

**IMPERIAL COUNTY WORKFORCE DEVELOPMENT BOARD  
2019 BIENNIAL MODIFICATION TO 2017-2021 LOCAL PLAN**

**TABLE OF CONTENTS**

<b>PRINCIPAL NARRATIVE</b>		<b>Page</b>
I.	<b>Introduction</b>	
II.	<b>Collaboration with the CalFresh Employment and Training Program and Strengthened Partnership with Imperial County Department of Social Services</b>	4
	A. Braiding Resources and Coordinating Service Delivery for People Receiving CalFresh to Participate in Workforce Services, Sector Pathway Programs, Supportive Services and Retention Efforts	4-5
	B. Workforce System Collaboration with Community Organizations Serving Specific CalFresh Populations	5
	C. Workforce Services Available to People Receiving CalFresh That Are Funded by Local/Regional Partners	5
	D. Partners' Roles in Helping Provide Services to and Integrating People Receiving CalFresh into Sector Pathway Programs	5
	E. Coordination among Partners to Provide Supportive Services to this Population and Facilitate Program Completion	5-6
	F. Strategies to Retain Participants in Regional Sector Pathway Programs and Employment	6
III.	<b>Partnership with Imperial County Child Support Services</b>	6
	A. Existing Workforce and Education Program Partnerships	6
	1. Partners' Collaboration to Provide Supportive Services to Enhance Job Retention	6
	2. Comprehensive Services to Facilitate Labor Market Success and Career Advancement	6-7
	3. Impact of WIOA Eligibility Criteria on Serving the Target Population	7
	4. Other Obstacles to Serving the Child Support Program Population	7
	5. Strategies to Motivate and Support Participation	7
	6. Opportunities for and Obstacles to Local Partnerships	7
	B. Plans for Building Successful Partnerships or Scaling up Existing Successful Partnerships	7
	1. Strategies to Support Participant Retention in Training Programs	7-8
	2. Existing, New, and Prospective Workforce and Training Partnerships	8
	3. Braiding Resources and Coordinating Service Delivery	8
	4. Coordination with Community-Based Organizations to Serve the Target Population	8
	5. Referral Processes and Systems	8
	C. Working with Imperial County Child Support Services to identify incentives to increase the success of NCPs' sustained participation in local workforce programs	8
IV.	<b>Partnerships and Engagement to Support Greater Opportunities for Competitive Integrated Employment</b>	8-9
	A. AJCC Staff Knowledge and Training Needs about Serving Individuals with Intellectual or Developmental Disabilities and about Programs and Resources Available for the Target Population	9
	B. Planned Coordination with DOR Point of Contact Regarding Services and Resources for the Target Population Who Are Vocational Rehabilitation Consumers	9
	C. DOR Collaboration in Outreach to Employers and Partners to Support Opportunities for Individuals with Intellectual or Developmental Disabilities to Achieve Competitive Integrated Employment	9-10

V.	<b>Collaborative Strategies to Strengthen Services for English Language Learners, Foreign Born Individuals and Refugees</b>	10
	A. Sharing Resources and Coordinating Services for the Target Population	10
	B. Increasing Access to Sector Pathway Programs	10-11
	C. Ensuring the Availability of Support Services	11
	D. Promoting Retention in Training, on the Job and in Career Path Progression	11
	E. Coordination and Alignment with Other Plans and Planning Partners	11
	F. Coordination with the National Farmworker Jobs Program	11-12
	G. Recognizing and Replicating Best Practices	12
VI.	<b>Other Modifications to Imperial County WDB's 2017-2021 Local Plan</b>	12
	A. Imperial County Economy	12
	B. Progress on 2017-2021 Local Plan Goals	12-13
	C. Emerging Priorities	13
<b>SUPPLEMENTAL NARRATIVE</b>		<b>Page</b>
<b>Attachment A: Stakeholder and Community Outreach and Involvement in the Two-Year Review of the Local Plan</b>		14
1.	<b>Overall Strategy for Community Outreach and Stakeholder Engagement to Support Modification of the Local Plan</b>	14
	A. Approach to Conducting Population/Partnership-Specific Input Sessions	14-15
	B. Use of an Experienced Facilitator to Guide and Support Discussion	15
	C. Capturing Community and Stakeholder Input	15
	D. Harnessing Intelligence from On-Going Stakeholder Engagement	15-16
	E. Strengthening Communities of Support around Key Populations and Partnerships	16
2.	<b>Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New Partnership with CalFresh</b>	16
	A. Outreach Activities	17
	B. Efforts to Engage Required CalFresh Partners	17
	C. Communication with the State Board regarding CalFresh Forum	17
	D. Documentation of Efforts	17
3.	<b>Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New Partnership with Imperial County Department of Child Support Services</b>	17-18
	A. Outreach Activities	18
	B. Efforts to Engage Required Child Support/Non-Custodial Parent Partners	18
	C. Communication with the State Board regarding Child Support/Non-Custodial Parent Forum	18
	D. Documentation of Efforts	18
4.	<b>Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New and Enhanced Partnership with Competitive Integrated Employment Initiative Partners</b>	18-19
	A. Outreach Activities	19
	B. Efforts to Engage Competitive Integrated Employment Partners and Key Stakeholders	19
	C. Communication with the State Board regarding Competitive Integrated Employment Forum	19
	D. Documentation of Efforts	20
5.	<b>Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New and Enhanced Partnership with Organizations Serving English Language Learners, Foreign Born Individuals and Refugees</b>	20
	A. Outreach Activities	20
	B. Efforts to Engage Partners and Key Stakeholders in Improving Services to English Language Learners, Foreign Born Individuals and Refugees	20

	C.	Communication with the State Board regarding Forum on English Language Learners, Foreign Born Individuals and Refugees	20
	D.	Documentation of Efforts	20-21
6.	<b>Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's Overall Approach to Workforce Programming and Planning through a General Community Forum</b>		21
	A.	Outreach Activities	21
	B.	Efforts to Engage Partners and Key Stakeholders in Providing Input on General Workforce System Planning	21
	C.	Communication with the State Board regarding General Community Forum on Workforce System Planning	21
	D.	Documentation of Efforts	22
7.	<b>Publication of Draft for Public Comment</b>		22
	A.	Notice on the Availability of the Draft Plan for Public Review and Comment	22
	B.	Opportunities and Mechanisms for Public Comment	22
	C.	Results of Invitation for Public Comment	22-23
	D.	Documentation of Efforts	23
<b>Attachment B: CalFresh Participants – Background and Assessment of Need</b>			24
1.	Overview of the Size and Characteristics of the Total CalFresh Recipient Population		24
2.	Overview of the Size and Characteristics of CalFresh E&T Participants		24
3.	Types of Workforce Services Needed by the Target Population		24-25
4.	Employment Barriers Experienced by the Target Population and Resources Available to Address Barriers		25
5.	Collaboration between the WDB and Imperial County Human Services Agency		25
6.	Quality and Level of Intensity of Partner Services		25-26
7.	Information Sharing among Partners		26
<b>Attachment C: Unemployed, Underemployed and Payment Delinquent Non-Custodial Parents – Background and Assessment of Need</b>			27
1.	Areas of High Concentration		27
2.	Percentage of Noncustodial Parents Who Are Unemployed		27
3.	Percentage of Noncustodial Parents Who are Ex-Offenders		27
4.	Other Demographic Information		27-28
5.	Types of Services Needed by the Targeted Population		28
6.	Services Currently Being Provided and How the Workforce-Child Support Partnership Will Modify Types and Quantity of Services Provided		28
7.	Barriers Experienced by Child Support Program Participants and Resources to Address Barriers		28
8.	Planned Information Sharing to Evaluate Need		29
<b>Attachment D: Engagement with Local Competitive Integrated Employment Partners</b>			30
1.	Engagement with Local Partners to Increase Competitive Integrated Employment for Jobseekers with Intellectual or Developmental Disabilities		30-31
2.	Competitive Integrated Employment Partners (List)		31
3.	Planned Coordination with the CIE Local Planning Agreement Partners		31
<b>Attachment E: English Language Learners, Foreign Born Individuals and Refugees – Background and Assessment of Need</b>			32
1.	Overview of Target Population Demographics		32
2.	Barriers to Employment and Specialized Needs of the Target Population		32
3.	Identified Gaps in Workforce System Services for the Target Population		32-33
4.	Outreach and Recruitment Strategies for the Target Population		33-34
5.	Coordination and Alignment among Partners in Serving the Target Population		34
6.	Additional Data Concerning Foreign Born Individuals in Imperial County		34-36
<b>Attachment F: Public Comments in Disagreement with Local Plan</b>			37
<b>Exhibits</b>			38

**IMPERIAL COUNTY WORKFORCE DEVELOPMENT BOARD**  
**2019 BIENNIAL MODIFICATION TO 2017-2021 LOCAL PLAN - PRINCIPAL NARRATIVE**

**I. INTRODUCTION**

To implement California's Biennial Modification and Review requirements for our 2017-2021 Local Plan, the Imperial County Workforce Development Board's (WDB) leadership team adopted a strategy that was intensively focused on engaging stakeholders, including those representing businesses and members of the community, in interactive discussions about needs and service strategies for key target populations. Five forums, which were publicized to the community, were held. While one was of a general nature, seeking input on the overall content of the workforce services, the other four focused on the partnerships and populations to be addressed in the Local Plan Modification:

- A New Partnership with CalFresh and the CalFresh Employment and Training Program
- A New Partnership with Child Support Services to Service Unemployed, Underemployed and Payment Delinquent Non-Custodial Parents
- Enhanced Partnerships with the Department of Rehabilitation and the Disability Service Network to Increase the use of Competitive Integrated Employment for Persons with Intellectual or Developmental Disabilities
- Improving Services for English, Language Learners, Foreign Born Individuals and Refugees

The following narrative addresses the preceding topics and concludes with an economic and programmatic progress update to Imperial County's 4-year plan.

**II. COLLABORATION WITH THE CALFRESH EMPLOYMENT AND TRAINING PROGRAM AND STRENGTHENED PARTNERSHIP WITH IMPERIAL COUNTY DEPARTMENT OF SOCIAL SERVICES**

The Imperial County Department of Social Services (DSS) is responsible for CalWORKS and other public welfare programs, including: Medi-Cal; Welfare to Work, General Assistance and CalFresh. DSS is a one-stop partner and, therefore, is part of the network of agencies that comprise the local workforce development delivery system. CalFresh participants are diverse. They include families, some led by single parents, and individuals. Many are unemployed, while others are low wage earners. In Imperial County, many CalFresh participants live in poverty and rely on other forms of public assistance and social support services. Because the group consists of individuals with many distinct needs, participants are served by all types of education, social services and support organizations in the county, including the America's Job Center of California (AJCC). Engagement with DSS during the recent planning process revealed the status of CalFresh Employment and Training (E&T) programs in Imperial County. DSS representatives indicated that the County had not yet implemented a CalFresh E&T program. DSS representatives indicated that the department, thus far, had developed only a basic blueprint for what the program might look like in Imperial County. DSS has engaged with State CalFresh E&T program leadership to discuss options and has formulated some ideas for the program design, based on benefits that such a program would provide to CalFresh recipients and opportunities it would create to access the 50% reimbursement for the use of non-federal funds for allowable activities provided to eligible individuals. DSS identified opportunities for a partnership with various programs operated by Imperial Valley College that would be well suited to the target population. In 2019, DSS intends to expand upon its basic concept for the CalFresh E&T program. This process will include development of a fully functional program design that may include, department-administered services or a model using a third-party provider (such as the college). In addition, DSS would prepare a CalFresh E&T Plan and seek approval of the plan from the California Department of Social Services. DSS will apprise the WDB and Imperial County Workforce Development Office (WDO) of its progress in developing plans for implementation of a CalFresh E&T program.

With regard to topics concerning alignment, coordination and integration, the responses below address approaches for the general CalFresh population, as the CalFresh E&T program has not yet been implemented. For additional information concerning background and needs assessment of participants in the CalFresh Program in Imperial County, please refer to descriptions provided in Attachment B.

***A. Braiding Resources and Coordinating Service Delivery for People Receiving CalFresh to Participate in Workforce Services, Sector Pathway Programs, Supportive Services and Retention Efforts:*** Given the size and diversity of the population that participates in the CalFresh Program, individuals in this target group are served by many of the workforce system partners and allied stakeholders. Workforce services begin with an assessment of participants' needs and evaluation of their background, experience and circumstances. A service strategy is customized to meet

education, training and support needs. When CalFresh participants seek services through the AJCC, they are oriented not just to the services provided under WIOA, but to programs and resources available through the one-stop partners and other service agencies. A service plan is developed that addresses their full range of needs, but which has skills development and employment as primary goals. Many CalFresh participants are referred to education partners for training ranging from adult basic education to career technical education courses that prepare them for jobs in local and regional target sectors. Linking participants to community-based resources for housing, medical, legal and other services is part of a braided strategy to ensure participants are equipped to complete training and succeed in the workplace.

***B. Workforce System Collaboration with Community Organizations Serving Specific CalFresh Populations:*** For CalFresh participants, a wide range of strategies are used by the workforce system to coordinate and leverage resources from stakeholders of all types. Individuals with particular circumstances and barriers (e.g. job seekers with disabilities, formerly incarcerated individuals, migrant and seasonal farmworkers) will often qualify for specific types of funding and programs, and, in some cases, are referred by those programs to the AJCCs and other workforce system providers. County and state justice system agencies, WIOA Section 167 Farmworker programs, the State Department of Rehabilitation (DOR) and other disabilities services agencies, veterans services programs, programs serving seniors and other organizations with a unique, population-specific focus are part of the workforce system's extended network. Referrals, co-enrollments and service coordination are commonplace among stakeholders.

***C. Workforce Services Available to People Receiving CalFresh That Are Funded by Local/Regional Partners:*** The types of services available to CalFresh participants are outlined above. Again, the diversity of the population suggests that needs vary significantly. Stakeholders indicate that many in this target group have low levels of educational attainment and few skills with which to compete in the current labor market. The nine education agencies that make up the Imperial County Adult Education Consortium offer a wide array of basic education, literacy, ESL and career technical education programs to which CalFresh participants will be referred. Most organizations serving CalFresh individuals do not use CalFresh enrollment status as a basis for eligibility/participation and do not record this data. Therefore, baseline service levels for most education, training and support programs are not available. Some programs and providers do collect information regarding their participants' CalFresh status. For example, in PY 2017-18, the WDO, through the AJCCs, served a total of 141 CalFresh participants in our WIOA Title I formula-funded programs.

Even without the availability of baseline service levels, the recent Biennial Modification planning and the community and stakeholder engagement process have made clear that there is potential to serve a greater number of CalFresh participants in workforce development and career technical education programs by the partners' working together to promote services to this population. Under the WDB's leadership, the one-stop partners will work together with DSS to identify and develop strategies to specifically market workforce and training programs for CalFresh participants. In addition, the WDO and DSS have agreed to develop a referral system specific to the CalFresh population to encourage participants to take advantage of AJCC and workforce system services.

***D. Partners' Roles in Helping Provide Services to and Integrating People Receiving CalFresh into Sector Pathway Programs:*** The WDO, DSS and the full range of local workforce system partners are all committed to ensuring that participants' training and employment preparation are focused on demand occupations within priority sectors that hold promise for career advancement, wage gains and a family supporting income. Over the last several years, the Imperial County WDO has been focused on providing career exploration, service planning, career guidance, case management, work-based learning and referrals to training that are sector pathway-focused, concentrating on demand industries that are creating jobs and are stimulating economic growth throughout the region. Participants benefit from this focus by participating in services designed to qualify them for jobs that will lead to careers with good wages and benefits. Career pathway training available to CalFresh participants includes, but is not limited to, courses designed to meet changing needs in manufacturing; training to prepare workers for jobs in the growing transportation/logistics sector in the county; and a wide range of programs to prepare students for entry-level and higher positions in healthcare.

***E. Coordination among Partners to Provide Supportive Services to this Population and Facilitate Program Completion:*** WIOA, CalFresh, the Rehabilitation Act and many other programs for which some CalFresh participants may qualify allow a portion of funds to be used to provide a variety of support that enables participation in services and training and successful transition to employment. For individuals needing supportive services (e.g. housing,

transportation, childcare) that may exceed the resources available through public workforce and education programs, referrals are made to public and non-profit providers throughout the county, which are described throughout this Local Plan Modification narrative. As indicated above, the delivery of services to CalFresh and other workforce system participants begins with assessment and service planning. These services are critical in determining support needs and form the basis for designing a program of support that will ensure a participant's success. Additional information on supportive services is provided in Attachment B.

***F. Strategies to Retain Participants in Regional Sector Pathway Programs and Employment:*** AJCC staff and representatives of our workforce services partners (e.g. EDD, DOR, local education agencies) orient all prospective candidates to workforce, education and training services that are available to support their career goals. This is followed by assessment and service planning that not only ensure that suitable workforce services are identified, but that customers understand the actions required to advance on a career path that will pay family sustaining wages. These include gaining work experience in an occupation and, frequently, continuing education and training to secure credentials that businesses recognize and value. Services, including counseling and case management, provide encouragement to motivate participants to complete training and pursue their career objectives.

### **III. PARTNERSHIP WITH IMPERIAL COUNTY CHILD SUPPORT SERVICES**

The workforce system's partnership with the Imperial County Child Support Services (CSS) represents the enhancement of an existing relationship among the WDO, the AJCCs and Child Support. Currently, referrals may be made from Child Support to the AJCCs pursuant to a court order, requiring job search activity in exchange for meeting a specified obligation and the reinstatement of revoked licenses. While this approach is yielding some success, as a result of the WDO's recent stakeholder engagement process, CSS and the WDO have agreed to develop an MOU that outlines a structured relationship for cross-referrals. The WDO, CSS and the entire network of one-stop partners are fully committed to building a strong partnership to improve employment outcomes for NCPs with child support orders. For background information on the target group and an assessment of need, please refer to descriptions provided in Attachment C.

#### ***A. Existing Workforce and Education Program Partnerships***

1. Partners' Collaboration to Provide Supportive Services to Enhance Job Retention: The population comprising non-custodial parents with child support orders, who are unemployed, underemployed or payment delinquent, is extremely diverse and experiences a vast array of circumstances. Some individuals are completely disconnected from the labor market, having never worked a traditional job and possessing few marketable skills. Others may be formerly incarcerated individuals, including those who are recently released and, therefore, unemployed. Still others may be English language learners, persons with disabilities, disconnected youth or older workers. Some, as a result of their circumstances, are homeless, lack transportation, and need a combination of services to meet basic needs. The common thread among them is their status with regard to child support payments, employment and the ability to command family supporting wages within the marketplace. Given the diversity of the population and the spectrum of support needs that is likely to exist, AJCC staff will work individually with each non-custodial parent to determine supportive service needs. Staff is experienced in assessing needs at various levels and in surveying the community for resources. Foremost on the list of support services to be addressed are those corresponding to fundamental needs such as food, housing and clothing. While WIOA and other federally-funded programs that comprise the one-stop partners may be able to make support funds available on a one-time basis or for short-term interventions to meet these needs, AJCC staff has developed linkages with local organizations to address these needs. AJCC and workforce system partner staff will also work with NCP customers to determine if there may be resources within their personal networks (e.g. family members, friends) that may be able to assist with fundamental support needs. Other "stabilizing" services may include counseling and health services, which can be obtained through referrals to a wide range of agencies, including behavioral and other public health services and community clinics. Support services that enable participation in training and a successful transition to employment generally include assistance with transportation, work-related clothing, tools and similar services. Such services are available from WIOA, through other one-stop/AJCC partners and through various community agencies. To build a stronger network of support for this population, case managers from all organizations will confer regularly to ensure that the full range of customers' support needs continue to be met throughout program participation and in the months following employment.

2. Comprehensive Services to Facilitate Labor Market Success and Career Advancement: As indicated above, AJCC staff and representatives of our workforce services partners (e.g. EDD, DOR, local education agencies) orient all

prospective candidates to workforce, education and training services that are available to support their career goals. This is followed by assessment and service planning that not only ensure that suitable workforce services are identified, but that customers understand the actions required to advance on a career path that will pay family sustaining wages. These include gaining work experience in an occupation and, for many, continuing their education and training after starting a job to secure credentials that businesses recognize and value. Staff will work with each NCP to develop short-, mid- and long-range employment goals. Based on the child support obligations of targeted NCPs, the partners recognize that they have a need to identify employment paying wages sufficient to meet these obligations and provide enough remaining income so that the NCP can support him/herself. CSS and other stakeholders strongly emphasized the need to concentrate on jobs paying a living wage. Therefore, staff may recommend that NCPs consider employment options where an entry-level worker can earn relatively good wages after minimal training or while learning on the job. Among the regional priority industries offering such opportunities are manufacturing and transportation and logistics, and construction. Once the NCP is working and meeting support obligations, s/he can take advantage of training programs that will offer opportunities for even higher wages in these industries or in other sectors, such as healthcare

3. Impact of WIOA Eligibility Criteria on Serving the Target Population: Imperial County CSS and other system partners that serve targeted NCPs indicated that two features of WIOA eligibility criteria may impact the ability of NCPs to participate in federally-funded workforce services. These are registration for selective service and documentation of right to work, which affects a significant number of targeted individuals in Imperial County. With regard to selective service, local boards can review circumstances and have the authority to “forgive” the non-compliance with registration requirements, allowing non-registrants to participate in WIOA. The state has recently published guidance on required collection of right to work documentation for various services under WIOA. While NCPs lacking documentation could use resource information at the center and be referred to non-federally-funded programs for assistance, the AJCC would be unable to provide such individuals WIOA individualized services.

4. Other Obstacles to Serving the Child Support Program Population: Local Child Support professionals and others that work with the NCP population have indicated that the only significant obstacle to providing workforce services to the Child Support Program population is individual NCPs themselves. Based on workforce-child support pilots that have been implemented elsewhere (such as Los Angeles County) and on their own experience working with this population, stakeholders anticipate that many NCPs referred to WIOA/AJCC services will be interested in the opportunity to prepare for jobs that can lead to family-supporting wages and in CSS “incentives,” which are described below. Still, others will not initially be convinced that any “public program” to which Imperial County CSS is making referrals would be beneficial, as they have a negative perception of the agency. According to stakeholders, many individuals that are in significant arrears on child support payment are so distrustful of Child Support Services and “the government” in general that they work exclusively in the underground economy, where they pay no taxes and their funds, however limited, remain out of reach. All agree on the long-term ill effects this has on NCPs. Key to making the new partnership work will be the stakeholders’ developing and promoting messages to NCPs that are benefits-focused and clearly demonstrates that workforce services offer a path to in-demand jobs, careers and good wages. Imperial County CSS leadership and staff acknowledged that perceptions and messaging are core issues and that altering perceptions about the child support agency is critical.

5. Strategies to Motivate and Support Participation: Imperial County Child Support Services’ first priority is to ensure that the county’s children are financially supported and well cared for. Department staff attempts to make children the motivating force for NCPs to meet their support obligations. CSS has at its disposal a series of “enforcement tools,” such a revocation of drivers’ and professional licenses, attachment of wages, and imposing liens. Conversely, there are several “motivation tools” that CSS may utilize to encourage NCPs to take advantage of workforce programs and services. Among these are: restoration of licenses; revisiting support orders to ensure they reflect the current circumstances of the NCP; and deferring or lessening the requirement for payment during the time in which NCPs are engaged in workforce services, training and job search. CSS is prepared to use the “incentives” described above to encourage NCP’s efforts to gain skills, engage in job search, and be successful in their careers.

6. Opportunities for and Obstacles to Local Partnerships: No significant obstacles have been identified to stakeholders’ engaging in a meaningful and productive partnership.

### ***B. Plans for Building Successful Partnerships or Scaling up Existing Successful Partnerships***

1. Strategies to Support Participant Retention in Training Programs: Communication and the ability to make referrals from the workforce system currently exist, but these fall short of a comprehensive and unified approach. Under a more

structured partnership, the WDO and CSS will develop an MOU that will frame roles, responsibilities and processes associated with their enhanced partnership. Among the provisions of the agreement is a commitment to maintain communication on the services and outcomes of participants, thereby encouraging both agencies to support participants in achieving their employment and wage goals. Providing supportive services and leveraging “incentive tools” from Child Support Services will be key strategies to encourage participants’ retention in training and services. AJCC staff and partners will assist customers in setting goals and devising long-range career plans, which may include multi-year, multi-step processes to gain work experience and develop high-demand technical skills. The planning process will provide a “road map” for participants to progress on a career path on which experience and attainment of skills and credentials will increase earning power and enable them to earn family sustaining wages.

2. Existing, New, and Prospective Workforce and Training Partnerships: As described above, a working referral relationship already exists between the workforce system and DCSS. However, a newly drafted MOU will provide structure and establish processes that will improve the effectiveness of the relationship. The MOU will outline the purpose of the agreement, roles of each department, shared responsibilities and confidentiality requirements. Incorporated into the agreement are: provisions for referrals of NPCs from Child Support to the AJCC and from the AJCC to Child Support; a consent and release form pertaining to sharing specific types of information between the two agencies; and mechanisms for AJCCs to report workforce program activities and employment outcomes to Child Support. The Imperial County partners expect that the MOU will be finalized and executed no later than July 1, 2019.

3. Braiding Resources and Coordinating Service Delivery: By entering into an MOU with the WDO, the Child Support system immediately becomes connected to the entire workforce system, including the WIOA-mandated one-stop partners and a host of local government programs, community agencies, and faith-based organizations that are stakeholders in and contributors to workforce service delivery. AJCC staff will function as the principal case managers for NCPs enrolled in workforce programs, but will make referrals and promote co-enrollments to training and service partners, thereby accessing additional resources.

4. Coordination with Community-Based Organizations to Serve the Target Population: Given the diverse nature of the target population and the fact that NCPs, generally, do not identify themselves as such, local CBOs are not aware of the number individuals from this population that they are serving. AJCC staff is often unaware that a customer has an order for payment of child support. Staff indicates that an issue signaling payment delinquency is a customer having a suspended drivers’ license. During the stakeholder engagement process, representatives of GEO Re-entry Services, which serves formerly incarcerated individuals, indicated that nearly 80% of the organization’s clients in Imperial County have a child support enforcement order. The organization offers relationship and parenting classes to help the individuals plan for a better future and to interact productively with children that they may not have seen in a long time. The organization takes an assets-based approach to working with clients, having them focus on goal setting and planning as they chart a course to success.

5. Referral Processes and Systems: The Imperial County partners plan to implement a structured referral process and forms like ones used elsewhere in the state. The parties to the MOU will follow a referral process where Child Support communicates with a designated single point of contact (liaison) at the AJCC about customers being referred. Child Support will also assign a liaison as a single point of contact. Child Support will provide customers a referral form that identifies them to AJCC staff as Child Support participants. When a referred customer registers at the AJCC, center staff will notify Child Support of the enrollment and workforce activities, providing updates no less than quarterly. This notification will include information that communicates that the referred individual has registered or enrolled and the services he or she is participating in. It will also include a consent and release form signed by the participant. While it is anticipated that most referrals will come from Child Support to the AJCC, referrals from the centers to CSS may also occur (in a case, for instance, where a participant needs to get a drivers’ license reinstated). Staff will send referrals to CSS for registered customers only.

***C. Working with the Local Child Support Agency to Identify Incentives to Increase the Success of Non-Custodial Parents Sustained Participation in Local Workforce Programs***

Tools and incentives to promote participation and retention are those described under item II.A.5, above.

**IV. PARTNERSHIPS AND ENGAGEMENT TO SUPPORT GREATER OPPORTUNITIES FOR COMPETITIVE INTEGRATED EMPLOYMENT**

In September 2018, the Imperial County WDB convened stakeholders from the disability services community and other interested parties in a forum focused on use of CIE. Among those invited were representatives of the local agencies



that represent the state CIE partners: the El Centro Branch of the Inland Empire DOR District Office; the San Diego Regional Center's Imperial County facility; and the Imperial County Office of Education's Special Education Department, along with other local education agencies (LEAs). An LPA for Imperial County is under development, and will be based on the model used in neighboring San Diego County. Given the content and structure of the San Diego LPA, the local partners anticipate that the purpose of the LPA for Imperial County will be to enhance and strengthen partnerships that promote the career preparation and successful placement of youth and adults with disabilities into competitive, integrated employment (CIE). The primary target group will be those identified as having an intellectual and/or developmental disability (ID/DD) and may include others whose disability creates similar barriers to employment. The LPA will identify the core partners (i.e. DOR District Office, regional center and LEAs) and describe the intention of the LPA core partners to identify and leverage the talents and resources of community partners and programs. The San Diego agreement indicates that community partners are local entities whose mission, goals, and primary purpose are aligned with the LPA and that are focused on increasing the number of youth and adults with disabilities that will become successfully employed in an integrated setting, earning a competitive wage, and in a career or job that meets their vocational desires or goals. Included among the community partners are: the AJCC system; community colleges and universities; career technical education programs; community rehabilitation programs; behavioral health; foster youth programs; independent living centers; family resource centers; and local chambers of commerce. As similar organizations operate in Imperial County and have expressed an interest in supporting the goals of the statewide CIE Blueprint and the local initiative, it is widely expected that these organizations will be included as community partners in the Imperial County LPA.

Regardless of the exact content of the LPA once finalized, it is clear that the agreement will build on a strong foundation, as there is an active and collaborative array of public and private organizations in Imperial County that serve individuals with disabilities, including those with ID/DD. Among them are: the LPA core partners: education partners of all types: the WDB, the AJCCs and the workforce system network; and a group of non-profits committed to serving the disability community. This latter group includes, but is not limited to: Toward Maximum Independence, ARC Industries and Access to Independence. The work of the Special Education Local Plan Area (SELPA) agencies alone is significant in the county. Currently, there are 15 SELPA classrooms operating within 10 districts providing pre-employment and employment services to a wide range of students with mild to moderate disabilities. It is not yet clear if the LPA will specify a role of the WDB, the AJCCs or the workforce system in supporting DOR's business outreach efforts in connection with the CIE initiative. For additional information on the LPA partners and anticipated plans to increase the availability of CIE in Imperial County, please refer to descriptions provided in Attachment D.

***A. AJCC Staff Knowledge and Training Needs about Serving Individuals with Intellectual or Developmental Disabilities and about Programs and Resources Available for the Target Population:*** Both Imperial County WDO/AJCC staff and managers and staff representing the system partners have expressed interest in training from the LPA partners about the workforce-related needs and barriers of individuals with ID and DD, as the workforce system, overall, has limited experience working with this target group. The local board and its partners have significant experience serving individuals with disabilities, but many providers acknowledge the need for CIE-specific training. The partners identified several topics for additional training. These include: navigating the workforce system on behalf of individuals with disabilities; primer in disabilities resources for employment and related services; understanding reasonable accommodations; managing family dynamics; working with clients through adult transition; and understanding social security benefits and the effect of employment on these benefits. DOR representatives have indicated that the agency's Work Incentive Planner can provide training on working with individuals receiving SSI or SSA to understand the impact of employment on these benefits. State guidance on the CIE initiative indicates that DOR and State Board leadership will ensure that training is available for AJCC staff and that the DOR District Office will assign a point of contact to support the workforce system's CIE activities. Once this occurs, Imperial County WDB will work with state and local CIE partners to secure training for AJCC staff and system stakeholders.

***B. Planned Coordination with DOR Point of Contact Regarding Services and Resources for the Target Population Who Are Vocational Rehabilitation Consumers:*** Imperial County WDO has not yet been assigned a DOR point of contact for the CIE expansion initiative. We intend to work closely with our DOR-assigned contact to engage with contractors that serve the target population and to coordinate our services with the LPA partners.

***C. DOR Collaboration in Outreach to Employers and Partners to Support Opportunities for Individuals with Intellectual or Developmental Disabilities to achieve Competitive Integrated Employment:*** Imperial County WDO

and AJCC representatives currently collaborate with DOR to serve customers with disabilities. Supporting DOR's and the LPA's business outreach efforts to expand the use of CIE would be a natural extension of our current, productive working relationship. While DOR has not communicated to the WDO its goals or its approach to increasing CIE opportunities through the LPA, we envision being able to support DOR's efforts in several ways. These include:

- Identifying businesses within the County that employ individuals in jobs that would be suitable for CIE, ensuring that opportunities are identified that complement the various capabilities of individuals in the ID/DD target group;
- Developing a CIE-specific business outreach plan for the County;
- Establishing a unified strategy for promoting CIE candidates to local businesses, again taking into consideration individual capabilities and needs;
- Making direct contact with business representatives on behalf of LPA customers; and
- Orienting employers to CIE, developing work-based learning agreement and ensuring the necessary services and supports are in place to promote successful job placement.

Following DOR's assignment of a CIE liaison, which we anticipate will occur in early 2019, the Imperial County WDO will work with DOR and the LPA partners to define our specific role in the CIE business outreach process.

## **V. COLLABORATIVE STRATEGIES TO STRENGTHEN SERVICES FOR ENGLISH LANGUAGE LEARNERS, FOREIGN BORN INDIVIDUALS AND REFUGEES**

In Imperial County, of the approximately 183,830 people who call the county home, nearly eight-five percent is Hispanic or Latino and nearly one-third is foreign-born. The vast majority of immigrants are from Mexico, with which Imperial County shares a border. English language learners (ELLs), foreign-born individuals, refugees and immigrants comprise a significant portion of the county's population and of its current and future workforce. They are critical to every aspect of the local economy, working across all key industries and providing the foundation for the agriculture industry, which remains crucial to the local and regional prosperity. Investments in this target group are essential to the well-being and economic vitality of the county. The WDB understands that ELLs are a diverse population with a wide range of needs. Some individuals are just learning English, while others have developed a level of fluency that enables them to take advantage of training and upskilling opportunities that will make them candidates for jobs in the region's priority sectors, which often provide better wages and career advancement potential than jobs in other industries. Imperial County's current 4-year plan recognizes the tremendous need for training to assist residents in improving their language skills. However, like border regions throughout the Southwestern United States, communities and economies in Imperial County tend to exist along a continuum of bilingualism, where it is possible and, even common, for workplaces to be 100% Spanish-speaking. This is often true in agriculture, warehousing, and some sub-sets of manufacturing, particularly in food production. Better paying jobs, such as those that exist within healthcare, government and other priority sectors, generally require a strong command of English. The WDB recognizes that many county residents need to improve their English proficiency to be eligible for employment opportunities that will provide a middle class income. However, it is often difficult to persuade adult workers of the benefits of studying English to improve career opportunities and increase their earning potential. This challenge will remain a focus of the workforce system partners. For background information on the target group and an assessment of need, please refer to descriptions provided in Attachment E.

**A. Sharing Resources and Coordinating Services for the Target Population:** The narrative that follows describes the various ways that stakeholders in Imperial County work in collaboration and partnership to address the workforce needs of immigrants, refugees and English language learners. Imperial County WDB plays a central role in coordinating agencies, programs and employment-related resources.

**B. Increasing Access to Sector Pathway Programs:** Stakeholders continue to emphasize the importance of English language skills acquisition and the positive effects of English fluency on one's earning potential and ability to advance in a career path. English-as-a-Second Language (ESL) training is available through agencies that comprise the adult education consortium and through local community-based organizations. While assisting English language learners in improving their fluency and attaining academic credentials is fundamental to increasing their prospects for well-paid jobs, for most in this target group, the need to earn a family-supporting income is critical. Imperial County workforce system partners (including the AJCC, education providers and CBOs) recognize that this target group needs long-term interventions that will include on-ramps and off-ramps from education to better jobs and careers. While many immigrants in Imperial County have worked in agriculture, workforce system partners are successful in assisting job seekers find entry-level employment in other priority sector careers. Industries where immigrants and those learning

English are experiencing success include manufacturing, transportation/logistics and, to a lesser extent, construction, all of which offer a path to good wages with minimal time spent in formal training.

**C. Ensuring the Availability of Support Services:** The AJCC staff assesses each participant's need for services to support their participation in training and job search and their success on the job. The target population is diverse, ranging from those who completed college in their home countries, to immigrants with low literacy in their native languages. And, while economic circumstances may vary, the vast majority of individuals in the target group are low income and they generally have limited skills with which to compete in the labor market. Because of limited resources and the frequent need to participate in multiple activities and services, access to various forms of support can be critical. In addition to utilizing a portion of Imperial County's WIOA Title I allocation to provide a variety of support, AJCC staff works closely with partners to secure support services for customers. Public agencies are critical partners in providing support services to job seekers served by the AJCCs and other organizations that make up the local workforce development system. Among these are the county's Department of Social Services; Public Health Department; Behavioral Health Department; Imperial Valley Transit; and Imperial Valley Housing Authority. Supplementing these services is a network of non-profit organizations including: Imperial Valley Food Bank; the LGBT Center; SER-Jobs for Progress; United Way; Calexico Neighborhood House; and the Sister Evelyn Mourey Center, which provides emergency shelter, food and clothing. Faith-based organizations are also crucial partners. Justice for Our Neighbors, a project of the United Methodist Immigration Ministry, provides a wide range of services, such as: legal services, and assistance to the asylum-seekers and undocumented children.

**D. Promoting Retention in Training, on the Job and in Career Path Progression:** The keys to promoting the progression of immigrant job seekers into self-sustaining and family-supporting careers are: career information; career planning; and the availability of flexible and modular services offering a variety of on- and off-ramps. The workforce system partners and allied stakeholders all recognize the need to balance the immediate income needs of the target group with their need to build language and technical skills that will qualify them for well-paid jobs. Developing this balance starts by making available comprehensive information about the labor market and careers in the region. Using this information, stakeholders assist customers in devising long-range career plans, which may include multi-year, multi-step processes to gain work experience and develop technical skills. The more flexible and diverse services are, the greater the likelihood that participants will remain engaged or periodically re-engage over the long-term. Community-based and education partners offer resources for such engagement. The availability of training and services during the evening, on weekends, during agricultural "slow-down" periods and at remote locations all contribute to customers taking advantage of services over time.

**E. Coordination and Alignment with Other Plans and Planning Partners:** The local workforce services plan most closely aligned to the mission and objectives of the Imperial County WDO and the local workforce system is the 2018-2019 Annual Plan update to the Three-Year Plan of the Imperial County Adult Education Consortium. The Consortium's plan update provides the following information with regard to the ELL and immigrant target population:

- Key accomplishments in 2017-18 included: increased courses and class offerings in the areas of ESL and HSE/HSD; continued provision of courses to assist adults learning English to support their children in school, and/or gain/advance in employment and education opportunities and acquisition of US citizenship; increased offerings for ESL students to learn skills to obtain employment or open small businesses; and implementation of instruction in the area of EL Civics to help students understand and navigate governmental, educational, workplace systems and key institutions, such as banking and healthcare.
- As the consortium is gearing up for the development of a new three-year plan, one of its priorities is the continued use of local data regarding the high need for ESL and HSD/HSE, as well as feedback from students and stakeholders regarding new programs that are appropriate to meet the unique needs of the community.
- Among the new strategies and budget priorities for the current year are: collaborating with community agencies to promote local adult education programs to increase knowledge of offerings in ESL and HSD/HSE; and focusing on leveraging resources to provide foundational courses to support adult learners to learn English, earn their High School diploma or equivalency and provide workforce preparation.

**F. Coordination with the National Farmworker Jobs Program:** The Center of Employment Training (CET) is the WIOA Section 167 grantee in Imperial County. In 2016, CET, along with the other AJCC partners, entered into a new MOU with Imperial County WDB. CET is a private, non-profit organization offering open-entry employment training and has a proven track record of excellence over decades of partnering with the farmworker community. Programs in

vocational training, ESL, and GED preparation emphasize the development of locally marketable skills with a philosophy of educating the whole person, maximizing self-sufficiency, and decreasing dependency on other direct aid programs. CET also offers referrals for child care while parents are working, supportive services for food and health care, legal services, and immigration and citizenship guidance. In Imperial County, CET operates from a 14,000 sq. ft. campus in El Centro. From this location, CET offers vocational training for the following occupations: Accounting Clerk, Green Building/Construction Skills, Truck Driver, Welding Fabrication, and Retail Operations Specialist, with the last two being WIOA Eligible Training Provider List-approved courses with the WDB. Per the terms of the current MOU, referrals between CET's WIOA Section 167 programs and services and those of the WDB and other partners are made through established referral forms and procedures. Through its other locations (such as Northern California), CET provides additional services, such as an immigrant and citizenship program, which is accredited by the U.S. Department of Justice.

**G. Recognizing and Replicating Best Practices:** The stakeholders in Imperial County recognize that addressing the needs of a large and very diverse immigrant population is challenging. Government and community organizations are adept at pooling resources, making cross-agency referrals and otherwise collaborating to meet basic and social service needs. As indicated, the workforce development partners rely substantially on support providers to address basic needs, so that residents are sufficiently stable to pursue job training and career development services. Stakeholders suggest that the key to moving large numbers of individuals from low wage employment to better opportunities will be developing and offering more modular and stackable credential programs, where those working full-time or seasonally can acquire skills for employment and return later to build upon these skills. Without exception, the partners agree that increasing English fluency is foundational to career opportunities and advancement. Identifying new and better ways to teach English to the target population remains a regional and local priority.

## **VI. OTHER MODIFICATIONS TO IMPERIAL COUNTY WDB 2017-2021 LOCAL PLAN**

While not a requirement of the biennial modification, Imperial County WDB is taking advantage of the option to address "*other factors affecting the implementation*" of our local plan. Specifically, the narrative that follows: provides a brief, updated economic forecast; addresses progress on several of the goals established in our current four-year plan; and includes summaries of several workforce priorities that emerge during the stakeholder and community engagement process conducted in conjunction with the development of this modification.

**A. Imperial County Economy<sup>1</sup>:** As virtually every workforce and economic plan developed for Imperial County indicates, the region has a number of economic challenges and often carries the unfortunate distinction of having the state's and, sometimes, the nation's highest unemployment rate. The unemployment rate in the Imperial County was 17.3 percent in December 2018, which is a remarkable improvement from a high of 23.6 percent in 2016. It is still much higher than most parts of California. The rate is attributable in large part to the number of seasonal workers employed in agriculture who are unemployed for several months each year. The county gained 1,300 jobs in 2017, a 2.0 percent growth rate, which is similar to other areas of the state. The county's two most prominent industries are agriculture and government, with the latter adding a significant number of jobs within recent years. Between 2018 and 2023, nearly 80% of job creation will occur in education, healthcare and government. Construction will also see some gains, as an average of 350 new housing units will be added each year through 2023. The foregoing gains are attributable to population growth due to new births (2,100 annually). Net migration will remain low, with a projected average of 220 migrants entering the county annually over the next four years.

**B. Progress on 2017-2021 Local Plan Goals:** Following is a summary of goals stated in the WDB's local plan:  
Local Area Operations and Service Delivery Goals

1. Explore opportunities to bring additional resources to the County for English language skills training.
2. Identify alternate methods and best practices in English language skills training
3. Convene training workgroup to discuss opportunities for career pathway development for regional priority sectors
4. Investigate options for using technology to reach customers at remote locations
5. Working with local economic development/community partners, consider new strategies for layoff aversion
6. Develop a plan to increase incumbent worker training
7. Further refine the roles and responsibilities of AJCC partners
8. Review and evaluate continuous quality improvement systems

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<sup>1</sup> Principally excerpted from a 2018-2023 economic forecast summary published by the California Department of Transportation.

## Goals Pertaining to Regional Coordination and Planning

1. Support sector-focused research
  2. Contribute to the development of regional sector pathways
  3. Participate in human-centered design training
  4. Support the development of an e-portal for work-based learning
  5. Support regional and statewide efforts for unifying data collection/management across programs and fund streams
- The foregoing all remain active goals under the four-year plan. The WDO, along with our system partners have made progress in several areas. In the area of operations and service delivery, we have continued to work with education agencies and community partners to identify opportunities to increase the availability and access of English skills instruction. Likewise, education agencies are working to develop additional courses and to add more capacity to programs for which there is strong labor market demand. Progress has also been made in strengthening the workforce system partnership, as co-location with the Wagner-Peyser and other programs has been completed at our comprehensive AJCC. On the regional front, we continue to collaborate with the San Diego Workforce Partnership and our Regional Organizer is doing an excellent job sharing information between the boards and identifying opportunities for our very different local workforce areas to align strategies.

**C. Emerging Priorities:** Over the course of the various community forums held to gather input on topics to be addressed in the local plan modification, several themes emerged that could be adopted as priorities for the local workforce system. The sessions were well attended and the dialog that occurred benefitted from a range of “voices” that included agencies that the WDB interacts with regularly and organizations with which we have less frequent contact. Across the range of ideas shared and opinions that were expressed, the following issues resonated throughout the discussions and are slated for further consideration by WDB leadership and system stakeholders.

**Expanding Reach to Rural Areas:** Approximately two-thirds of the County’s population resides in the four largest cities (El Centro, Calexico, Brawley and Imperial). However, more than 60,000 people live in small towns and rural communities, some of which are remote from the main population hubs. As public transportation to and from many of these communities is minimal, stakeholders suggest that workforce, education and human services agencies work together to devise strategies to increase access to services. Among the recommendations made to provide services to rural and remote areas of the county was bringing services to residents on a regular basis, so that an expectation of service availability (e.g. days, times, location) could be established. Another recommendation was to explore options to increase broadband capacity and access to the internet, so that residents could connect to services online.

**Focus on Building Customer Service and Other Soft Skills:** The need for “soft skills” – workplace-required attitudes, behaviors, characteristics and talents – applies to all workers and every target group served by the workforce system partners. However, stakeholders indicate that the need for “soft skills” development for workers in Imperial County is significant, as is the need for training in customer service skills. Greater attention needs to be given to ensuring that all workers have a strong foundation in these areas and the stakeholders agreed that new strategies and approaches to developing these skills in workers of all ages would be beneficial.

**Expand Vocational Training Options:** The Imperial County economy is becoming more diverse. While agriculture remains the base industry, more jobs are becoming available across a wide range of sectors, where industrial, mechanical and technical skills are needed. The partners agree that the WDB, public education, economic development and community-based training providers need to continue to work together to identify training needs and develop new programs, including work-based training programs.

**Make Greater Use Registered Apprenticeships:** There are several apprenticeships offered by the building trades that provide opportunities for Imperial County residents to become skilled in occupations that pay excellent wages. For example, IBEW representatives report that, after completing its 5-year apprenticeship, Electricians can earn an hourly wage of \$40 to \$50. Stakeholders agree that the workforce system should place a greater emphasis on informing and preparing job seekers to take advantage of apprenticeship opportunities.

**Explore New Methods to Broadcast Information about Services:** Perhaps more than any other area in California, a varied and multi-faceted approach to publicizing the availability of workforce development services is needed in Imperial County. Because broadcast television comes from Yuma, AZ, television is not an ideal medium for messaging to potential customers. There is no single countywide newspaper and the bilingual nature of the county has consumers split in their language preferences for receiving information. Stakeholders recommended that strategies make greater use of social media (e.g. Facebook) which reaches individuals.

## SUPPLEMENTAL NARRATIVE

### STAKEHOLDER AND COMMUNITY OUTREACH AND INVOLVEMENT IN THE TWO-YEAR REVIEW OF THE LOCAL PLAN

Imperial County WDB initiated a process for the biennial review and modification of our local plan that involved not only management and staff of our agency, but a wide range of workforce system partners, local stakeholders and representatives of the communities that we serve. The content of Imperial County WDB's Local Plan Modification has been significantly influenced by organizations and individuals that are committed to developing and maintaining a well prepared and capable workforce.

#### 1. **Overall Strategy for Community Outreach and Stakeholder Engagement to Support Modification of the Local Plan**

The primary method of obtaining community and stakeholder input on the Local Plan Modification was to invite participation in a series of five public forums. Four of the forums were focused on the principal partnerships and populations to be addressed by the Plan Modification and the fifth was a general community forum, during which participants were asked to share ideas and recommendations on priorities that should shape workforce development service delivery in Imperial County.

At the opening of each forum, participants were informed of the session's objectives, which were:

- To give stakeholders and the community the opportunity to weigh in on the needs of the target group being discussed;
- To learn from providers, stakeholders and customers about best practices in meeting service needs;
- To identify gaps in services; and
- To hear recommendations for improving the content, availability and quality of services for the target group under consideration.

#### A. ***Approach to Conducting Population/Partnership-Specific Input Sessions:***

For each of the five (5) forums, an agenda was published in advance to inform stakeholders and members of the community what, specifically, would be discussed. The sessions were, generally, scheduled for two hours. The forums addressed the following topics:

1. Collaborating with CalFresh Employment and Training Programs
2. Improving Services to Individuals with Disabilities through Competitive Integrated Employment

3. Improving Coordination and Collaboration among Stakeholders to Strengthen Services to English Language Learners, Foreign Born Individuals and Refugees
4. Strengthening Partnerships with Local Child Support Agencies to Serve Non-Custodial Parents
5. Community Forum on Local Workforce Planning

The general community forum was held after regular work hours to enable members of the community to participate.

***B. Use of an Experienced Facilitator to Guide and Support Discussion***

To promote neutrality and encourage open input during the forums, Imperial County WDB engaged David Shinder to serve as facilitator. David has more than 35 years of experience in the field of workforce development and has facilitated hundreds of forums and planning sessions in his career. He has previous experience working with Imperial County and consulted with the WDB on the development of our current 4-year plan.

***C. Capturing Community and Stakeholder Input:***

To promote contribution to the planning process by a wide range of organizations and points of view, Imperial County WDB used several methods to inform stakeholders and the community about the forums. These included:

- Direct email to partners and a broad array of stakeholders, including organizations listed in the State Board's Directory of Planning Partners
- Posting of meeting notices in the AJCCs
- Posting of the agenda and meeting notices on the Imperial County WDB website
- Posting of meeting announcements on the State Board's website (following e-mail notification to designated State Board staff)

The forums were audio recorded and the recordings were used as the basis for developing summary notes for each forum. Meeting notes are attached as exhibits to this Plan Modification.

***D. Harnessing Intelligence From On-Going Stakeholder Engagement***

The forums held as part of the process to modify and update Imperial County WDB's 2017-2021 Local Plan represent just a small part of the many ways in which the local board gathers stakeholder input on an on-going basis. Examples of other stakeholder engagement activities include cross training among the partners; participation in planning activities of system

stakeholders; and discussions occurring during meetings of the workforce development board.

**E. *Strengthening Communities of Support around Key Populations and Partnerships***

The forums held as part of the process to update and modify the Local Plan produced the ancillary benefit of fostering extensive dialog (both during the sessions and in the weeks that have followed) and support around priority populations and issues. While the Imperial County WDB brings together the mandated partners in meetings the one-stop operator, the forums have served to foster and/or strengthen partnerships on specific issues. These gatherings have included stakeholders that have not worked with one another in the past and created not only the opportunity to network, but to discuss strategies for better serving key target populations.

**2. *Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New Partnership with CalFresh***

A community and stakeholder forum on the CalFresh Employment and Training Program was held at the Imperial County Workforce Development Office/WDB headquarters in El Centro on November 1, 2018 from 9:00 a.m. until 10:30 a.m.

To promote dialog and secure feedback and recommendations from stakeholders and members of the community that participated in the forum, the following questions/talking points were presented for the group's consideration:

- Are CalFresh Employment and Training programs currently available in the local area? If so, what services are provided and which organizations are providing them?
- What types of workforce services are needed to help people receiving CalFresh succeed in the local labor market?
- What barriers to employment are faced by CalFresh recipients and what resources are available to help assist them to overcome those barriers?
- What partnerships currently exist or could be developed among the local workforce system, the county agency that manages CalFresh, and other organizations that provide or could provide services to CalFresh recipients? How do the partners work with one another and how do they share information?
- Are CalFresh recipients being referred to programs that prepare them for high demand jobs in the region's priority sectors? What services or systems are in place that could help CalFresh recipients succeed in such programs and on the job?

**A. *Outreach Activities:*** On October 22, 2018, a notice regarding the forum was placed on the Imperial County WDB website. A printed notice was posted at the Imperial County AJCCs.



- B. Efforts to Engage Required CalFresh Partners:** On October 5, 2018, direct emails were sent to CalFresh stakeholders, including those on the State Directory.
- C. Communication with the State Board regarding CalFresh Forum:** On October 22, 2018, email notification about the forum was sent to the designated contact persons at the State Board.
- D. Documentation of Efforts:** Attached are the following items that document outreach and engagement efforts on this topic.
- Exhibit A-2-a: Sample outreach-related email communication
  - Exhibit A-2-b: List of individuals and organizations invited to participate in forum
  - Exhibit A-2-c: List of individuals that participated in forum, included their contact information
  - Exhibit A-2-d: Sign-in sheet(s) for forum
  - Exhibit A-2-e: Documentation of notification on forum to State Board
  - Exhibit A-2-f: Forum agenda
  - Exhibit A-2-g: Forum presentation (PowerPoint)
  - Exhibit A-2-h: Meeting notes summarizing the content of forum discussions

**3. Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New Partnership with Imperial County Child Support Services**

A community and stakeholder forum on Partnership with Child Support to Serve Non-Custodial Parents was held at the Imperial County Workforce Development Office/WDB headquarters in El Centro on November 26, 2018 from 10:00 a.m. until 12:00 noon.

To promote dialog and secure feedback and recommendations from stakeholders and members of the community that participated in the forum, the following questions/talking points were presented for the group's consideration:

- What barriers to employment are most common among targeted NCPs?
- What are NCPs' service needs (particularly with regard to job skills and employment) and what services are currently available?
- What organizations collaborate locally to promote skills development, employment and career advancement for targeted NCPs?
- Among the NCP service partners, (e.g. Child Support, Family Court, AJCCs, training providers and community-based organizations), what referral and information sharing systems are in place?

- What strategies and tools are used to motivate and incentivize NCPs' acting on referrals, participating in training/skills development and retention in employment?
  - How can local organizations work better to ensure positive employment and career outcomes for NCPs?
- A. Outreach Activities:** On November 2, 2018, a notice regarding the forum was placed on the Imperial County WDB website. A printed notice was posted at the Imperial County AJCCs.
- B. Efforts to Engage Required Child Support/Non-Custodial Parent Partners:** On November 21, 2018, direct emails were sent to Child Support Program/NCP stakeholders, including those on the State Directory.
- C. Communication with the State Board regarding Child Support/Non-Custodial Parent Forum:** On November 2, 2018, email notification about the forum was sent to the designated contact persons at the State Board.
- D. Documentation of Efforts:** Attached are the following items that document outreach and engagement efforts on this topic.
- Exhibit A-3-a: Sample outreach-related email communication
  - Exhibit A-3-b: List of individuals and organizations invited to participate in forum
  - Exhibit A-3-c: List of individuals that participated in forum, included their contact information
  - Exhibit A-3-d: Sign-in sheet(s) for forum
  - Exhibit A-3-e: Documentation of notification on forum to State Board
  - Exhibit A-3-f: Forum agenda
  - Exhibit A-3-g: Forum presentation (PowerPoint)
  - Exhibit A-3-h: Meeting notes summarizing the content of forum discussions

**4. Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New and Enhanced Partnerships with Competitive Integrated Employment Initiative Partners**

A community and stakeholder forum on Improving Services to Individuals with Disabilities through Competitive Integrated Employment was held at the Imperial County Workforce Development Office/WDB headquarters in El Centro on September 27, 2018 from 10:00 a.m. until 12:00 a.m.

To promote dialog and secure feedback and recommendations from stakeholders and members of the community that participated in the forum, the following questions/talking points were presented for the group's consideration:

- How are DOR and the workforce system (i.e. the local Board and the AJCCs) currently working together with local partners (such as regional centers, special education and Workability programs, among others) to support the employment goals of individuals with intellectual disabilities and developmental disabilities?
- Are efforts underway for the partners to collaborate on the use of CIE for job seekers with ID/DD?
- Have discussions begun on the development of a Local Partnership Agreement to create more CIE opportunities? If not, how can this be accelerated?
- Have workforce system staff received training in serving individuals with ID/DD and are they knowledgeable about programs and services available to assist this target group? What additional training and information is needed?
- How are DOR and the local workforce system working together to outreach to employers and partners to support individuals with ID/DD in achieving CIE? If efforts are not yet underway, what will be done?
- Have recruitment, referral and employer engagement strategies been defined? If not, what is planned?

**A. Outreach Activities:** On September 17, 2018, a notice regarding the forum was placed on the Imperial County WDB website. A printed notice was posted at the Imperial County AJCCs.

**B. Efforts to Engage Competitive Integrated Employment Partners and Key Stakeholders:** On September 21, 2018, direct emails were sent to the CIE partners and disability services stakeholders, including those on the State Directory.

**C. Communication with the State Board regarding Competitive Integrated Employment Forum:** On September 17, 2018, email notification about the forum was sent to the designated contact persons at the State Board.

**D. Documentation of Efforts:** Attached are the following items that document outreach and engagement efforts on this topic.

- Exhibit A-4-a: Sample outreach-related email communication
- Exhibit A-4-b: List of individuals and organizations invited to participate in forum
- Exhibit A-4-c: List of individuals that participated in forum, included their contact information
- Exhibit A-4-d: Sign-in sheet(s) for forum
- Exhibit A-4-e: Documentation of notification on forum to State Board
- Exhibit A-4-f: Forum agenda
- Exhibit A-4-g: Forum presentation (PowerPoint)
- Exhibit A-4-h: Meeting notes summarizing the content of forum discussions

5. **Specific Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB's New and Enhanced Partnerships with Organizations Serving English Language Learners, Foreign Born Individuals and Refugees**

A community and stakeholder forum on Improving Services for English Language Learners, Foreign Born Individuals and Refugees was held at the Imperial County Workforce Development Office/WDB headquarters in El Centro on October 18, 2018 from 10:00 a.m. to 12:00 p.m.

To promote dialog and secure feedback and recommendations from stakeholders and members of the community that participated in the forum, the following questions/talking points were presented for the group's consideration:

- What are the needs of individuals in this category?
- What are the principal barriers to employment faced by these individuals?
- What partnerships and collaborative efforts exist that enable local organizations to provide services to meet these needs?
- What outreach and recruitment strategies are effective in connecting individuals from these target groups to skills training and livable wages?
- What strategies are in place to provide these individuals with job skills and training that will enable them to progress into livable wage jobs and careers?
- Where do gaps in services exist for this target population and what can we do to bridge these gaps?

**A. Outreach Activities:** On October 2, 2018, a notice regarding the forum was placed on the Imperial County WDB website. A printed notice was posted at the Imperial County AJCCs.

**B. Efforts to Engage Partners and Key Stakeholders in Improving Services to English Language Learners, Foreign Born Individuals and Refugees:** On October 9, 2018, direct emails were sent to ELL and immigrant stakeholders, including those on the State Directory.

**C. Communication with the State Board regarding Forum on English Language Learners, Foreign Born Individuals and Refugees:** On October 2, 2018, email notification about the forum was sent to the designated contact persons at the State Board.

**D. Documentation of Efforts:** Attached are the following items that document outreach and engagement efforts on this topic.

- Exhibit A-5-a: Sample outreach-related email communication
- Exhibit A-5-b: List of individuals and organizations invited to participate in forum

- Exhibit A-5-c: List of individuals that participated in forum, included their contact information
- Exhibit A-5-d: Sign-in sheet(s) for forum
- Exhibit A-5-e: Documentation of notification on forum to State Board
- Exhibit A-5-f: Forum agenda
- Exhibit A-5-g: Forum presentation (PowerPoint)
- Exhibit A-5-h: Meeting notes summarizing the content of forum discussions

**6. Efforts to Outreach to the Community and Engage Stakeholders in Discussions on Imperial County WDB’s Overall Approach to Workforce Programming and Planning through a General Community Forum**

A general community forum on Local Workforce Planning was held at the Imperial County Workforce Development Office/WDB headquarters in El Centro on October 15, 2018 from 5:30 p.m. until 7:00 p.m.

To promote dialog and secure feedback and recommendations from stakeholders and members of the community that participated in the forum, the following questions/talking points were presented for the group’s consideration:

- What services and support do job seekers need to help prepare for and find work?
- What types of training are most needed in the area?
- Do people in the community have a good understanding of the programs and services that are available to assist them? If not, what is the best way to get the word out?
- Are there specific gaps between the services that are available and the services that people need? If so, how can we bridge those gaps?
- If you were writing the local workforce plan, what would your priorities be and why?

**A. Outreach Activities:** On October 5, 2018, a notice regarding the forum was placed on the Imperial County WDB website. A printed notice was posted at the Imperial County AJCCs.

**B. Efforts to Engage Partners and Key Stakeholders in Providing Input on General Workforce System Planning:** On October 5, 2018, direct emails were sent to stakeholders, including those on the State Directory.

**C. Communication with the State Board regarding General Community Forum on Workforce System Planning:** On October 2, 2018, email notification about the forum was sent to the designated contact persons at the State Board.

**D. *Documentation of Efforts:*** Attached are the following items that document outreach and engagement efforts on this topic.

- Exhibit A-6-a: Sample outreach-related email communication
- Exhibit A-6-b: List of individuals and organizations invited to participate in forum
- Exhibit A-6-c: List of individuals that participated in forum, included their contact information
- Exhibit A-6-d: Sign-in sheet(s) for forum
- Exhibit A-6-e: Documentation of notification on forum to State Board
- Exhibit A-6-f: Forum agenda
- Exhibit A-6-g: Forum presentation (PowerPoint)
- Exhibit A-6-h: Meeting notes summarizing the content of forum discussions

## **7. Publication of Draft for Public Comment**

On February 7, 2019, the Imperial County WDB opened a public comment period on the Local Plan Modification that concluded on March 8, 2019.

**A. *Notice on the Availability of the Draft Plan for Public Review and Comment:*** On February 7, 2019, Imperial County WDB placed a notice in Imperial Valley Press, informing the community of the 30-day public comment period and the availability of the plan electronically on the WDB's web site or in print at the offices of the Imperial County WDB.

Email notices about the availability of the draft were also sent to all stakeholders invited to participate in the community forums. In addition, notification on the public comment process was emailed to the designated State Board contacts.

**B. *Opportunities and Mechanisms for Public Comment:*** To ensure that comments to the plan are captured accurately, the WDB requested that all comments be made in writing. Written comments could be submitted by email to [jeffreyburquist@co.imperial.ca.us](mailto:jeffreyburquist@co.imperial.ca.us) or in print by mail or hand delivery to the Imperial County WDB at 2799 S. 4<sup>th</sup> Street, El Centro, CA 92243. Attn: Jeffrey Burquist.

**C. *Results of Public Comment:*** At the conclusion of the public comment period, a total of zero (0) comments were received. Based on these comments, the following adjustments were made to the draft Local Plan Modification:

- 0

Zero (0) number comments expressed disagreement with the Local Plan Modification. These comments are incorporated into Attachment F.

**D. *Documentation of Efforts:*** The following items document the public comment process:

- Exhibit A-7-a: Copy of notice in Imperial Valley Press, the Desert Review
- Exhibit A-7-b: Sample Email Message to Stakeholders

SUPPLEMENTAL NARRATIVE

**CALFRESH PARTICIPANTS – BACKGROUND AND ASESSSMENT OF NEED**

The information below supplements content provided in Section II of the principal narrative.

**1. Overview of the Size and Characteristics of the Total CalFresh Recipient Population**

The California Department of Social Services CalFresh dashboard indicates that, in 2017, there were 41,816 “annual average persons” in CalFresh in Imperial County. The dashboard provided the following additional statistics for the population:

Children (under age 18):	23,942
Elderly (age 60+):	3,755
ESL:	27,486
Households:	17,267
Child-Only Households (July 2017):	863
Persons in Child-Only Households (July 2017):	1,713
Program Reach Index in Imperial County 2016:	90.3%

**2. Overview of the Size and Characteristics of CalFresh E&T Participant Population**

As the CalFresh E&T program has not yet been implemented, there is no information to report concerning participant characteristics.

**3. Types of Workforce Services Needed by the Target Population**

The tremendous diversity of the CalFresh population makes it difficult to generalize about the workforce services they need. However, stakeholders engaged in the planning process provided a number of examples of services that segments of the target group likely need. These fall, generally, into three broad categories: basic education and remediation; job/technical skills training; and supportive services to enable training. In the first category, literacy and numeracy skills, GED/high school equivalency and English-as-a-Second Language (ESL) were all identified by stakeholders as needed workforce services. With regard to job skills, there was substantial agreement that both classroom-based and work-based programs have value. Stakeholders cited the need for training in job readiness skills and the importance of digital literacy skills for a population that has less access to technology than their higher income counterparts in the county. In the supportive service category, stakeholders highlighted the need for transportation and childcare services. For some CalFresh individuals, including those without access



to regular housing, basic services, such as shelter and clothing are needed. In addition to the one-stop partners, stakeholders agree that grassroots and faith-based partners are effective resources for addressing support needs.

**4. *Employment Barriers Experienced by the Target Population and Resources Available to Address Barriers***

Again, the diversity of the population suggests that virtually every type of employment barrier would be experienced by some portion of the CalFresh population. However, during the stakeholder engagement process, representatives from DSS, education, the WDB, AJCCs, and other stakeholder organizations and programs raised issues of fundamental economic security affecting this population, as many CalFresh participants in Imperial County live below the poverty level. They also identified the following as significant barriers affecting the CalFresh population and the county as a whole: lack of educational attainment and insufficient job skills; lack of information about programs and services; language barriers; cultural barriers; insufficient access to broadband; generational poverty; childcare; and transportation. Stakeholders highlighted insufficient affordable housing in the county as a factor fueling the need for emergency shelter and housing assistance. The organizations listed in the following responses provide the education, training and support services required to address and minimize or eradicate these barriers.

**5. *Collaboration between the WDB and Imperial County DSS***

The partnership among the local board, the AJCCs and DSS is well-established. DSS is a one-stop partner. An MOU has been executed between the WDB and the DSS. Referrals of CalWORKS participants between the agencies occur on a regular basis and co-enrollments are not uncommon. The partners acknowledge that replicating referral processes from other DSS programs, such as “Project Future,” could increase the number of CalFresh individuals that access workforce services from the AJCCs.

Other organizations that collaborate with DSS, the AJCCs and CalFresh include: Imperial Valley College; CET; Imperial County Office of Education; various local education agencies; and CBOs such as SER-Jobs for Progress, the Imperial Valley Food Bank, the Area Agency on Aging, and Catholic Charities.

**6. *Quality and Level of Intensity of Partner Services***

As described throughout the principal narrative, the CalFresh population is extremely diverse and participants in the program are served by the broadest possible range of public, non-profit and faith-based agencies in and around Imperial County. Most organizations serving CalFresh individuals do not use CalFresh enrollment status as a basis for eligibility/participation and do not record this data. Some programs and providers do collect information regarding their

participants' CalFresh status. For example, in PY 2017-2018, Imperial County WDB served a total of 141 CalFresh participants in our WIOA Title I formula-funded programs.

While a wide range of workforce services are available to CalFresh recipients and many of these individuals participate in AJCC and workforce system services, the stakeholders agree that efforts to refer CalFresh individuals to workforce services can be improved. Adoption of a CalFresh-specific process for DSS referrals to the AJCCs will support this effort.

## **7. *Information Sharing among Partners***

MOUs developed among the one-stop partners describe a referral process and provide for the sharing of service information between organizations assisting the same customer, when the customer provides authorization. Such information may include results of skills assessments or other evaluation of training and workforce service needs. As with all public programs, confidentiality laws prevail with regard to sharing customer-identifying data.

## SUPPLEMENTAL NARRATIVE

## UNEMPLOYED, UNDEREMPLOYED AND PAYMENT DELINQUENT NON-CUSTODIAL PARENTS – BACKGROUND AND ASSESSMENT OF NEED

The information below supplements content provided in Section II of the principal narrative.

1. **Areas of High Concentration**
2. **Percentage of Noncustodial Parents Who Are Unemployed**
3. **Percentage of Noncustodial Parents Who Are Ex-Offenders**
4. **Other Demographic Information**

According to “Preliminary Performance Data Federal Fiscal Year 2018” prepared by the Performance Analysis Branch of the California Department of Child Support Services, in 2018, Imperial County’s Child Support Services caseload was 10,206, of which 9,342 (91.5%) had orders. Other data and information about the target group includes:

<b>Total Paternities Established During the Year:</b>	<b>1,102</b>
<ul style="list-style-type: none"> <li>• <i>Established Judicially:</i></li> <li>• <i>Voluntary Paternity Acknowledgements:</i></li> <li>• <i>Births to Unwed Parents:</i></li> <li>• <i>Paternity Establishment Percentage:</i></li> </ul>	275 827 1,380 79.9%
<b>Children in IV-D Cases with Paternity Established or Acknowledged:</b>	<b>8,406</b>
<b>Current Support Due:</b>	<b>\$25,153,139</b>
<ul style="list-style-type: none"> <li>• <i>Current Support Distributed:</i></li> <li>• <i>Percent of Collections on Current Support:</i></li> </ul>	\$17,137,291 68.1%
<b>Cases with Arrears Due:</b>	<b>8,263</b>
<ul style="list-style-type: none"> <li>• <i>Cases Paying Towards Arrears:</i></li> <li>• <i>Percent of Cases with Collections on Arrears:</i></li> </ul>	5,382 65.1%
<b>Children in IV-D Cases</b>	
<i>Cases:</i>	10,313
<i>Children in IV-D Cases:</i>	11,280
<b>Local Agency Support Distributed by Case Type:</b>	<b>\$18,091,021</b>
<i>Current:</i>	\$1,848,719
<i>Former:</i>	\$9,465,618
<i>Never:</i>	\$6,776,684
<b>Local Agency Arrears Due by Case Type:</b>	<b>\$155,810,662</b>
<i>Current:</i>	\$16,407,508
<i>Former:</i>	\$116,223,959

Please note that information on employment and offender status were not available from published sources.

Cases are likely concentrated in the county's main population centers: the cities of El Centro, Calexico, Brawley and Imperial.

**5. *Types of Services Needed by the Targeted Population***

As described in the principal narrative, those identified as unemployed, underemployed and payment delinquent NCPs have diverse backgrounds and circumstances. Therefore, the services they require would include those that are most needed by the full range of job seekers who utilize the workforce system's services. These include good information (provided via a structured orientation process) about WIOA and other workforce services and the benefits they offer; access to and support with labor market analysis and career exploration; development of service plans and career planning support; information on and referrals to training programs; assistance in accessing supportive services; individualized guidance and counseling; and job placement assistance. The relative importance of each service will vary from participant to participant, depending on individual background and circumstances.

**6. *Services Currently Being Provided and How the Workforce-Child Support Partnership Will Modify Types and Quantity of Services Provided***

Within the principal narrative, it is clarified that, although a process exists to make referrals from CSS to the AJCCs, added structure will likely lead to referrals being more effective and resulting in more NCPs enrolling in workforce services and becoming employed. Therefore, the enhanced workforce-child support partnership described in this Local Plan Modification and the associated MOU are expected to significantly increase the number of individuals served and the workforce and support services available to them from the workforce system partners.

**7. *Barriers Experienced by Child Support Program Participants and Resources to Address Barriers***

As stated above, there is no specific set of barriers faced by targeted NCPs, as they come from diverse backgrounds and have a wide range of challenges. Each individual will be assessed as to his/her unique circumstances and as barriers are identified, so too will resources to address them. For example, individuals with disabilities may be referred to DOR representatives for additional assessment and access to unique support services, such as assistive technology or help with other workplace accommodations. Individuals with basic skills deficits will be referred to local adult education agencies or other partners, and participants lacking work skills may be referred to classroom or work-based programs where they can acquire such skills.

**8. *Planned Information Sharing to Evaluate Need***

The updated MOU to be developed by the WDB and Imperial County CSS will spell out confidentiality requirements associated with the administration of Child Support Title IV-D Programs. Representatives of CSS acknowledge that provisions of California's Family Code prohibit the agency's providing information about CSS customers to outside programs other than the County Department of Social Services. Therefore, the partners will implement a process, whereby, once participants sign an NCP Consent and Release Agreement, Child Support Services and AJCC representatives can exchange information (within guidelines) about participant needs, services and outcomes, including employment resulting from participation.

**SUPPLEMENTAL NARRATIVE**  
**ENGAGEMENT WITH THE LOCAL**  
**COMPETITIVE INTEGRATED EMPLOYMENT PARTNERS**

The information below supplements content provided in Section III of the principal narrative.

***1. Engagement with Local Partners to Increase Competitive Integrated Employment for Jobseekers with Intellectual or Developmental Disabilities***

During the course of reviewing and modifying our 2017-2021 Local Plan and as a result of our community and stakeholder engagement process, Imperial County WDB and partners within the local workforce system have developed a clear understanding of the goals set at the state level by the State Department of Rehabilitation (DOR), the Department of Developmental Services (DDS) and the State Department of Education (DOE) in connection with their agreement to increase competitive integrated employment (CIE) opportunities for individuals with intellectual or developmental disabilities (ID/DD). We became familiar with the CIE Blueprint and with the guidance the state agencies have provided to their local counterparts with regard to the development of Local Partnership Agreements (LPAs) to support the expanded use of CIE throughout California.

As described in the principal narrative pursuant to State guidelines, Imperial County WDB convened stakeholders from the disability services community as part of the process to modify and update the Local Plan. Among those participating in this discussion were the LPA core partners. In addition, a wide range of community agencies and workforce systems partners, all of whom are presumed stakeholders in the LPA, attended the forum. All agreed that increased participation from the WDB and the AJCCs would bring valuable resources to the partners' efforts to increase the use of CIE.

AJCC staff already collaborates with the LPA partners to varying degrees. Presently, the relationship with DOR is strong and the partners cite numerous examples of collaboration, co-enrollment, joint case management and other efforts by the workforce system and DOR to serve individuals with disabilities. WIOA Youth Programs also have a history of collaboration with the Workability I programs operated by local education agencies. As stated, linkages with the Regional Center are not as well established. The workforce system has relatively little experience working with individuals with ID/DD, which is the group principally served by California's regional centers. The CIE initiative provides the impetus for change in this area and the WDB and Regional Center representatives agree that the workforce system's extensive connections within the business community will be extremely valuable to the LPA partners in their efforts to expand CIE for the target population.

The WDB will work with the LPA partners to develop and implement a plan for the WDB’s support for CIE expansion. This plan will be finalized no later than July 1, 2019.

**2. Competitive Integrated Employment Partners**

The parties to the LPA are the following partners:

DOR District Office	Inland Empire District Office (El Centro Branch)
Regional Center	San Diego Regional Center (Imperial County Office)
Local Education Agencies (core partners)	Imperial County Office of Education (COE) – SELPA (representing special education and Workability I programs of the COE and 16 school districts)

It is anticipated that the LPA, once finalized, will also acknowledge the roles and responsibilities of community partners, such as the WDB and our network of AJCCs.

**3. Planned Coordination with the CIE Local Planning Agreement Partners**

As described throughout the principal narrative and in the preceding responses, Imperial County WDB is fully committed to participating as a stakeholder in the efforts of the CIE LPA. We anticipate being actively involved working with DOR, its service providers, the regional center and local education agencies’ Workability I programs to provide career services to job seekers with ID/DD; supporting DOR in using an assets-based approach to promoting CIE to local businesses through a messaging campaign and direct contacts; and working with DOR and other stakeholders to encourage businesses to take advantage of work-based learning strategies to initially integrate individuals with ID/DD into their workforce.

As indicated, the WDB is awaiting the following critical messages from the DOR District Office relative to our support for the CIE initiative:

- Assignment of a DOR Liaison/point of contact to connect the workforce system to its community of service providers;
- Information on how DOR, in coordination with its CIE Blueprint partners, DDS and CDE, will provide CIE technical assistance to the local boards, partners, and employers to assist in filling potential knowledge gaps.
- Information on how DOR and State Board executive staff will work collaboratively to ensure that resources are available for disability expertise and cross-training of frontline staff in the AJCCs.

Once the foregoing information is available, Imperial County WDB will complete our plan to support the LPA partners in increasing CIE opportunities.

**SUPPLEMENTAL NARRATIVE**

**ENGLISH LANGUAGE LEARNERS, FOREIGN BORN INDIVIDUALS AND REFUGEES – BACKGROUND AND ASESSSMENT OF NEED**

The information below supplements content provided in Section IV of the principal narrative.

**1. Overview of Target Population Demographics**

The following workforce-related data for Imperial County’s immigrant and ELL population is excerpted from current U.S. Census Bureau estimates.

County population (est.)	182,830
White Alone percent	90%
Black or African American alone, percent	3.4%
American Indian and Alaska Native alone, percent	2.5%
Asian alone, percent	2.2%
Native Hawaiian and Other Pacific Islander alone, percent	0.2%
Two or More Races, percent	1.7%
Hispanic or Latino, percent	84.3%
White alone, not Hispanic or Latino, percent	10.6%
Foreign born persons, percent (2013-2017)	31.7%
Language other than English spoken at home, percent of persons age 5 years + 2013-2017)	76.1

Additional graphic depictions of data concerning the foreign born population of Imperial County conclude this narrative.

**2. Barriers to Employment and Specialized Needs of the Target Population**

Among the target populations’ principal barriers to employment identified by systems stakeholders, community-based organizations and workforce staff are: limited English proficiency; low cultural competency; immigration status vulnerabilities; lack of or low literacy in one’s native language; limited knowledge of and access to benefits; difficulty navigating resources; mental health; insufficient knowledge of American business norms and laws/regulations affecting the workplace; lack of educational attainment, vocational skills and credentials; insufficient digital literacy; and lack of access to affordable options for childcare and transportation. For some immigrant and refugee customers, the inability to secure credit for prior learning and educational attainment from another country is a significant barrier to employment.

**3. Identified Gaps in Workforce System Services for the Target Population**



One of the principal gaps in delivering workforce, education, training and related services in Imperial County results from where people live. While nearly two-thirds of the county's residents live within the boundaries of the county's four largest cities (El Centro, Calexico, Brawley and Imperial), where most services are located, the remaining population of approximately 60,000 people is dispersed across a large area comprised of a few towns and many very small rural communities and census designated places. People tend to live where they have work, so most are unable to travel long distances to services during non-work hours. Reaching individuals in these communities was a topic that came up repeatedly during the stakeholder engagement process and was identified as a priority by partners throughout discussions on customers' barriers, service needs and gaps in service delivery. The Imperial County WDB recognizes the need for workforce service in remote areas of the county and has established satellites in Winterhaven and Calipatria, which operates on a part-time basis. Partners such as CET, the WIOA Section 167 grantee, are accustomed to taking information and services to farmworkers where they live and work. Discussions with stakeholders revealed that others too use this strategy, as the immigrant population living and working in remote communities are constrained by financial resources in their ability to travel throughout the county for services. Working together on strategies to periodically bring mobile services to remote communities was recommended. In addition, some stakeholders suggest that increases in broadband and digital services will make reaching those in remote locations more feasible.

Stakeholders also identified the need for: increased ESL capacity; more bilingual services; greater cultural awareness and cultural responsiveness; increased digital literacy; increased focus on acculturation; assistance in navigating American society and government institutions; and more training programs. The WDB will continue to engage with workforce system partners and stakeholders to identify strategies to address these gaps.

#### **4. *Outreach and Recruitment Strategies for the Target Population***

As discussed in the principal narrative, the use of mass media outlets to reach immigrants and others in the target groups can be difficult in Imperial County because the "service area" for these outlets reaches a broader geographic area than the county, including Arizona and Mexico. Dialog among the partners touched on virtually every form of media, with representatives of education agencies and service providers noting that all produce results with varying degrees of success. A number of stakeholders provided input suggesting that those most in need of services are individuals with very low literacy and very limited English fluency. Such individuals tend to stay within communities and are, generally, not receptive to messages from organizations within which they have had little contact. Therefore, partners encouraged the use of grassroots strategies, wherein information is taken into communities via contact with churches and a presence at community events. These on-on-one contacts produce the greatest results,

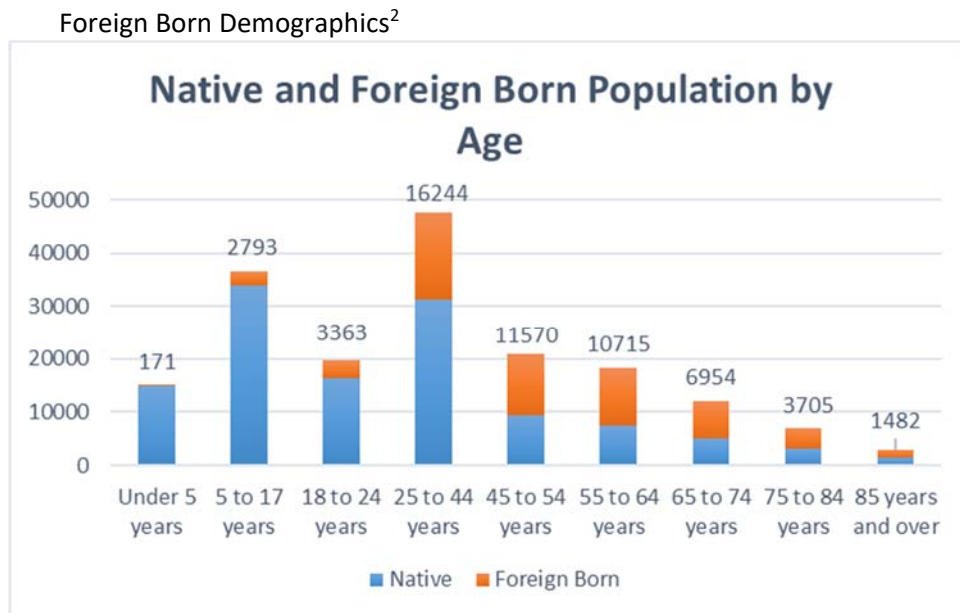
particularly when followed by a warm hand-off to a designated person at an AJCC or other service provider location.

**5. Coordination and Alignment among Partners in Serving the Target Population**

Principal workforce partners and relationships focused on the serving immigrants and ELL customers are described throughout the modification narrative. These include the WDB: the county’s network of full-service and satellite AJCCs; EDD’s programs serving farmworkers; CET; and key education partners, including Imperial Valley College and adult education programs located throughout the county. Other important partners in serving the target population are: SER – Jobs for Progress; Sister Evelyn Mourey Center; Consul de Comunidades (Mexican Consulate) and United Methodist Immigration Ministries, among others.

**6. Data Concerning Foreign Born Individuals in Imperial County**

The following graphics depict employment related characteristics of foreign born individuals in the county.

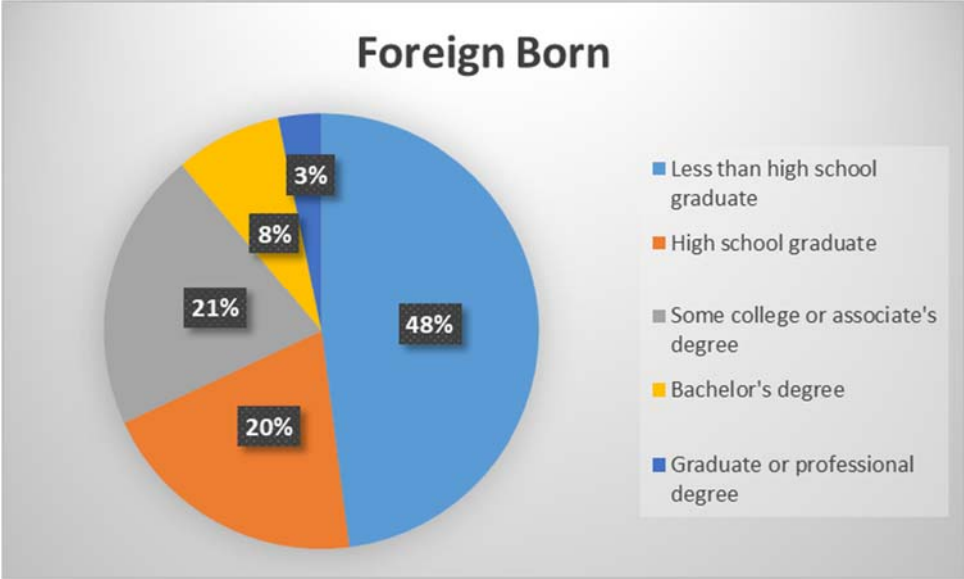


There are approximately 56,997 Foreign Born in Imperial County.

Foreign Born Educational Attainment<sup>3</sup>

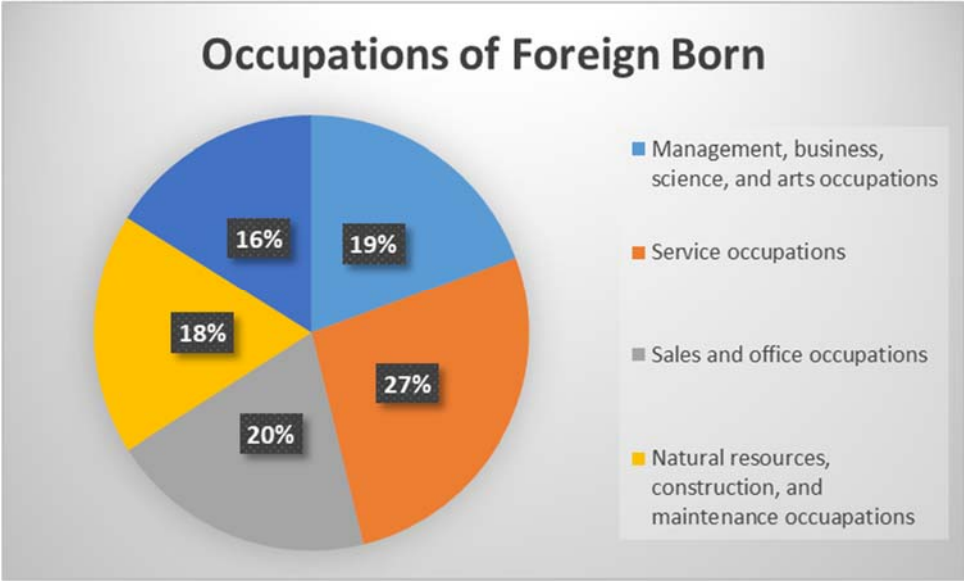
<sup>2</sup> ACS 5-year estimates

<sup>3</sup> ACS 5-year estimates



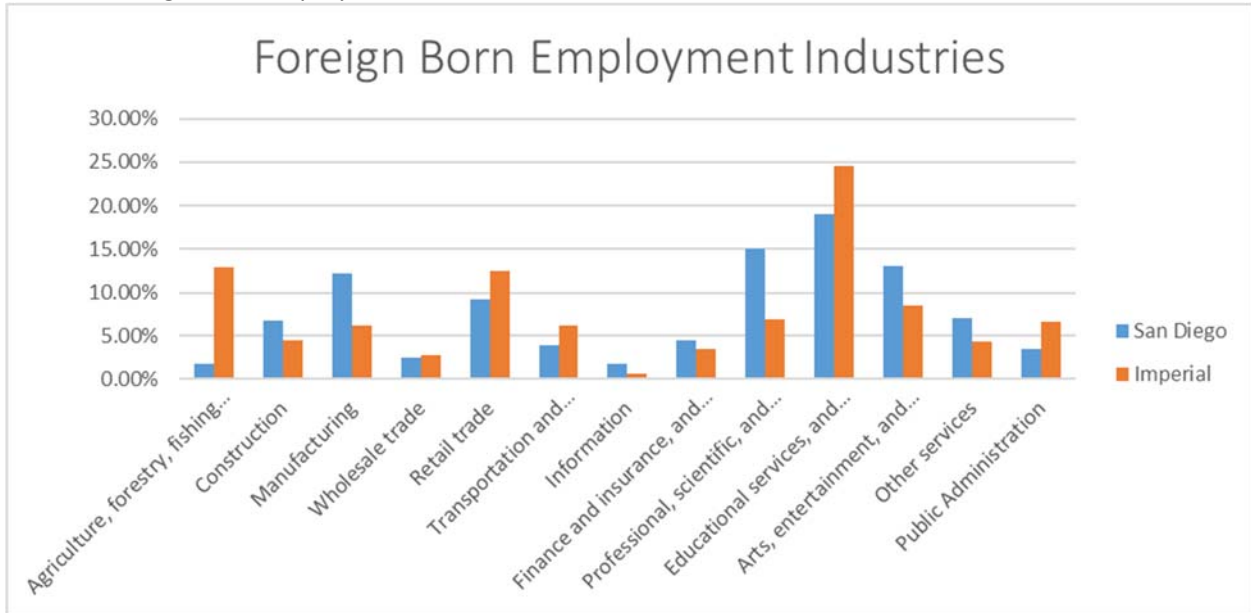
Out of an estimated 50,631 Foreign Born over the age of 25, 48% have less than a high school degree.

Foreign Born Employment Occupations<sup>4</sup>



<sup>4</sup> ACS 5-year estimates

Foreign Born Employment Industries<sup>5</sup>



Refugee Arrivals, SIV Arrivals, Asylees and Entrants, and Employment Services served: 0<sup>6</sup>

Refugee Arrivals into Imperial 2012-2016: 10<sup>7</sup>

School Districts in Imperial (2015)<sup>8</sup>

- Total Students enrolled: 37,279
- Number of LEP students enrolled: 15,134
  - LEP 59%
  - Non-LEP 41%

<sup>5</sup> ACS 5-year estimates (see spreadsheet for entire Industry names)

<sup>6</sup> California Department of Social Services-Refugee Programs Bureau. "FFY 2017 Refugee Population Data Snapshot by County." California Refugee Arrivals Data

<sup>7</sup> California Department of Social Services-Refugee Programs Bureau. "Refugee Arrivals Into California By Country/Region of Origin: Federal Fiscal Years 2012 through 2016."

<sup>8</sup> Civil Rights Data Collection. Detailed Data Tables

SUPPLEMENTAL NARRATIVE

PUBLIC COMMENTS IN DISAGREEMENT WITH LOCAL PLAN

A total of zero (0) comments were received in response to the publication of a draft of the Imperial County WDB's 2019 Local Plan Modification during an open public comment period. Following are comments in disagreement with the draft plan, listed in the order in which they were received.

1.	Commenter:	
	Date Received:	
	Method By Which Comment Communicated:	
	Comment:	

2.	Commenter:	
	Date Received:	
	Method By Which Comment Communicated:	
	Comment:	

3.	Commenter:	
	Date Received:	
	Method By Which Comment Communicated:	
	Comment:	