not established by any statistical evidence, but rather was offered as potential explanations to explore. No corrective action was required in the Monitoring Corrective Action Plan as would have been the case for findings of deficiencies. Nor did these RSA Monitoring Report findings identify any concerns with types of exits that were specific to people with ID/ASD as opposed to those common across all disability categories. Despite the levels of attrition, South Carolina ranks #4 nationally in VR participants' rates of employment in the 2nd quarter after program exit and #7 nationally in the 4th quarter after exit.

<https://rsa.ed.gov/sites/default/files/programs/vr/CSAVR%20Fall%202023%20Conference%20RSA%20Performance%20Data%20Tables.xlsx>

- Job Readiness Training (JRT) is a service that is offered but is not a requirement. All VR services are individualized. Consumers are referred to the centers based on their individualized needs, informed choice, and to enhance the consumers' job readiness to the point they can successfully achieve competitive, integrated employment. VR Counselors work closely with consumers to determine the appropriate vocational objective, training, and VR service needs prior to job placement activities.
- Job Readiness Training (JRT) is a VR service used to evaluate supports that the consumer may need while on the job and to enhance their skills, including soft skills that employers in SC have indicated are in demand. Consumers' soft skills such as time management, attendance, social skills, physical limitations etc. are evaluated. Timeframes are individualized and based on the consumer's progress.

Consumers' participation in the job readiness training center helps staff determine placement needs but is not required. Participating in JRT Services enhances the consumer's job readiness and teaches them about employer expectations. In addition, training centers provide a controlled environment where Rehabilitation Technology engineers and job coaches work one-on-one with consumers to identify and implement individualized solutions to address functional limitations. Participants also receive job preparedness instruction (JPI) courses based on their individualized "My Action Plan" (MAP) for their time at the center. Additionally, some consumers who participate at a training center receive occupational/vocational training that leads to recognized credentials, such as forklift certification and ISSA janitorial certification. The duration of services at the training center depends on the consumer's MAP goals and progress on those goals.

Community-based experiences are always available, according to the consumers' individualized VR services needs. This includes work-based learning experiences, career exploration and job tryouts in integrated settings.

- VR consumers are not required to attend and participate in Job Readiness Training (JRT) Services at the agency's training centers. The Job Readiness Training Centers are not located in every community or town; however, SCVRD has twenty-seven (27) training centers located throughout the State of South Carolina serving consumers from every county.
- Any DDSN referral that is received through the VR tracking system is uploaded to CMS where the VR counselors have the case manager's contact information. VR staff members are trained in the importance of consistent communication with the case managers throughout the life of the VR case.
- VR staff work with consumers to provide job placements based on the consumers' skills, interests, and abilities.
- There are 31 VR offices throughout the state of South Carolina so that eligible South Carolinians have access to VR services. Additionally, SCVRD has a presence at most of the SC Works centers (employment one-stops) and some SC Works access points throughout the state. And, counselors are assigned to itinerant sites, which aids in them being able to meet with applicants at locations that are convenient for the consumer if transportation to an office is a hardship.

- Applicants are not required to visit a VR office to complete the application process. Counselors are equipped with laptops, mobile hotspots, printers, etc. to meet consumers/applicants in the community. The use of platforms such as Zoom or Teams is also an option.
- Each consumer receives service based on their individualized needs. VR also partners with agencies such as DMH to provide Individual Placement and Support Services (IPS). SCVRD staff works closely with DMH staff to identify appropriate candidates for IPS. IPS emphasizes helping people obtain competitive work in the community and providing the supports necessary to ensure success in the workplace and complementary services.
- Each State must ensure that the designated State unit, in collaboration with the local educational agencies involved, provide, or arrange for the provision of, pre-employment transition services for all students with disabilities, as defined in § 361.5(c)(51), in need of such services, without regard to the type of disability, from Federal funds reserved in accordance with § 361.65

As stated above, found in the Code of Federal Regulations, SCVRD must provide OR arrange for the provision of Pre-ETS to all students who are in need of such services. SCVRD actively works to maintain cooperative agreements with each local education agency (LEA) across the state, which outline the roles of the LEA and SCVRD to provide services, to include Pre-ETS, to students in their district. SCVRD has caseloads assigned to each public school in the state, has active agreements with several virtual school programs and is actively working to increase its presence in home and private school settings.

SCVRD also actively contracts with over 30 vendors, community partners and LEAs to arrange for the provision of Pre-ETS in areas that may need additional support above and beyond what is provided by our SCVRD staff.

- The VR counselor makes several attempts to reach consumers before a VR case is closed. The VR counselor will make attempts to reach the consumer, authorized representatives, and additional contacts via telephone. If no successful contact is made via telephone, the VR counselor will then attempt to reach the consumer through mailing a contact letter. If the consumer does not respond to the contact letter, another letter is mailed to the consumer advising them that their case will be closed if they do not respond within 10 days. After those attempts have been made with no success in re-establishing communication, the VR counselor will move forward with case closure as they have been unable to contact the consumer.
- A consumer who received Supported Employment services through VR cannot be closed successfully without identifying an extended service provider and having them sign form 313 (Extended Services Provider Notification letter).
- All individuals are given the opportunity to complete an application for services. Counselors are trained to never render a determination of eligibility (formally or informally) without a completed application and adherence to eligibility determination policy. When appropriate, trial work experiences are completed to ensure appropriate assessments and decisions are made regarding case direction.
- VR counselors and job coaches work with consumers to assist them in finding employment opportunities based on their interests. Consumers participate in services by completing job searches to share with their job coach/counselor so that they can follow up. All consumers have IPE's (Individualized Plans for Employment) that indicate their vocational interests. While many VR consumers do conduct their own job search with minimal assistance, nearly 30% of jobs attained are direct placements developed by VR personnel. These placements are generally for consumers with the most significant disabilities.
- Supported Employment services are provided to our consumers who have the most significant disabilities. Supported Employment is provided to consumers whose disability interferes with the ability to understand aspects of job placement or who are unable to cope in an effective manner in a structured work environment. These limitations may include, but are not limited to the following:
  - Problems with learning and understanding specific job tasks due to cognitive impairment.
  - Problems associated with adjusting positively to co-workers, supervisors, and the actual job because of an emotional, mental or cognitive impairment.
  - Problems associated with using good judgment in completing tasks, making decisions, or interaction with others.

- Problems with effective communications that may hinder their ability to understand job tasks and interact positively with peers and supervisors.

Currently Customized Employment is a program that VR is developing and cannot be provided as a service.

- SCVRD cannot verify that any consumers have been told to “suck it up.” All VR employees are offered disability etiquette training and are expected to treat consumers with dignity and respect.
- Informed choice is based on the premise that consumers with disabilities should have influence on and input into the processes and services that affect their vocational rehabilitation. This process encourages an increased sense of responsibility and ownership by the applicant/consumer. The partnership between the applicant/consumer and the VR team increases the likelihood of successful employment and consumer satisfaction

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**Entity/Organization:** SC Department of Disabilities and Special Needs (4 of 8)

**Person Commenting:** Janet Priest

*Comment:*

**Title IV -**

- Failing to set up appointments in timely manner and failure to provide timely follow up.
- Referrals not being followed up on.
- Delaying case closures.
- VR is not using true supported or customized employment best practices models with people with ID/ASD. Those techniques appear to be reserved for other populations of VR customers.
- Fourteen (14) people who had been learning to work in a DDSN-provider operated facility-based setting and were earning subminimum wages were referred to VR. VR, in response, indicated that all fourteen (14) could be served in a VR-operated work training center (facility-based setting) if the DDSN-provider would transport all fourteen people to the work training center. The work training center is approximately 15 miles from the DDSN-provider location. It should be noted that moving from one facility-based setting to another is not the outcome most of those being referred were expecting. Instead, those being referred were expecting to be supported to find community integrated employment through which they would earn at least minimum wage.

In accordance with DDSN policy “Employment First Approach to Provision of Services” (DDSN Directive 700-07-DD), when those who are DDSN-eligible are not served or not successfully served by VR, DDSN will pay its network of trained Employment Services providers to support the person to get a job. These providers are often very successful in supporting these people to find and keep jobs (community integrated employment). It is incredibly disappointing that VR does not purchase services from CRPs but does take credit for post-closure outcomes when in reality, the DDSN provider network provided supported or customized employment services resulting in a successful employment outcome.

e. Supported Employment Services, Distribution of Title VI funds, and Arrangements & Cooperative Agreements for the Provision of Supported Employment Services Pg. 168.

**2. Most significant disabilities:**

As DDSN understands the requirements of WIOA, supported and customized employment services are to be provided in community-based settings including assessing individuals with most significant disabilities for career interests, needed supports, job stability criteria, and related activities. Regarding the mandate for community-based, individualized services provision, 34 CFR 361.5(c)(5)(ii)(E) states, “to the maximum extent possible, relies on information obtained from experiences in integrated employment settings in the community and in other integrated community settings.”

**Response: No changes made to the State Plan**

- Appointments are scheduled within 10 business days. When applications are completed and medical records are requested, there is follow up within 2 weeks of the request being sent to the medical provider.
- VR counselors utilize the DDSN referral tracking system to follow up on all referrals from DDSN. This program was developed by SCVRD Information Technology specifically for documenting the receipt, assignment, and

progress of referrals from DDSN. Area offices receive weekly notifications via email regarding any DDSN referrals in their offices that need attention.

- Case closure requests/forms that are submitted by DDSN on behalf of consumers are reviewed by the state office. If the individual has an open case with VR, the state office notifies the area office and asks that they follow up on the request. The VR counselor will then contact the consumer and their family regarding the request. The closures are not delayed, but rather the counselor first confirms that an informed decision has been made to close the case. At times, DDSN case managers encourage VR consumers to request that their VR case be closed so they can be served by a DDSN Employment Specialist. However, the consumer is often not informed that DDSN Employment Services do not include the full array of supports that are available from the VR program. If a consumer chooses to maintain an open case with VR, the DDSN case manager is notified by the SCVRD state office that the form cannot be completed due to the consumer wanting to continue with VR services.
- Individuals identified as having the most significant disability, regardless of disability, receive supported employment services through the VR program. All SCVRD services, including supported employment, are individualized based on the participant's needs.

As stated, Supported Employment is provided to individuals with the most significant disabilities. These individuals receive supported employment as a planned service when the disability interferes with their ability to understand aspect(s) of job performance or is unable to cope in an effective manner while participating in a structured work environment. Since the needs of these individuals may be associated with cognitive, emotional and/or mental impairments, the following best practices are encouraged and utilized by job coaches:

- Demonstrate how to perform complex tasks through task analysis.
- Provide strategies and/or accommodations to enhance the learning and understanding of specific job tasks.
- Offer feedback on effective communication that may be used when corresponding with co-workers, supervisors, and customers.
- Model how to appropriately respond to conflict in the workplace by using active listening skills and professional language.

As mentioned earlier, Customized Employment is a program that is being developed and cannot be offered as a service currently.

- Robert McBurney of DDSN confirmed there was an unfortunate misunderstanding regarding transportation concerning this incident. Both VR and the DDSN provider assumed the other had the resources to provide transportation to the VR job readiness training center.

SCVRD has a long history of investing in infrastructure, including personnel, to provide services in-house. This model allows for more consistency across locations and mitigates the risk of being unable to find qualified providers to meet the VR service needs in all locations of the state.

The Workforce Innovation and Opportunity Act (WIOA) encourages co-enrollment of VR program participants in partners' programs so that individuals receive all appropriate supports from complementary services. The outcomes that SCVRD reports to its federal partners (at case closure and post-exit) are strictly defined for the VR program, and SCVRD adheres to the same reporting specifications as all VR programs nationally. Data collection captures whether the VR program was involved in direct placement activities or not, regardless of the outcome of the case.

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**Entity/Organization:** SC Department of Disabilities and Special Needs (5 of 8) **Person Commenting:** Janet Priest

*Comment:*

**Title IV** - VR relies on VR-operated work training centers and other VR-operated facility-based settings rather than community settings to determine the nature and scope of VR services, including the need for supported employment. As previously noted, most DDSN-eligible people referred to VR for supported and customized employment are required to fully attend and participate in the "work training" presented at work training center or other facility-based settings in order to be determined "fit" for working. According to the RSA Monitoring Report (pg. 6), the average time a participant attends the work training center is five (5) hours per day for six (6) months. This unwritten requirement for



attendance and participation is a significant barrier; it delays job seekers' ability to receive individualized exploration, job development, and secure competitive integrated employment. Because 34 CFR 361.5(c)(37) defines supported employment as including the following, it is difficult to ascertain how the VR-operated training centers meet these requirements.

- The provision of skilled job trainers who accompany the individual for intensive job skill training at the work site;
- Job development and training;
- Social skills training;
- Regular observation or supervision of the individual;
- Follow-up services including regular contact with the employers, the individuals, the parents, family members, guardians, advocates or authorized representatives of the individuals, and other suitable professional and informed advisors, in order to reinforce and stabilize the job placement;
- Facilitation of natural supports at the worksite;
- Any other service identified in the scope of vocational rehabilitation services for individuals.

It is also worth noting that the RSA Monitoring Report (pg. 7), RSA suggested that the agency (VR) "analyze the current use and cost-benefit of the work training centers for the majority of VR participants and explore future strategies to address participants' unique needs and informed choice in its service delivery..."

### 3. Cooperative agreements:

VR currently has no cooperative agreement with DDSN. For several years, no cooperative agreement, called a memorandum of understanding ("MOU"), has been in place. Although the SC WIOA State Plan (2024-2027) states that an MOU "will be executed", the last attempt to do so was made in November 2022 when DDSN provided a draft to VR. Receipt of the draft was acknowledged by VR, but there have been no good faith efforts to negotiate its terms. Those drafted terms only included as the roles and responsibilities of VR those requirements which are delineated in 34 CFR§361 and 34 CFR §363, along with specific data to be shared.

As previously stated, unlike 54 other states and territories, VR does not engage CRPs to deliver supported and customized employment services. Allowing job seekers to access a continuum of services from a single provider, as is the case when CRPs are used, is a prevailing best practice (Supported Employment: A Customer-Driven Approach. VCU Rehabilitation Research and Training Center). Cooperative agreements are not in place with DDSN-providers who are experienced in delivering these needed services.

#### **Response: No changes made to the State Plan**

<https://rsa.ed.gov/sites/default/files/programs/vr/CSAVR%20Fall%202023%20Conference%20RSA%20Performance%20Data%20Tables.xlsx>

There are no written or unwritten requirements that any VR participant attend and participate in services at a training center. Consumers are referred to the centers based on their individualized needs and informed choice to enhance their skills, including soft skills that employers in SC have indicated are in demand. Participants also receive job preparedness instruction (JPI) courses based on their individualized "My Action Plan" (MAP) for their time at the center. Only about half of SCVRD consumers with an individualized plan for employment (IPE) receive the job readiness training service. Additionally, some consumers who participate at a training center receive occupational/vocational training that leads to recognized credentials, such as forklift certification and ISSA janitorial certification. The duration of services at the training center depends on the consumer's MAP goals and progress on those goals.

In a meeting at the DDSN Central Office on 12-13-22, SCVRD provided explanations of policy as well as data on Trial Work Experiences (TWE) demonstrating that applicants are not evaluated at training centers to determine their eligibility for VR services and that the overwhelming majority of applicants, including those with ID/ASD, are determined eligible without use of a TWE. It was also explained during that meeting and in a follow-up, email dated 2-14-23 that in the VR program, supported employment services is a post-hire service from the time of placement until transition to extended services ([https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-A/section-361.5#p-361.5\(c\)\(37\)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-A/section-361.5#p-361.5(c)(37))). As such, the VR training centers are not used at all for the provision of supported employment services. Individuals who are anticipated to need supported employment services may spend time in the training center as part

of their vocational assessment to determine a vocational objective. But that would be for a short period of time focused on identifying strengths, not determining whether or not one is “fit” for working. At that point, eligibility for VR services would have already been determined. And, anyone determined eligible is considered capable of benefiting from VR services and achieving a successful outcome of competitive, integrated employment.

Community-based experiences are always available, according to the consumers’ individualized VR services needs. This includes career exploration and job tryouts in integrated settings.

SCVRD has attempted repeatedly to negotiate a cooperative agreement with multiple DDSN points of contact. Several meetings were scheduled in 2023, with an in-person meeting that occurred in the spring. However, the MOU was not executed.

Nationally, there are 78 VR programs, and each program is structured differently. To ensure effective and timely service delivery to consumers requiring supported employment, SCVRD has employed job coaches who are staffed in each of its office locations around the state. SCVRD is currently working with the VR Technical Assistance Center for Quality Employment and the National Expansion of Employment Opportunities Network to build a customized employment program.

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**Entity/Organization:** *SC Department of Disabilities and Special Needs (6 of 8)* **Person Commenting:** *Janet Priest*

*Comment:*

**Title IV -**

f. Annual Estimates:

VR identifies employee recruitment and retention as a priority to increase service provision capacity. This priority was emphasized in the Minutes of the State Agency of Vocational Rehabilitation Agency Board Meeting of August 16, 2023. During this meeting the Commissioner of VR stated, “the first objective is retention and recruitment of staff, which continues to be challenging; not only for SCVRD, but also for other state agencies and businesses.” In the drafted SC WIOA State Plan, it states that VR expects to serve “1,500 individuals in supported employment using 53 job coaches” during the next FFY. This results in an average caseload of at least 28.3. Best practice dictates that caseloads should be “20-25 or fewer at any given time” (Supported Employment: Building Your Program. DHHS Pub. No. SMA-08-4364, Rockville, MD). It is disappointing that VR does not appear interested in meeting basic professional standards. Nationally, in 54 states and territories, the VR agency contracts with Community Rehabilitation Program (“CRP”) providers to purchase supported and customized employment services. As stated, DDSN has a trained network of employment services providers who are available to support DDSN-eligible people, and others, toward successful community integrated employment. Unlike the other 54 states and territories in the nation, in South Carolina, VR has never exercised the option of contracting with CRP’s. It seems that contracting with experienced providers would be a better solution to increasing service provision capacity than hiring inexperienced staff to take on higher than recommended caseloads.

g. Order of Selection:

The SC WIOA State Plan clearly identifies that South Carolina is not implementing order of selection. Implementing order of selection would mean that South Carolinians with the most significant disabilities would be given priority over those with less significant disabilities. Regarding those with most significant disabilities, according to the CSNA (page 39-40), “most significant disabilities” is defined as:

“...someone who meets the criteria for a significant disability and meets additional criteria set in policy by the state VR agency. In South Carolina, ... must also have two or more functional capacity limitations, not have been competitively employed, have had competitive employment interrupted or intermittently as a result of severity of the disability, have the presumption of benefit from supported employment services and require intensive on-going support services in order to maintain employment.”

Further, the CSNA also defines someone with “significant disability” as, “... one who has a physical or mental impairment that seriously limits one or more functional capacity in terms of an employment outcome (mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills), and who is expected to require multiple VR services over an extended period of time.”

Based on these definitions, it appears that to have a most significant disability, one must have:

- two or more functional capacity limitations (mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills), and
- not have been competitively employed, and
- have had competitive employment interrupted or intermittently as a result of severity of the disability, and
- have the presumption of benefit from supported employment services, and
- require intensive on-going support services in order to maintain employment.

For most DDSN-eligible people, valid and credible assessments of functional capacity limitations are available and could be provided to VR. It should also be noted that DDSN is unsure how someone could, both, not have been competitively employed and have had competitive employment interrupted or intermittently as a result of severity of the disability as stated in the CSNA; these two criteria appear to be mutually exclusive.

**Response: No changes made to the State Plan**

The 1,500 individuals expected to be served during the year would not all be served concurrently. As defined in 34 CFR § 361.5(c)(15) and 29 U.S.C. 705(11), in the VR program supported employment services are only provided after hire. Therefore, those who require that service would only receive it long enough to reach and maintain stability on the job for sufficient time to achieve a successful employment outcome. Of the 1,500 individuals expected to be served, only a subset would be receiving the service at any given time, meaning the average caseload size would be smaller than 28.3.

VR job coaches are trained in providing supported employment services to VR consumers. VR does contract with providers and CRPs for other services such as Pre-Employment Transition Services.

SCVRD does not exclude individuals from services. The agency serves all who apply and meet eligibility criteria.

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**Entity/Organization:** SC Department of Disabilities and Special Needs (7 of 8)

**Person Commenting:** Janet Priest

**Comment:**

**Title IV** - For many states, people with the disabling conditions that would make them DDSN-eligible are, by virtue of their DDSN-eligibility, considered also eligible for VR services (without additional eligibility determination). Most people who are DDSN-eligible would also be considered to at least have a significant disability and many would also be considered to have a most significant disability. As previously stated, for 95.9% of the 268 known referrals to VR made on behalf of DDSN-eligible people in SFY23, there were no services and/or no successful outcomes.

VR has indicated its goal to support 1500 job seekers in supported employment in the next fiscal year. If only ten percent (10%) of DDSN-eligible working age adults were referred to VR next year, 2,180 DDSN-eligible people would be referred. This number would exclude all other job seekers (e.g., those with mental illness, learning disabilities, ADD/ADHD). The 10% (2,180) of DDSN-eligible working age adults is more than the total number of job seekers VR intends to support. Because the number is so great, and VR is currently unwilling to utilize CRPs, it is unlikely that, absent order of selection, DDSN-eligible people, who are those with most significant disabilities, will receive any services from VR.

I. Interagency cooperation with other agencies Pg. 184.

3. Non-educational agencies serving out-of-school youth:

The SC WIOA State Plan 2024-2027 states, “The non-educational agencies that SCVRD partners with includes...SC Department of Disabilities and Special Needs.” As stated, DDSN currently has no cooperative agreement with VR. Understanding the importance of sound transition planning for youth exiting school, DDSN has employed South Carolina

certified educators as transition coordinators. A primary role of these DDSN employees is to increase referrals to VR with the goal of improving employment outcomes for DDSN-eligible young adults exiting secondary education.

6. State agency responsible for providing services for individuals with developmental disabilities:

DDSN is the agency, established by law, in the state as having authority over all of the state's services and programs in support of people with the following life-long disabling conditions:

- Intellectual Disabilities/Related Disabilities
- Autism Spectrum Disorder
- Traumatic Brain Injury /Spinal Cord Injury /Similar Disability

The SC WIOA State Plan states, "SCVRD continues to work with DDSN to ensure individuals are provided with opportunities related to competitive integrated employment." VR and DDSN do not now, and have not for several years had, a cooperative agreement. DDSN's data regarding those known to have been referred to VR during SFY23 shows that 95.9% of those referred were not provided with opportunities related to competitive integrated employment. DDSN endorses the findings of the CSNA which clearly indicates that people with intellectual and related disabilities are unserved/underserved.

**Response: No changes made to the State Plan**

Job Readiness Training (JRT) is a service that is offered but is not a requirement. All VR services are individualized. Consumers are referred to the centers based on their individualized needs, informed choice, and to enhance the consumers' job readiness to the point they can successfully achieve competitive, integrated employment. VR Counselors work closely with consumers to determine the appropriate vocational objective, training, and VR service needs prior to job placement activities.

SCVRD does not anticipate 10% of DDSN-eligible working age people being referred in a single year. Historical referral counts for both DDSN-eligible individuals and the working age disability community at large suggest a much smaller proportion. DDSN's own data cited in these public comments indicate that only 1.2% were referred in the most recent SFY. Additionally, recent hiring of additional job coaches has substantially increased SCVRD's capacity to meet an increase in demand for supported employment services.

Although there is no formal agreement in place between DDSN and SCVRD, partnering is still occurring. SCVRD has counselors assigned to every public high school in the state, and these counselors interact with the DDSN Transition Coordinators who help to "increase referrals to VR," including as part of local interagency transition capacity building teams. As mentioned previously, one of the DDSN Transition Coordinators participated in a focus group for the SCVRD CSNA.

While DDSN has data regarding the number of referrals they are aware of being sent by their contracted providers to VR, DDSN does not have data pertaining to the VR services provided to those individuals or their outcomes. Those data would have to come from VR service records. And, as noted previously, there is no data sharing in place between the agencies. Therefore, DDSN would have no way of knowing about service provision or outcomes except through secondhand accounts from case managers relaying information received from a VR counselor. That is a very unreliable method of data collection and should not be considered more accurate than service provision and outcomes data from the VR case management system. Based on average case duration, it is likely that a large proportion of those referred in SFY 2023 still have an open VR case.

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**Entity/Organization:** SC Department of Disabilities and Special Needs (8 of 8)      **Person Commenting:** Janet Priest

*Comment:*

**Title IV: SCCB** - Program-Specific Requirements for State Vocational Rehabilitation Services Program-Blind. Pg. 193

(b) Comprehensive Statewide Needs Assessment:

The SC WIOA State Plan states, "...SCCB will also continue exploring providers to include DDSN...as a start to build a network of qualified SCCB providers for these services." DDSN welcomes the opportunity but has not, to date, been contacted.

I. Interagency Cooperation with Other Agencies Pg. 215

6. State agency responsible for providing services for individuals with developmental disabilities:

The SC WIOA State Plan states, "[SCCB partners with the South Carolina Department of Disabilities and Special Needs (DDSN) to avoid duplication of services increase coordination of employment services provided to the shared consumer populations and to enhance Supported Employment programs.]" DDSN does not have a cooperative agreement with VR or with SCCB. DDSN is not aware of the identification of "shared consumer populations" and is unaware of SCCB's partnership.

Respectfully submitted,

/signed/

Janet Brock Priest

Associate State Director – Operations

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

DDSN welcomes the opportunity but has not, to date, been contacted.

DDSN does not have a cooperative agreement with VR or with SCCB. DDSN is not aware of the identification of "shared consumer populations" and is unaware of SCCB's partnership.

For the second comment, we adjusted the response to say, "SCCB will seek to partner with the South Carolina Department of Disabilities and Special Needs (DDSN) to avoid duplication of services, increase coordination of employment services provided to the shared consumer populations, and to enhance Supported Employment programs."

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**Entity/Organization:** SC Works – WorkLink

**Person Commenting:** Sharon Crite

*Comment:*

**Title I** - An increase in program formula allocations for the local areas for all programs (Adult, DW, Youth) is urgently needed. If possible, all funding allocated in the initial NFA would be appreciated. If supplemental grants are utilized ensure there is supplemental funding for all programs.

**General Comments** - Our local areas are in desperate need of funding to maintain levels of service to our participants.

**Response: No changes made to the State Plan**

The Department of Labor (DOL) generally issues a Training and Employment Guidance Letter (TEGL) each spring regarding state Adult, Dislocated Worker, and Youth funding allotments for the coming program year. Each state then uses the allotment to calculate Local Workforce Development Area allocations using data from mass layoffs, average insured unemployment by county, Areas of Substantial Unemployment (ASU), declining industries, farmer/rancher information, and long-term unemployment. Once the allocation formula has been completed, South Carolina is unable to issue a Notice of Fund Authorization to the LWDA's until the funding becomes available from DOL.

From program year 2017 to 2023, South Carolina's total Adult, Dislocated Worker, and Youth allocation has decreased 34.4%. In program year 2018, the state began to retain only 15% of Dislocated Worker funding for statewide rapid response in lieu of the previously used 25%. South Carolina's allocation formula has not changed since 2018 and the formula is included in the WIOA state plan available here.

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**Entity/Organization:** WorkLink

**Person Commenting:** Wendy Graham

*Comment:*

**Title I** – We need more allocations. We need all the funding at one time.

**General Comments** - We need more funds to provide the level of services required for our area.

*Response:* **No changes made to the State Plan**

The Department of Labor (DOL) generally issues a Training and Employment Guidance Letter (TEGL) each spring regarding state Adult, Dislocated Worker, and Youth funding allotments for the coming program year. Each state then uses the allotment to calculate Local Workforce Development Area allocations using data from mass layoffs, average insured unemployment by county, Areas of Substantial Unemployment (ASU), declining industries, farmer/rancher information, and long-term unemployment. Once the allocation formula has been completed, South Carolina is unable to issue a Notice of Fund Authorization to the LWDA's until the funding becomes available from DOL.

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**Entity/Organization:** *University of South Carolina School of Medicine, Center for Disability Resources (UCEDD) (1 of 2)*

**Person Commenting:** *David Rotholz*

*Comment:*

**Title IV** - March 5, 2024

The Center for Disability Resources at the USC School of Medicine is the University Center of Excellence in Developmental Disabilities for South Carolina (UCEDD). Our collaborations with local, state and federal agencies and organizations that support people with developmental and related disabilities include a focus on training, technical assistance, research and information dissemination to enhance the well-being and quality of life for people with disabilities and their families. This implies the imperative that individuals with Intellectual and Developmental Disabilities (IDD) be fully included in the community of their choice, including the right to meaningful and competitive integrated employment.

We welcome the opportunity to provide input regarding the South Carolina WIOA State Plan (2024-2027). It is important to note that it is highly unusual for us to provide negative comments, especially for public input. However, given the important impact that appropriate services from SC Vocational Rehabilitation can and should have for South Carolinians with Intellectual and Related Disabilities, it is imperative that we provide the honest input that this WIOA plan deserves.

We are aware of and appreciate the federal mandate for community-based, individualized service provision at 34 CFR 361.5(c)(5)(ii)(E) that states that "to the maximum extent possible, relies on information obtained from experiences in integrated employment settings in the community and in other integrated community settings". However, it is not clear how SC Vocational Rehabilitation (VR) can be compliant with this mandate when it relies on VR operated work training centers and VR operated facility-based settings instead of community settings in determining what VR services are needed for employment of people with Intellectual and Related Disabilities.

It is quite troubling that while 49 other state VR agencies contract with local provider organizations that have the specialized skills and experience in finding and supporting employment for people with IDD and related disabilities, the South Carolina VR agency does not. It is helpful that the SC Department of Disabilities & Special Needs (DDSN) has a policy directive that enables it to pay its network of trained employment services providers to step in for DDSN-eligible people who are not served or not successfully served by SC VR. We share the significant disappointment expressed by SC DDSN that while SC VR does not purchase services from community providers, it does take credit for post-closure outcomes when the DDSN provider network provided support or customized employment services that resulted in the successful employment outcome.

**Response: No changes made to the State Plan**

There are no written or unwritten requirements that any VR participant attend and participate in services at a training center. Consumers are referred to the centers based on their individualized needs and informed choice to enhance their skills, including soft skills that employers in SC have indicated are in demand. Individuals may spend time in the training center as part of their vocational assessment to identify strengths and individualized solutions to address functional limitations, as well as to help determine a vocational objective.

Community-based experiences are always available, according to the consumers' individualized VR services needs. This includes career exploration and job tryouts in integrated settings.

SCVRD has a long history of investing in infrastructure, including personnel, to provide services in-house. This model allows for more consistency across locations and mitigates the risk of being unable to find qualified providers to meet the VR service needs in all locations of the state.

The Workforce Innovation and Opportunity Act (WIOA) encourages co-enrollment of VR program participants in partners' programs so that individuals receive all appropriate supports from complementary services. The outcomes that SCVRD reports to its Federal partners (at case closure and post-exit) are strictly defined for the VR program, and SCVRD adheres to the same reporting specifications as all VR programs nationally. Data collection captures whether the VR program was involved in direct placement activities or not, regardless of the outcome of the case.

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**Entity/Organization:** *University of South Carolina School of Medicine, Center for Disability Resources (UCEDD) (2 of 2)*

**Person Commenting:** *David Rotholz*

*Comments:*

**General Comments - Continued from section on VR:**

A notable concern with the draft of the South Carolina WIOA State Plan is the disregard of the input VR received in its Comprehensive State Needs Assessment. That input indicated that people with IDD, including those with the most severe disabilities, are unserved/underserved by VR. It appears that VR is disregarding this public input reflected in the CSNA because "no data have been provided to substantiate the claims". First of all, these are not "claims" but rather are the solicited public input required in a CSNA. Secondly, having provided input for the CSNA, we recall that the format used by VR for this assessment asked for narrative comments and feedback, not data. Therefore, it is not surprising that data were not provided for the CSNA. The detailed public input provided 2/28/24 for the South Carolina WIOA State Plan by the SC DDSN does include data from that state agency. Those data portray an abysmal outcome for people with IDD by VR. According to the DDSN SFY 23 data, 268 DDSN-eligible people were known to have been referred to VR (others may have been referred but unknown by DDSN). Of those 268 people, only 11 achieved a successful employment outcome. The other 257 did not. Clearly this is a situation that needs major attention and improvement.

An important related issue is the question of what precise definition and diagnostic process is used by VR to label someone as having Intellectual Disability or Autism Spectrum Disorder (ASD). These diagnostic labels have very specific, nationally determined criteria; ones that are reflected in the DDSN data and in their public comment document. Since it is not clear how VR determines if an applicant has IDD or ASD, this may be a source of discrepancy underlying certain assertions in the WIOA plan and its data.

Lastly, the SC WIOA State Plan notes that a memorandum of understanding (MOU) "will be executed" with SC DDSN. However, there is no current or recent cooperative agreement with DDSN, and it appears that efforts to develop such an agreement have been stalled for years.

While it's clear that we express many concerns with the SC WIOA plan, our hope is that they will be addressed satisfactorily for the benefit of South Carolinians with Intellectual and Related Disabilities.

Submitted with all due respect,

David Rotholz  
David A. Rotholz, Ph.D.  
Executive Director

**Response: No changes made to the State Plan**

There was no expectation that respondents who provided input for the CSNA would provide data. However, the input received must be compared with available data to determine how much weight to give to any particular perspective. The CSNA pointed out that the data available do not substantiate the claim that people with I/DD are underserved. People with Intellectual Disabilities (1,424) and Autism Spectrum Disorders (1,597) were well represented among SFY 2023 consumers served, constituting a combined 13.9% of the total.

SCVRD has a detailed eligibility policy that outlines the documentation requirements for eligibility determinations. To ensure timely assessment counselor observation may be used in some cases. However, for individuals with Autism or Intellectual Disabilities, SCVRD collects records from qualified facilities or providers familiar with diagnosing or treating these conditions. SCVRD requests specific data from the qualified medical or psychiatric professionals to identify the disability and specific issues that may affect an individual's ability to work and participate in SCVRD services. SCVRD staff are trained to not assume an individual is or is not eligible for DDSN services. When appropriate, Trial Work Experiences (TWE) can be conducted. Trial work experiences are an exploration of the individual's abilities, capabilities, and capacity to perform in real work situations. They are to determine whether there is clear and convincing evidence to support a determination that due to the severity of the individual's disability, they cannot benefit from vocational rehabilitation services in terms of an employment outcome. SCVRD staff are trained to assess the consumer or applicant holistically, and if it is possible that services through DDSN could also be beneficial for the individual, they are trained to refer the consumer/applicant and their support system to the process for applying for DDSN services and the benefits of being jointly served by each agency.

DDSN does not have data pertaining to the VR services provided to the individuals that their providers have referred to SCVRD or the outcomes of those individuals whose VR cases have closed to-date. Those data would have to come from VR service records. And, as noted previously, there is no data sharing in place between SCVRD and DDSN. Therefore, DDSN would have no way of knowing about service provision or outcomes except through secondhand accounts from case managers relaying information received from a VR counselor. That is a very unreliable method of data collection and should not be considered more accurate than service provision and outcomes data from the VR case management system. Based on average case duration, it is likely that a large proportion of those cited by DDSN in their public comments, who were referred in SFY 2023, still have an open VR case. So, it would be premature to make judgments about the success rate for that segment of the I/DD population served.

SCVRD has attempted repeatedly to negotiate a cooperative agreement with multiple DDSN points of contact. Several meetings were scheduled in 2023, with an in-person meeting that occurred in the spring. However, the MOU was not executed.

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**Entity/Organization:** *Upstate Workforce Board*

**Person Commenting:** *Ann Angermeier*

*Comment:*

**Section III: Operational Planning Elements** - A concern we have begins on page 60 and goes through page 66 of the state plan. The Greater Upstate Senior Business Services Consultant is a duplication of services already being performed. Why is this specific to SCDEW business services when the one stop standards require a holistic approach of SC Works business services? Placing Wagner-Peyser work in a silo which limits business outreach to only DEW solutions and not system solutions involving Title I WIOA services (OJT, IWT, and the many other system partner business services) is not conducive with the intention of the SC Works system. The SC Works system is not a DEW system, it is a comprehensive group of partners. The WIOA clearly places the board appointed Business Services Lead in control of



coordination of the business services for the local area. The state plan goes against the intent of WIOA in this area. The WIOA regulations Subpart C – Local Workforce Boards - clearly states the vision and purpose of the local workforce boards. We also have Link Upstate which is our 14-county region that consists of four workforce boards and this group completed its regional plan together for the state. This group meets quarterly so we have regional efforts in place and the four Workforce Board Directors lead this effort. We have often heard the term DEW centers mentioned by DEW staff in reference to the SC Works centers. These centers are not DEW centers. They house several partners.

The law states that the vision for the local workforce development board is to serve as the strategic leader and convener of local workforce development system stakeholders. There is much more detail in Subpart C of WIOA regulations. Each workforce board has a one stop committee that addresses issues that arise in the SC Works System. Having consistent policies is imperative to ensure quality and professional services. Problems occur when even one partner does not follow the intent of WIOA and the one stop standards.

Our Business Services Lead already has business team meetings that include the partners in the system. DEW Regional Senior Business Consultants should attend the meetings that the local Workforce Boards' Business Services Leads have in each area. Our Business Services Lead also engages with ReadySC on new prospects/new industry. We do not need several individuals doing the same work.

We feel this will be the same case with the rural initiative staff. There will be more duplication of services. The Upstate Workforce Board has a hired a consultant that conducts business surveys of employers. Once again, the plan reads that DEW will also duplicate this.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

Removed the strategy action item to 'Implementation of the Senior Business Consultant model that will manage service delivery to key account and foster regional collaboration'.

The Senior Business Service Consultants support SC Works Certification Standards by improving communication with the Business Services Lead and Integrated Business Services Team. By establishing a single point of contact for DEW across regional boundaries, the Business Services Lead is no longer required to contact multiple DEW Staff for major projects, thus streamlining coordination efforts and enhancing mutual understanding of program goals.

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**Entity/Organization:** *Colleton Adult Learning Center (1 of 2)* **Person Commenting:** *Chris J. Horvath*

*Comment:*

**Section II: Strategic Elements -**

p. 53 final paragraph, Adult Education providers deliver adult education and literacy activities, including career pathways, Integrated Education and Training establishing a robust partnership with the SC Technical College System, College and Career Navigation (Global Career Development Facilitator) services, Northstar Digital Literacy, WIN Courseware, WIN Academic testing, WIN soft skills assessment, South Carolina High School Diploma study and completion including GED preparation and multiple GED testing centers in every Workforce area, through 47 school district programs with over 80 physical locations that are located in every SC Workforce Area in an effort to eliminate the transportation barrier of many adult learners.

**Section III: Operational Planning Elements -**

p.64 paragraph 4, The Adult Education Programs continue to develop and implementing Integrated Education and Training and Training Career Pathways designed with each Local Workforce Boards designed to meet local and regional Labor Market Information and in partnership with the SC Technical College System and SC approved workforce training providers. This service is overed within every SC Workforce Area, county and school district in the state addressing the transportation barrier and building a bridge to in demand to credentials that directly leads to employment. Integrated Education and Training provides a concurrent opportunity for the adult learner to earn a South Carolina High School Diploma or pass the Official GED tests and earn a in demand credential.

p.66 Strategy 3.2, paragraph 2, ...the State will continue promotion of Connection Points as a network of partners and a physical location where job seekers can access unemployment and employment services and digital literacy instruction. In addition to SC Works comprehensive and satellite centers and the listed connection points, SC Adult Education providers participate in SC Works 101 training and provide access at over 80 additional adult education centers and satellite centers in every SC Workforce Area, county and school district. Multiple adult education providers loan devices to adult learners to assist with wrap around service to assist with academic, employment skills, post-secondary training and soft skills that lead to competitive employment.

p.69, paragraph 5, add: Additional reports such as the i6R documents local adult education providers interaction with local employers needs and the identification of needed career pathways that result in skilled employees for local business and industry across the state.

p.74, paragraphs 2 and 3, There are 79 school districts in South Carolina. Adult Education has over 80 locations located within every SC Workforce Area and county. Every Adult Education provider offers career pathways and Integrated Education and Training that prepares adult learners for employment in in demand employment sectors.

...afford opportunities for students to obtain a HSED, HSD, a career readiness certificate all adult learners age 17 and older to earn a South Carolina High School Diploma or preparation to pass the GED and take the Official GED Tests to earn the SC High School Equivalency Diploma. recognized by the SC Technical College System at all 16 locations and the SC Commission on Higher Education. Additionally, adult learners are provided instruction to prepare for the WIN academic tests and earn a South Carolina Wore Ready Credential, and the WIN Soft Skills Credential.

And key staff to support initiatives offered by the program, to include Integrated Education and Training in collaboration with the SC Technical College System and workforce approved providers for post-secondary training that leads directly to employment in priority areas identified by the local workforce board and the SC Workforce Area.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg. 53, 54: C. State Workforce Development Capacity
  - Added: To help eliminate some transportation barriers for many adult learners, adult education and literacy activities are delivered through 51 Adult Education Programs (47 school-district programs, which includes the Palmetto Unified School District of SC, and four community-based organizations) covering more than 150 physical locations. The adult education and literacy activities include South Carolina High School Diploma and High School Equivalency study and completion for out of school youth 17 to 21 years old, and adults 22 and above for all 79 school districts. Moreover, to support high school equivalency preparation, there are multiple GED Tests centers in every Workforce area. Industry-recognized credential career pathway development and Integrated Education and Training collaboration with the SC Technical College System and other post-secondary training providers, College and Career Navigation (Global Career Development Facilitator) wrap-around services, Northstar Digital Literacy training, WIN Courseware, WIN Academic testing, WIN soft skills assessment, workforce preparation activities, and Skills Upgrade classes are all part of adult education literacy activities. Skills Upgrade classes are offered to individuals who already have a high school diploma or a higher education level and need to improve math, reading, English, writing, or digital literacy skills.
  - Edited: Programs offer flexible schedules to meet the demanding schedules of individuals seeking services. Through Workplace Literacy, Adult Education Providers seeks to serve employers directly by providing customized academic and workforce preparation instruction as determined by specific employer need.
  
- Pg. 65: Strategy 2.1 Increase the percentage of participants that obtain high-value credentials.
  - Added/Edited: The completion of secondary diplomas is a critical part of the workforce development process. Adult Education Programs provide the opportunity for out of school youth 17 to 21 years old and adult learners 22 and older to earn the South Carolina High School Diploma or the High School Equivalency Diploma. Most post-secondary education or training programs require the secondary

diploma as a prerequisite to start industry recognized occupational training, or work towards an associate or bachelor's degree.

- Adult Education Programs continue to develop and implement Integrated Education and Training (IET) Career Pathways that are developed with the SC Technical College System and other workforce training providers to meet local and regional workforce area needs. Concurrently with IET classes, adult education programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or GEDs, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.
- Pg.76: Added to State Program and State Board Overview A. State Agency Organization
  - The Office of Adult Education is contained within the SCDE under the Division of College and Career Readiness and is managed by the position of State Director of Adult Education.

Technical support, professional development, and compliance monitoring are provided by Education Associates within the Office of Adult Education. There are 79 school districts in South Carolina. Fifty-one Adult Education Programs with more than 150 physical locations provide adult education and literacy activities in all 79 school districts.

Adult education programs are voluntary and afford opportunities for adult learners 17 and older to obtain a high school diploma, GED, a career readiness certificate, participate in English as a second language classes (ESL), and family literacy (FL). Some adults enroll in Skills Upgrade classes to improve their basic literacy and/or numeracy skills. Integrated education and training career pathways can occur concurrently with these options. Additionally, adult learners are provided instruction to prepare for the WIN academic tests and earn a South Carolina Work Ready Credential, and the WIN Soft Skills Credential.

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**Entity/Organization:** *Colleton Adult Learning Center (2 of 2)*

**Person Commenting:** *Chris J. Horvath*

*Comment:*

**Section IV: Coordination with State Plan Programs -**

Section VI, p. 8, Training Program Requirements, states: A secondary school diploma or its equivalent if such activities are provided in combination with other training services; QUESTION: SC Adult Education providers in every county and workforce area provide instruction for the SC High School Diploma and award South Carolina High School Diplomas through their local school district and high school for all learners age 17 and older as well as GED preparation and testing. SC High School Diploma and GED opportunities are offered concurrently with Integrated Education and Training in partnership with the SC Technical College System and approved workforce providers. Why is the above statement needed if these services are provided by every adult education provider in South Carolina?

**Response: No changes made to the State Plan**

The language included in our plan comes from Training and Employment Guidance Letter (TEGL) 08-19, Attachment I – Requirements for Training Providers, Program Eligibility, and the State Eligible Training Provider List in WIOA. Additionally, Adult Education is not the only provider of Adult Literacy services in South Carolina. Turning Pages is an example of another provider.

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**Entity/Organization:** *Bamberg/Barnwell (1 of 2)*

**Person Commenting:** *Joye Hallman*

*Comment:*

**Section II: Strategic Elements -**

Pages 35, 39: The section does not adequately describe how adult education programs address skill gaps in South Carolina's workforce system. Today's economy requires a workforce that is not only skilled but committed to continuous learning. Adult education programs are uniquely equipped to not only provide foundational skills education but also to equip adults with the skills necessary to thrive in a rapidly evolving job market. Moreover, high school credentials (high school diploma and high school equivalency diplomas) are often prerequisites for accessing higher education programs and specialized occupational training, Adults enroll in adult education programs at all skill levels, basic, intermediate,

and advanced. Adult education programs offer opportunities for upskilling and reskilling that meet the evolving needs of community and industries. Adult education programs are equipped to strengthen the workforce pipeline through targeted education, workforce preparation, and soft skills training. Adult education programs develop pathways that offer a seamless transition from education to employment, ensuring that learners can quickly move into in-demand jobs.

Page 53 C: This section does not adequately describe adult education programs' capacity to provide workforce development activities. Please consider including the information below.

Adult education offers high school diploma classes to youth and adults over the age of 21 along with GED, workforce preparation training, South Carolina adult education programs serve all 79 school districts in the state including Palmetto United School District. Programs offer morning, evening, and weekend classes in 150 physical locations in the state including rural areas to meet the needs of individuals seeking adult education services. South Carolina adult education programs offer specialized instruction for high-demand industries through Integrated Education Training (IET) Programs, career readiness programs, and workplace literacy programs. Students can earn a high school credential (GED or High School Diploma) and a national, state, and/or industry recognized certification simultaneously. Adult education programs provide an entry-point into job training and employment for out of school youth and adults each year by serving students with high school diploma, high school equivalency, industry-recognized training and occupational credentials and wrap around services.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.39, 40 Michael R. King added under Adult Education: Family Literacy
  - Family Literacy
    - The purpose of Family Literacy is to provide an initiative that interrupts generational poverty and low literacy by equipping adult students who are parents or guardians and their children for lifelong learning and economic stability. Family Literacy provides adult education students who are parents or guardians with opportunities to improve their academic skills and use those skills to enhance the literacy skills of their children. (Formatted: Normal, No bullets or numbering)
    - Family Literacy is an extension of services that may be offered by local adult education programs. One goal is to remove childcare barriers experienced by an enrolled student who is a parent or guardian and to increase the student's ability to participate fully in the adult education program. (Formatted: Widow/Orphan Control)
    - Family Literacy program participation must support the interwoven goals of adult education and family literacy for adults to obtain a high school equivalency diploma (HSED), high school diploma (HSD), enter employment, retain employment, transition to post-secondary education and training, choose a career pathway, and obtain the educational skills necessary to become full partners in the educational development of their children.
    - Family Literacy programs are required to include the four components of Family Literacy: Adult Education, Parent Education, Interactive Literacy Activities, and Early Care and Education. The initiative must provide a broad array of services for the student to not only gain educational skills and earn a high school credential but also gain the skills to become the primary teacher for their children and prepare both the parent and the child for success in later life. The components of a Family Literacy program are:
      1. Adult Literacy (i.e., Adult Education) with the goal of obtaining a high school diploma, high school equivalent diploma, career readiness certificate, career pathway, postsecondary education, or the military;
      2. Training for Parents (i.e., Parent Education), guardians, or family members regarding how to be the primary teacher for their children and full partners in the education of their children;
      3. Educational Activities between Parent and Child (i.e., Interactive Literacy Activities (ILA)) between parents or family members and their children. ILA must be supported by

partnerships such as with the local school district, Head Start, Early Head Start, First Steps to School Readiness, and private partnerships;

4. Early Childhood Services (i.e., Early Care and Education (ECE)) is age-appropriate education to prepare children for success in school and life experiences. These services may be supported by partnerships such as the local school district, Head Start, Early Head Start, First Steps to School Readiness and/or private partnerships.

- Family literacy through Adult Education Programs can be found in 15 locations, at least one in every workforce area. (Formatted: Normal, No bullets or numbering)

- Pg.40: Michael R. King added and edited the Integrated English and Literacy portion:

- Integrated English and Literacy and Civics Education

- The Integrated English Literacy/Civics Education (IEL/CE) program is authorized by Title II (Adult Education) of the Workforce Innovation and Opportunity Act of 2014 (WIOA).

- Secondary Diploma Completion

- Out of school youth 17 to 21 years old and adult learners 22 and older enroll in adult education programs at all academic skill levels (adult basic, adult intermediate, and adult secondary). To assist with secondary diploma completion, adult education providers offer flexible schedules for high school diploma credit classes and high school equivalency diploma preparation classes to youth and adult learners across all workforce areas. These secondary diploma completion classes include workforce preparation activities like digital literacy and other soft skills training. Moreover, secondary diplomas are often prerequisites for accessing higher education programs and specialized industry recognized occupational training.

- Skills Upgrade

- Adult education programs offer opportunities for upskilling and reskilling that meet the evolving needs of community and industries in the areas of math, reading, writing, English as a second language, and digital literacy training. Programs are equipped to strengthen the workforce pipeline through targeted education, workforce preparation, and soft skills training.

- Pg. 53, 54: C. State Workforce Development Capacity

- Added: To help eliminate some transportation barriers for many adult learners, adult education and literacy activities are delivered through 51 Adult Education Programs (47 school-district programs, which includes the Palmetto Unified School District of SC, and four community-based organizations) covering more than 150 physical locations. The adult education and literacy activities include South Carolina High School Diploma and High School Equivalency study and completion for out of school youth 17 to 21 years old, and adults 22 and above for all 79 school districts. Moreover, to support high school equivalency preparation, there are multiple GED Tests centers in every Workforce area. Industry-recognized credential career pathway development and Integrated Education and Training collaboration with the SC Technical College System and other post-secondary training providers, College and Career Navigation (Global Career Development Facilitator) wrap-around services, Northstar Digital Literacy training, WIN Courseware, WIN Academic testing, WIN soft skills assessment, workforce preparation activities, and Skills Upgrade classes are all part of adult education literacy activities. Skills Upgrade classes are offered to individuals who already have a high school diploma or a higher education level and need to improve math, reading, English, writing, or digital literacy skills.

- Edited: Programs offer flexible schedules to meet the demanding schedules of individuals seeking services. Through Workplace Literacy, Adult Education Providers seeks to serve employers directly by providing customized academic and workforce preparation instruction as determined by specific employer need.

*Comment:*

**Section III: Operational Planning Elements -**

Page 59, 65: State Strategy: Objective 1: Prepare job seekers for high-wage, high-demand, and high-mobility (4H) occupations through relevant training and skills acquisition, and match job seekers to open employer positions. Strategy 2.1 Increase the percentage of participants that obtain “high-value credentials”.

This section refers only to increasing high-value credentials for participants. How is the term “high-value credential” defined in the state’s WIOA plan? High value credentials typically refer to certifications, licenses, or credentials that hold value in the labor market and are recognized, endorsed by industry stakeholders, and are typically aligned with specific occupations or industries. High school diploma and high school equivalency diploma should also be included in this section.

Increasing the percentage of participants that obtain high school diplomas and high school equivalency credentials (such as the GED) should be included specifically in the state's plan. These credentials support individuals in their efforts to improve their education, skills, and employment prospects, ultimately strengthening our workforce and economy.

Excluding high school diplomas and equivalency credentials from the state's strategy in the WIOA plan overlooks a significant segment of the population served by WIOA striving to improve their skills and prospects. Many individuals who have not completed high school face barriers to employment and economic mobility. By incorporating these credentials into the state's plan, we can ensure that resources and support are available to assist these individuals in obtaining the education and training they need to succeed in today's competitive job market.

Page 64: Partner Engagement with Educational Institutions and other Education and Training Providers

This section does not adequately describe how adult education programs can address the needs of the workforce system through the programs they offer. Please elaborate on what adult education programs do to address the needs of the workforce.

Adult education programs play a pivotal role in addressing skill gaps and building a workforce that is competitive, adaptable, and prepared for the challenges of the future.

Adult education programs serve a diverse population, including individuals with varying educational backgrounds, language proficiency levels, and learning needs. These programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or equivalency credentials, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.

Access to education and training is a key driver of economic mobility. There are 150 physical locations including satellite sites across the state including rural areas. Adult education programs help individuals improve their educational credentials, acquire in-demand skills, and increase their earning potential. By enabling individuals to obtain higher-paying jobs and access career pathways with growth opportunities, adult education programs contribute to reducing poverty, narrowing income inequality, and helping economic prosperity within communities.

Adult education programs collaborate closely with employers, industry partners, community organizations, and other stakeholders to align education and training programs with the needs of the local labor market. By creating strong partnerships with employers and industry associations, adult education programs ensure their curriculum is relevant, responsive, and aligned with industry demands, improving the employability of program participants.

Adult education programs are critical partners within the SC workforce system because they address skills gaps, serve diverse learners, promote lifelong learning, support economic mobility, and strengthen workforce partnerships.

*Section IV: Coordination with State Plan Programs - (Section III: Operational Planning Elements)*

Section 3 Continued: Page 71 and 74: State Program and State Overview A. State-Agency Organization: This section does not adequately describe all the programs and services that adult education offers, please include the following in the overview of South Carolina Department of Education, Office of Adult Education.

The Office of Adult Education offers a wide range of comprehensive programs designed to meet the diverse needs of adult learners across the state. These programs include adult basic education (ABE), high school equivalency (HSE) preparation, English language acquisition (ESL), workforce readiness, digital literacy training, soft skills training, and career pathway development. Adult education programs offer adult high school diploma classes for adults over the age of 21.

The Office of Adult Education collaborates closely with various stakeholders, including SC Technical College System, employers, workforce development boards, nonprofit organizations, and other state agencies. These partnerships facilitate the alignment of adult education programs with local workforce needs, industry demands, and economic development priorities. By leveraging the expertise and resources of partner organizations, the office maximizes its impact and promotes seamless transitions for adult learners into employment or further education.

Recognizing the importance of innovative instructional approaches in adult education, the Office of Adult Education utilizes evidence-based practices and instructional practices to improve learning outcomes. Whether through blended learning models, contextualized instruction, technology integration, or competency-based education, the office ensures that adult learners receive high-quality instruction tailored to their unique learning styles and needs.

The Office of Adult Education places a strong emphasis on helping adult learners attain education and training that are aligned with local workforce demands and industry requirements. By offering targeted and education training programs, test preparation assistance, and support services, the office enables individuals to obtain industry-recognized certifications and credentials that enhance their employability and earning potential.

Committed to continuous improvement and accountability, the Office of Adult Education regularly assesses program effectiveness, evaluates learner outcomes, and solicits feedback from stakeholders. Through data-driven decision-making and performance monitoring, the office identifies areas for enhancement, implements evidence-based strategies, and ensures that adult education programs remain responsive to evolving workforce needs and learner aspirations.

South Carolina Department of Education's Office of Adult Education exemplifies a commitment to excellence, equity, and empowerment in adult education. Through its comprehensive programs, collaborative partnerships, innovative instructional approaches, focus on credentials, and dedication to continuous improvement, the office plays a vital role in advancing the state's workforce development goals and promoting economic prosperity for all South Carolinians.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.59, 65: While the definition of “high-value credentials” provided in the comment is generally acceptable, South Carolina has not defined high-wage, high-demand, high-mobility, high-retention (4H) occupations or high-value credentials. Implementation of this strategy will require the state to create a consistent definition or identify a set of criteria against which programs can use to evaluate credentials. It is widely accepted that a high school diploma or equivalency can increase access to employment and postsecondary education opportunities, as well as increase earnings. As the plan is implemented a definition is crafted, the state will consider the importance of categorizing a high school credential as a credential of value.
- Pg. 65: Strategy 2.1 Increase the percentage of participants that obtain high-value credentials.
  - Added/Edited: The completion of secondary diplomas is a critical part of the workforce development process. Adult Education Programs provide the opportunity for out of school youth 17 to 21 years old and adult learners 22 and older to earn the South Carolina High School Diploma or the High School

Equivalency Diploma. Most post-secondary education or training programs require the secondary diploma as a prerequisite to start industry recognized occupational training, or work towards an associate or bachelor's degree.

- Adult Education Programs continue to develop and implement Integrated Education and Training (IET) Career Pathways that are developed with the SC Technical College System and other workforce training providers to meet local and regional workforce area needs. Concurrently with IET classes, adult education programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or GEDs, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.
- Pg.71: Added/Edited to Adult Education and Family Literacy Act Program:
  - The OAE has access to all local program information through LACES, and each local program has the capability to run the federally required reports on only their program. At the state level, the OAE can run these reports on all eligible providers. Additionally, the OAE collects reports such as the WIOA Indicator Six (i6R) employer reports that documents local adult education providers interaction with local employers, and the College and Career Navigation report that collects all career and wrap-around services delivered to students.
- Pg.76: Added to State Program and State Board Overview A. State Agency Organization
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**Entity/Organization:** *Bamberg/Barnwell Adult Education (1 of 2)*

**Person Commenting:** *Gracelynn Gleaton*

*Comment:*

**Section II: Strategic Elements -**

(Page 35, 39) Addressing Skill Gaps: The section does not adequately describe how adult education programs address skill gaps in South Carolina's workforce system. Today's economy requires a workforce that is not only skilled but committed to continuous learning. Adult education programs are uniquely equipped to not only provide foundational skills education but also to equip adults with the skills necessary to thrive in a rapidly evolving job market. Moreover, high school credentials (high school diploma and high school equivalency diplomas) are often prerequisites for accessing higher education programs and specialized occupational training. Adults enroll in adult education programs at all skill levels, basic, intermediate, and advanced. Adult education programs offer opportunities for upskilling and reskilling that meet the evolving needs of community and industries. Adult education programs are equipped to strengthen the workforce pipeline through targeted education, workforce preparation, and soft skills training. Adult education programs develop pathways that offer a seamless transition from education to employment, ensuring that learners can quickly move into in-demand jobs.



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**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.39, 40 Michael R. King added under Adult Education: Family Literacy
  - Family Literacy
    - The purpose of Family Literacy is to provide an initiative that interrupts generational poverty and low literacy by equipping adult students who are parents or guardians and their children for lifelong learning and economic stability. Family Literacy provides adult education students who are parents or guardians with opportunities to improve their academic skills and use those skills to enhance the literacy skills of their children. (Formatted: Normal, No bullets or numbering)
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    - Added: To help eliminate some transportation barriers for many adult learners, adult education and literacy activities are delivered through 51 Adult Education Programs (47 school-district programs, which includes the Palmetto Unified School District of SC, and four community-based organizations) covering more than 150 physical locations. The adult education and literacy activities include South Carolina High School Diploma and High School Equivalency study and completion for out of school youth 17 to 21 years old, and adults 22 and above for all 79 school districts. Moreover, to support high school equivalency preparation, there are multiple GED Tests centers in every Workforce area. Industry-recognized credential career pathway development and Integrated Education and Training collaboration with the SC Technical College System and other post-secondary training providers, College and Career Navigation (Global Career Development Facilitator) wrap-around services, Northstar Digital Literacy training, WIN Courseware, WIN Academic testing, WIN soft skills assessment, workforce preparation activities, and Skills Upgrade classes are all part of adult education literacy activities. Skills Upgrade classes are offered

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**Entity/Organization:** *Bamberg/Barnwell Adult Education (2 of 2)*

**Person Commenting:** *Gracelynn Gleaton*

*Comment:*

**Section III: Operational Planning Elements -**

Page 59, 65: State Strategy: Objective 1: Prepare job seekers for high-wage, high-demand, and high-mobility (4H) occupations through relevant training and skills acquisition, and match job seekers to open employer positions. Strategy 2.1 Increase the percentage of participants that obtain” high-value credentials”.

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credentials into the state's plan, we can ensure that resources and support are available to assist these individuals in obtaining the education and training they need to succeed in today's competitive job market.

#### Page 64: Partner Engagement with Educational Institutions and other Education and Training Providers

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Adult education programs are critical partners within the SC workforce system because they address skills gaps, serve diverse learners, promote lifelong learning, support economic mobility, and strengthen workforce partnerships.

#### Section IV: Coordination with State Plan Programs - **(Section III: Operational Planning Elements)** -

*Section 3 Continued:* Recognizing the importance of adult education programs and integrating them into the broader workforce development strategy is essential for building a skilled, resilient, and inclusive workforce that can thrive in the 21st-century economy.

#### Page 71 and 74: State Program and State Overview A. State-Agency Organization:

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:Committed to continuous improvement and accountability, the Office of Adult Education regularly assesses program effectiveness, evaluates learner outcomes, and solicits feedback from stakeholders. Through data-driven decision-making and performance monitoring, the office identifies areas for enhancement, implements evidence-based strategies, and ensures that adult education programs remain responsive to evolving workforce needs and learner aspirations.

South Carolina Department of Education's Office of Adult Education exemplifies a commitment to excellence, equity, and empowerment in adult education. Through its comprehensive programs, collaborative partnerships, innovative instructional approaches, focus on credentials, and dedication to continuous improvement, the office plays a vital role in advancing the state's workforce development goals and promoting economic prosperity for all South Carolinians.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.59, 65: While the definition of “high-value credentials” provided in the comment is generally acceptable, South Carolina has not defined high-wage, high-demand, high-mobility, high-retention (4H) occupations or high-value credentials. Implementation of this strategy will require the state to create a consistent definition or identify a set of criteria against which programs can use to evaluate credentials. It is widely accepted that a high school diploma or equivalency can increase access to employment and postsecondary education opportunities, as well as increase earnings. As the plan is implemented a definition is crafted, the state will consider the importance of categorizing a high school credential as a credential of value.
- Pg. 65: Strategy 2.1 Increase the percentage of participants that obtain high-value credentials.
  - Added/Edited: The completion of secondary diplomas is a critical part of the workforce development process. Adult Education Programs provide the opportunity for out of school youth 17 to 21 years old and adult learners 22 and older to earn the South Carolina High School Diploma or the High School Equivalency Diploma. Most post-secondary education or training programs require the secondary diploma as a prerequisite to start industry recognized occupational training, or work towards an associate or bachelor’s degree.
  - Adult Education Programs continue to develop and implement Integrated Education and Training (IET) Career Pathways that are developed with the SC Technical College System and other workforce training providers to meet local and regional workforce area needs. Concurrently with IET classes, adult education programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or GEDs, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.
- Pg.71: Added/Edited to Adult Education and Family Literacy Act Program:
  - The OAE has access to all local program information through LACES, and each local program has the capability to run the federally required reports on only their program. At the state level, the OAE can run these reports on all eligible providers. Additionally, the OAE collects reports such as the WIOA Indicator Six (i6R) employer reports that documents local adult education providers interaction with local employers, and the College and Career Navigation report that collects all career and wrap-around services delivered to students.

- Pg.76: Added to State Program and State Board Overview A. State Agency Organization
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Technical support, professional development, and compliance monitoring are provided by Education Associates within the Office of Adult Education. There are 79 school districts in South Carolina. Fifty-one Adult Education Programs with more than 150 physical locations provide adult education and literacy activities in all 79 school districts.

Adult education programs are voluntary and afford opportunities for adult learners 17 and older to obtain a high school diploma, GED, a career readiness certificate, participate in English as a second language classes (ESL), and family literacy (FL). Some adults enroll in Skills Upgrade classes to improve their basic literacy and/or numeracy skills. Integrated education and training career pathways can occur concurrently with these options. Additionally, adult learners are provided instruction to prepare for the WIN academic tests and earn a South Carolina Work Ready Credential, and the WIN Soft Skills Credential.

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**Entity/Organization:** *Bamberg/Barnwell Adult Education*

**Person Commenting:** *Rebecca Guerry*

*Comment:*

**Section II: Strategic Elements -**

(Page 35, 39) Addressing Skill Gaps: The section does not adequately describe how adult education programs address skill gaps in South Carolina’s workforce system. Today’s economy requires a workforce that is not only skilled but committed to continuous learning. Adult education programs are uniquely equipped to not only provide foundational skills education but also to equip adults with the skills necessary to thrive in a rapidly evolving job market. Moreover, high school credentials (high school diploma and high school equivalency diplomas) are often prerequisites for accessing higher education programs and specialized occupational training. Adults enroll in adult education programs at all skill levels, basic, intermediate, and advanced. Adult education programs offer opportunities for upskilling and reskilling that meet the evolving needs of community and industries. Adult education programs are equipped to strengthen the workforce pipeline through targeted education, workforce preparation, and soft skills training. Adult education programs develop pathways that offer a seamless transition from education to employment, ensuring that learners can quickly move into in-demand jobs.

Page 53: C. State Workforce Development Capacity: This section does not adequately describe adult education programs’ capacity to provide workforce development activities. Please consider including the information below.

Adult education offers high school diploma classes to youth and adults over the age of 21 along with GED, workforce preparation training, South Carolina adult education programs serve all 79 school districts in the state including Palmetto United School District. Programs offer morning, evening, and weekend classes in 150 physical locations in the state including rural areas to meet the needs of individuals seeking adult education services. South Carolina adult education programs offer specialized instruction for high-demand industries through Integrated Education Training (IET) Programs, career readiness programs, and workplace literacy programs. Students can earn a high school credential (GED or High School Diploma) and a national, state, and/or industry recognized certification simultaneously. Adult education programs provide an entry-point into job training and employment for out of school youth and adults each year by serving students with high school diploma, high school equivalency, industry-recognized training and occupational credentials and wrap around services.

**Section III: Operational Planning Elements -**

Page 59, 65: State Strategy: Objective 1: Prepare job seekers for high-wage, high-demand, and high-mobility (4H) occupations through relevant training and skills acquisition, and match job seekers to open employer positions. Strategy 2.1 Increase the percentage of participants that obtain” high-value credentials”.

This section refers only to increasing high-value credentials for participants. How is the term “high-value credential” defined in the state’s WIOA plan? High value credentials typically refer to certifications, licenses, or credentials that hold value in the labor market and are recognized, endorsed by industry stakeholders, and are typically aligned with

specific occupations or industries. High school diploma and high school equivalency diploma should also be included in this section.

Increasing the percentage of participants that obtain high school diplomas and high school equivalency credentials (such as the GED) should be included specifically in the state's plan. These credentials support individuals in their efforts to improve their education, skills, and employment prospects, ultimately strengthening our workforce and economy.

Excluding high school diplomas and equivalency credentials from the state's strategy in the WIOA plan overlooks a significant segment of the population served by WIOA striving to improve their skills and prospects. Many individuals who have not completed high school face barriers to employment and economic mobility. By incorporating these credentials into the state's plan, we can ensure that resources and support are available to assist these individuals in obtaining the education and training they need to succeed in today's competitive job market.

Page 64: Partner Engagement with Educational Institutions and other Education and Training Providers

This section does not adequately describe how adult education programs can address the needs of the workforce system through the programs they offer. Please elaborate on what adult education programs do to address the needs of the workforce.

Adult education programs play a pivotal role in addressing skill gaps and building a workforce that is competitive, adaptable, and prepared for the challenges of the future.

Adult education programs serve a diverse population, including individuals with varying educational backgrounds, language proficiency levels, and learning needs. These programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or equivalency credentials, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.

Access to education and training is a key driver of economic mobility. There are 150 physical locations including satellite sites across the state including rural areas. Adult education programs help individuals improve their educational credentials, acquire in-demand skills, and increase their earning potential. By enabling individuals to obtain higher-paying jobs and access career pathways with growth opportunities, adult education programs contribute to reducing poverty, narrowing income inequality, and helping economic prosperity within communities.

Adult education programs collaborate closely with employers, industry partners, community organizations, and other stakeholders to align education and training programs with the needs of the local labor market. By creating strong partnerships with employers and industry associations, adult education programs ensure their curriculum is relevant, responsive, and aligned with industry demands, improving the employability of program participants.

Adult education programs are critical partners within the SC workforce system because they address skills gaps, serve diverse learners, promote lifelong learning, support economic mobility, and strengthen workforce partnerships.

#### **Section IV: Coordination with State Plan Programs - (Section III: Operational Planning Elements) -Section III Continued:**

Recognizing the importance of adult education programs and integrating them into the broader workforce development strategy is essential for building a skilled, resilient, and inclusive workforce that can thrive in the 21st-century economy.

Page 71 and 74: State Program and State Overview A. State-Agency Organization:

This section does not adequately describe all the programs and services that adult education offers, please include the following in the overview of South Carolina Department of Education, Office of Adult Education.

The Office of Adult Education offers a wide range of comprehensive programs designed to meet the diverse needs of adult learners across the state. These programs include adult basic education (ABE), high school equivalency (HSE) preparation, English language acquisition (ESL), workforce readiness, digital literacy training, soft skills training, and

career pathway development. Adult education programs offer adult high school diploma classes for adults over the age of 21.

The Office of Adult Education collaborates closely with various stakeholders, including SC Technical College System, employers, workforce development boards, nonprofit organizations, and other state agencies. These partnerships facilitate the alignment of adult education programs with local workforce needs, industry demands, and economic development priorities. By leveraging the expertise and resources of partner organizations, the office maximizes its impact and promotes seamless transitions for adult learners into employment or further education.

Recognizing the importance of innovative instructional approaches in adult education, the Office of Adult Education utilizes evidence-based practices and instructional practices to improve learning outcomes. Whether through blended learning models, contextualized instruction, technology integration, or competency-based education, the office ensures that adult learners receive high-quality instruction tailored to their unique learning styles and needs.

The Office of Adult Education places a strong emphasis on helping adult learners attain education and training that are aligned with local workforce demands and industry requirements. By offering targeted and education training programs, test preparation assistance, and support services, the office enables individuals to obtain industry-recognized certifications and credentials that enhance their employability and earning potential.

Committed to continuous improvement and accountability, the Office of Adult Education regularly assesses program effectiveness, evaluates learner outcomes, and solicits feedback from stakeholders. Through data-driven decision-making and performance monitoring, the office identifies areas for enhancement, implements evidence-based strategies, and ensures that adult education programs remain responsive to evolving workforce needs and learner aspirations.

South Carolina Department of Education's Office of Adult Education exemplifies a commitment to excellence, equity, and empowerment in adult education. Through its comprehensive programs, collaborative partnerships, innovative instructional approaches, focus on credentials, and dedication to continuous improvement, the office plays a vital role in advancing the state's workforce development goals and promoting economic prosperity for all South Carolinians.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.39, 40: Michael R. King added under Adult Education:
  - Family Literacy
    - The purpose of Family Literacy is to provide an initiative that interrupts generational poverty and low literacy by equipping adult students who are parents or guardians and their children for lifelong learning and economic stability. Family Literacy provides adult education students who are parents or guardians with opportunities to improve their academic skills and use those skills to enhance the literacy skills of their children. (Formatted: Normal, No bullets or numbering)
    - Family Literacy is an extension of services that may be offered by local adult education programs. One goal is to remove childcare barriers experienced by an enrolled student who is a parent or guardian and to increase the student's ability to participate fully in the adult education program. (Formatted: Widow/Orphan Control)
    - Family Literacy program participation must support the interwoven goals of adult education and family literacy for adults to obtain a high school equivalency diploma (HSED), high school diploma (HSD), enter employment, retain employment, transition to post-secondary education and training, choose a career pathway, and obtain the educational skills necessary to become full partners in the educational development of their children.
    - Family Literacy programs are required to include the four components of Family Literacy: Adult Education, Parent Education, Interactive Literacy Activities, and Early Care and Education. The initiative must provide a broad array of services for the student to not only gain educational skills and earn a high school credential but also gain the skills to become the primary teacher for their children and prepare both the parent and the child for success in later life. The components of a Family Literacy program are:



1. Adult Literacy (i.e., Adult Education) with the goal of obtaining a high school diploma, high school equivalent diploma, career readiness certificate, career pathway, postsecondary education, or the military;
  2. Training for Parents (i.e., Parent Education), guardians, or family members regarding how to be the primary teacher for their children and full partners in the education of their children;
  3. Educational Activities between Parent and Child (i.e., Interactive Literacy Activities (ILA)) between parents or family members and their children. ILA must be supported by partnerships such as with the local school district, Head Start, Early Head Start, First Steps to School Readiness, and private partnerships;
  4. Early Childhood Services (i.e., Early Care and Education (ECE)) is age-appropriate education to prepare children for success in school and life experiences. These services may be supported by partnerships such as the local school district, Head Start, Early Head Start, First Steps to School Readiness and/or private partnerships.
    - Family literacy through Adult Education Programs can be found in 15 locations, at least one in every workforce area. (Formatted: Normal, No bullets or numbering)
- Pg.40: Michael R. King added and edited the Integrated English and Literacy portion:
    - Integrated English and Literacy and Civics Education
      - The Integrated English Literacy/Civics Education (IEL/CE) program is authorized by Title II (Adult Education) of the Workforce Innovation and Opportunity Act of 2014 (WIOA).
    - Secondary Diploma Completion
      - Out of school youth 17 to 21 years old and adult learners 22 and older enroll in adult education programs at all academic skill levels (adult basic, adult intermediate, and adult secondary). To assist with secondary diploma completion, adult education providers offer flexible schedules for high school diploma credit classes and high school equivalency diploma preparation classes to youth and adult learners across all workforce areas. These secondary diploma completion classes include workforce preparation activities like digital literacy and other soft skills training. Moreover, secondary diplomas are often prerequisites for accessing higher education programs and specialized industry recognized occupational training.
    - Skills Upgrade
      - Adult education programs offer opportunities for upskilling and reskilling that meet the evolving needs of community and industries in the areas of math, reading, writing, English as a second language, and digital literacy training. Programs are equipped to strengthen the workforce pipeline through targeted education, workforce preparation, and soft skills training.
  - Pg. 53, 54: C. State Workforce Development Capacity
    - Added: To help eliminate some transportation barriers for many adult learners, adult education and literacy activities are delivered through 51 Adult Education Programs (47 school-district programs, which includes the Palmetto Unified School District of SC, and four community-based organizations) covering more than 150 physical locations. The adult education and literacy activities include South Carolina High School Diploma and High School Equivalency study and completion for out of school youth 17 to 21 years old, and adults 22 and above for all 79 school districts. Moreover, to support high school equivalency preparation, there are multiple GED Tests centers in every Workforce area. Industry-recognized credential career pathway development and Integrated Education and Training collaboration with the SC Technical College System and other post-secondary training providers, College and Career Navigation (Global Career Development Facilitator) wrap-around services, Northstar Digital Literacy training, WIN Courseware, WIN Academic testing, WIN soft skills assessment, workforce preparation activities, and Skills Upgrade classes are all part of adult education literacy activities. Skills Upgrade classes are offered to individuals who already have a high school diploma or a higher education level and need to improve math, reading, English, writing, or digital literacy skills.

- Edited: Programs offer flexible schedules to meet the demanding schedules of individuals seeking services. Through Workplace Literacy, Adult Education Providers seeks to serve employers directly by providing customized academic and workforce preparation instruction as determined by specific employer need.
- Pg.59, 65: While the definition of “high-value credentials” provided in the comment is generally acceptable, South Carolina has not defined high-wage, high-demand, high-mobility, high-retention (4H) occupations or high-value credentials. Implementation of this strategy will require the state to create a consistent definition or identify a set of criteria against which programs can use to evaluate credentials. It is widely accepted that a high school diploma or equivalency can increase access to employment and postsecondary education opportunities, as well as increase earnings. As the plan is implemented a definition is crafted, the state will consider the importance of categorizing a high school credential as a credential of value.
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*Comment:*

### **Section III: Operational Planning Elements -**

- Page number 63 of the WIOA State Plan, Section B – Alignment of Activities Outside of State Plan, Regional Collaboration references that Regional Co-Senior Business Consultant and Rural Outreach Initiative models will be used to identify key partners and to assist aligning activities with programs and activities provided by other partners. More clarification would be helpful on the Plan's Alignment of Activities Outside and:
- Its alignment with WIOA State Instruction Number 21-05, SC Works Certification Standards to ensure that that Local Workforce Development Boards are able to assess the SC Works Delivery System Business Services Standards. LWDBs are required to have a fully integrated, multi-agency Business Services Team, in which one (measure) criteria of compliance is that all Business Services Team members are educated on each other's program goals and services; and
- How it supports the SC Works Certification Business Services Standards and the role of the Business Services Team Lead, who must be appointed/reappointed by the LWDB annually;
- Ensuring there is a one-knock approach or coordination to delivering Business Services consistent with the SC Works Certification Business Services Standards.

*Response:* **The State Plan has been revised to include some, or all of the suggested revision(s)**

Removed the strategy action item to 'Implementation of the Senior Business Consultant model that will manage service delivery to key account and foster regional collaboration'.

The Senior Business Service Consultants support SC Works Certification Standards by improving communication with the Business Services Lead and Integrated Business Services Team. By establishing a single point of contact for DEW across regional boundaries, the Business Services Lead is no longer required to contact multiple DEW Staff for major projects, thus streamlining coordination efforts and enhancing mutual understanding of program goals.

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**Entity/Organization:** *Newberry Adult and Continuing Education*      **Person Commenting:** *Anne Caughman*

*Comments:*

### **Section II: Strategic Elements -**

Adult Education is the key to the workforce for students who do not complete school in a regular school setting. Students are able to come to Adult Ed. to obtain a GED or high school diploma so that the door to a job or even higher education is open to them. Through the programs at Adult Ed., students receive instruction to fit their needs, as far as curriculum is concerned, but are also given the opportunity to be enrolled in other classes such as driver's ed., manufacturing, soft skills. All such classes making them better prepared for whatever lies ahead in their future. Classes, at Adult Ed. are offered in the morning and evening to accommodate students, and at times teachers will come at work with them in the afternoons. The goal of Adult Ed. is to have students become successful by addressing the gaps that are missing in their educational lives, as well as, preparing them for a job or for tech school or college. Speakers are also brought in through the year from areas such as military, deputy sheriffs, business people. A trip to Newberry College has also been taken. Adult Education is important to students who do not fit in in the regular school system. Adult Ed. meets not only their needs, but also the needs of others who did not receive their education for some reason or another.

### **Section III: Operational Planning Elements -**

In this planning are you excluding the GED students and the high school diploma students? Many of our students are being assisted by WIOA. If our students don't come to school to get their GED or diploma, how are they going to get a job or further their education? If the GED and diploma are included in the state's plan, then the students will have resources available to help them in obtaining the GED or diploma. Remember, we want these students to be successful. Thru the services of WIOA and Adult Ed., that goal can be accomplished.

What about the needs of the workforce? If the students have at least a GED or diploma, they will be able to get a job. Adult Ed. often provides additional training for the students by offering special courses to assist them - driver's ed., manufacturing, driving a forklift, NA. Where can students get that extra training? Soft skills and writing resumes and included in the curriculum so that students are ready for job interviews.

Through Adult Ed., the needs of many are met - the adult basic learner, the high school student, the English language learner, workforce readiness, digital literacy training, soft skills training, and career pathway. Adult Ed. works with many different post-secondary schools, businesses, organizations and agencies to provide a bond between them. This also leads to the possibility of students being able to go to some of the schools or perhaps obtain jobs at some of the places. Instruction in Adult Ed. is also very important. The goal is for the student to be successful and feel successful as he/she attains his/her goal of a GED/diploma and prepares for the workforce/post-secondary schools. Adult Ed. is committed to doing its best as it educates those who walk through its doors.

### **General Comments -**

WIOA is very important to Adult Ed. GED and diploma should be included in SC PY 2024-2027. WIOA helps many of our students. Please put it in on pages 35, 39 - page 53: C - page 59, 65 - page 64 - page 71, 74 –

### **Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.39, 40 Michael R. King added under Adult Education: Family Literacy
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**Entity/Organization:** *Newberry Adult and Continuing Education*

**Person Commenting:** *Roberta Kinard*

*Comment:*

**Section II: Strategic Elements -**

This section fails to capture the full extent of how South Carolina adult education programs contribute in bridging workforce skill gaps that should be included in the WIOA plan. Adult education programs are essential as they offer foundational and basic skills training to all target populations identified by WIOA. To successfully earn high-value credentials, individuals must have foundational and basic skills. Beyond serving those without high school credentials, adult education programs also offer upskilling and reskilling courses. These are designed for individuals already holding a high school diploma or a college degree, assisting them in either securing employment or acquiring the necessary skills to find a job or advance their careers in the workforce. Regarding the state strategy: Adult education programs offer various programs to meet the needs of a diverse workforce including high school diploma classes for youth and adults over the age of 21. Adult education classes are flexible and accessible with morning, evening, and night classes held throughout the state at over 150 physical locations including rural areas. In addition to high school credentials, individuals in adult education programs can earn occupational certifications and industry-recognized credentials through Integrated Education Training programs and workplace literacy programs.

**Section III: Operational Planning Elements - State Strategy: Objective 1:** This section references high-value credentials and does not specifically mention the need to increase the percentage of participants obtaining high school diplomas or high school equivalency diplomas. In addition to the focus on workforce development, priority service should continue to focus on individuals who are not in the workforce and need adult education and literacy services. Numerous individuals in WIOA's target population including those who are low-income and out of school youth do not have high school credentials. These individuals face multiple barriers to employment and economic advancements. Adult education programs provide resources and support for these individuals and others in obtaining the skills and training needed to be productive citizens and to be successful in the workforce.

Partner Engagement with Educational Institutions and other Education and Training Providers: The description requires further details to explain how adult education programs effectively address workforce needs. The description should include information on the number and demographics of individuals served across the state, a full list of programs offered such as adult high school diploma classes and workforce preparation classes, the total number of program locations within the state, details on established partnerships, and an overview of the various methods through which adult education programs strengthen South Carolina's workforce system.

#### **Section IV: Coordination with State Plan Programs -**

The WIOA federal law pertaining to statewide and local workforce system governance requires "unique" representation of WIOA Adult and Family Literacy programs in the workforce system. "Specifically, to ensure adequate representation of all core programs", the law states that the unique representative must be an individual who is primarily and directly responsible for the core program and who has expertise regarding the core program. There is no direct representation on the Coordinating Council for Workforce Development from the SCDE Office of Adult Education even though Adult Education is a core partner in the workforce system. Adult education programs are excited to work collaboratively with partners, businesses, employers, and other agencies to build a strong, resilient economy where all communities and individuals thrive.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.59, 65: While the definition of "high-value credentials" provided in the comment is generally acceptable, South Carolina has not defined high-wage, high-demand, high-mobility, high-retention (4H) occupations or high-value credentials. Implementation of this strategy will require the state to create a consistent definition or identify a set of criteria against which programs can use to evaluate credentials. It is widely accepted that a high school diploma or equivalency can increase access to employment and postsecondary education opportunities, as well as increase earnings. As the plan is implemented a definition is crafted, the state will consider the importance of categorizing a high school credential as a credential of value.
- Pg. 65: Strategy 2.1 Increase the percentage of participants that obtain high-value credentials.
  - Added/Edited: The completion of secondary diplomas is a critical part of the workforce development process. Adult Education Programs provide the opportunity for out of school youth 17 to 21 years old and adult learners 22 and older to earn the South Carolina High School Diploma or the High School Equivalency Diploma. Most post-secondary education or training programs require the secondary diploma as a prerequisite to start industry recognized occupational training, or work towards an associate or bachelor's degree.
  - Adult Education Programs continue to develop and implement Integrated Education and Training (IET) Career Pathways that are developed with the SC Technical College System and other workforce training providers to meet local and regional workforce area needs. Concurrently with IET classes, adult education programs offer flexible and tailored instruction to accommodate the diverse needs of adult learners, including those seeking to earn high school diplomas or GEDs, improve basic literacy and numeracy skills, learn English as a second language, or acquire job-specific skills required for occupational credentials.

*Comments:*

### **Section II: Strategic Elements -**

This section does not explain the true gap that is filled by our Adult Education programs as it relates to workforce skills that are included in the WIOA plan. Our Adult Education programs provide the foundational skills that are necessary for the targeted population by WIOA. For this population to experience continuous success and earn the high value credentials these foundational skills are crucial.

Regarding the state strategy: Our Adult Education programs offer an array of programs and services to meet the need of our growing divergent workforce together with high school diploma classes for youth and adults over the age of 21. Adult Education classes are flexible and strive to meet the need of the target population at their individual levels.

### **Section III: Operational Planning Elements -**

This section in know way refers to the need to increase the percentage of the targeted population in earning high school diplomas or high school equivalency diplomas.

### **Section IV: Coordination with State Plan Programs -**

The Adult Education Programs are not mention as a representative in the planning meeting or coordination of services offered.

### **Section IV: Common Assurances (For All Core Programs) -**

All programs should have equal representation and input in the planning and implementation of all services that are to be provided.

### **General Comments -**

Our Adult Education programs play a vital role in the successes of the targeted population and should be given the same opportunities and support to provide the needed services for this population to earn their high school diploma or high school equivalency and experience sustainable self-sufficiency.

### **Response: The State Plan has been revised to include some, or all of the suggested revision(s)**

- Pg.59, 65: While the definition of “high-value credentials” provided in the comment is generally acceptable, South Carolina has not defined high-wage, high-demand, high-mobility, high-retention (4H) occupations or high-value credentials. Implementation of this strategy will require the state to create a consistent definition or identify a set of criteria against which programs can use to evaluate credentials. It is widely accepted that a high school diploma or equivalency can increase access to employment and postsecondary education opportunities, as well as increase earnings. As the plan is implemented a definition is crafted, the state will consider the importance of categorizing a high school credential as a credential of value.
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*Comments:*

**General Comments -**

SC VOCATIONAL Rehabilitation did not give my son an opportunity for employment! They have a very unfair, rigid process for adults with a disability to gain employment. My son had several job tryouts but he was turned down each time! The Job Coach had a rehearsed script that was used every time my son went out for a tryout. The staff is obviously not trained in Autism, nor do they want to employ autistic individuals. They expected him to learn a new job after a couple of hours of training. I wasted my time, left work early, and sent my sister to different job sites only to get the same rehearsed script!! That agency obviously wants to employ non-disabled adults!!

**Response: No changes made to the State Plan**

SCVRD is not familiar with this case/situation. The Agency does not have a script for service delivery, and all services are individualized. SCVRD has recently hired a Consumer Services Specialist who is being trained as the subject matter expert (SME) for Autism. Statewide training on Autism is currently being provided by an external trainer to SCVRD staff.

*Comments:*

**Title IV - Vocational Rehabilitation Act Programs - SC Vocational Rehabilitation Department -**

This plan does not allow for individuals with Autism or significant intellectual disabilities who may be able to sustain employment but not through a standard position. A lot of work has been done in the South Carolina on Customized Employment which allows those with significant disabilities the opportunity to identify work opportunities that they will excel in based on their wants and their abilities. Customized Employment creates jobs that do NOT currently exist in the community but which fill a void in businesses and allow individuals the opportunity to find sustainable, paid employment.

**Response: No changes made to the State Plan**

When appropriate, SCVRD job coaches work one-on-one with consumers to identify and implement individualized solutions to address functional limitations, this includes placement needs. SCVRD staff work with all consumers to provide job placements based on the consumers' skills, interests, and abilities. Supported Employment services are provided to our consumers who have the most significant disabilities. Supported Employment is provided to consumers whose disability interferes with the ability to understand aspects of job placement or who are unable to cope in an effective manner in a structured work environment. These limitations may include, but are not limited to the following:

- Problems with learning and understanding specific job tasks due to cognitive impairment.
- Problems associated with adjusting positively to co-workers, supervisors, and the actual job because of an emotional, mental or cognitive impairment.
- Problems associated with using good judgment in completing tasks, making decisions, or interaction with others.
- Problems with effective communications that may hinder their ability to understand job tasks and interact positively with peers and supervisors.

Currently Customized Employment is a program that VR is developing and cannot be provided as a service.

*Comments:*

**General Comments -**

Vocational Rehabilitation has a history of not finding jobs for individuals based up on their preferences and needs but as a quick fix which is then not sustainable. This plan does not build confidence in SCVRD stepping up and doing the job that they are receiving funding to do.

**Response: No changes made to the State Plan**

VR counselors and job coaches assist consumers in pursuing employment that is consistent with their interests. Informed choice is based on the premise that consumers with disabilities should have influence on and input into the processes and services that affect their vocational rehabilitation. This process encourages an increased sense of responsibility and ownership by the applicant/consumer. The partnership between the applicant/consumer and the VR team increases the likelihood of successful employment and consumer satisfaction. South Carolina ranks #4 nationally in VR participants' rates of employment in the 2nd quarter after program exit and #7 nationally in the 4th quarter after exit. These measures are indicators of sustained quality employment on career paths.

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**Entity/Organization:** *Telamon/TRC (1 of 2)* **Person Commenting:** *Debra Young*

*Comments:*

**General Comments-**

We have rebranded and are now Telamon/TRC instead of Telamon Corporation. Please make the change in the Plan to reflect our new name.

**Section 6 (c)**-does not include how the state will report or receive data for individuals served through the local AJC by NFJP services to ensure an accurate way to capture the individuals coming into the Career Center who are receiving NFJP services via WP referral. If appropriate, we would like some language addressing how this data will be reported.

**Response: The State Plan has been revised to include some, or all of the suggested revision(s)**