

Greater Nebraska Workforce Development Area – Local Plan

**PY25 – PY28
(July 1, 2025 – June 30, 2029)**

Greater Nebraska Plan Contents

1. The local plan must include the following strategic planning elements described in WIOA Secs. 108(b)(2)-(21).	4
a. description of the workforce development system in the local area that identifies:	4
i. programs included in the system	4
ii. how the local board will support the goals and strategies identified in the state plan.	6
iii. how the local board will work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC 2301 et seq.) to support service alignment	7
b. description of how the local board will work with entities carrying out core programs (Titles I, II, III, and IV) to:	8
i. expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment;	8
ii. facilitate the development of career pathways and coenrollment in core programs;	9
iii. improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable);	9
c. description of strategies and services that will be used in the local area;	9
i. to facilitate engagement of employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations;	9
ii. to support a local workforce development system that meets the needs of businesses in the local area;	10
iii. to better coordinate workforce development programs and economic development;	12
iv. to strengthen linkages between the one-stop delivery system and unemployment insurance programs; and	12
v. that may include the implementation of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies designed to meet the needs of regional employers. these initiatives must support the strategies described above in paragraphs i. through iv.;	13
d. description of how the local board will coordinate local workforce investment activities with regional economic development activities that are carried out in the local area and how the local board will promote entrepreneurial skills training and microenterprise services;	14
e. description of the local one-stop delivery system, including;	14
i. how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local employers, workers, and job seekers;	14
ii. how the local board will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and other means;	15
iii. how entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA Sec. 188 and applicable provisions of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities;	16
iv. roles and resource contributions of the one-stop partners;	16
f. description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area;	18
Table 3. Basic career services available for adult and dislocated worker program participants	18
Table 4. Individualized career services available to adult and dislocated worker program participants	19
Follow-up services	20
Training activities	20
g. description of how the local board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities;	20
h. description and assessment of the type and availability of youth workforce investment activities in the local area including activities for youth who are individuals with disabilities, which must include an identification of successful models of such activities;	20
Table 5. Youth program services	20
i. how the local board will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services;	21
j. how the local board will coordinate Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area;	21
k. plans, assurances, and strategies for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act (29 USC 49 et seq.) services and other services provided through the one-stop delivery system;	22
l. Describe how the local board will coordinate Title I workforce investment activities with adult education and literacy activities authorized under Title II, which must include a description of how the local board will carry out the review of local applications submitted under Title II consistent with WIOA Secs. 107(d)(11)(A) and (B)(i) and WIOA Sec. 232;	22
m.. copies of executed cooperative agreements which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local one-stop delivery	

system, including cooperative agreements (as defined in WIOA Sec. 107(d)(11)) between the local board or other local entities described in WIOA Sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 USC 721(a)(11)(B)) and the local office of a designated state agency or designated state unit administering programs carried out under Title I of the Rehabilitation Act (29 USC 720 et seq.) (other than Sec. 112 or Part C of that Title (29 USC 732, 741) and subject to Sec. 121(f) in accordance with Sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination;	23
n. identification of the entity responsible for the disbursement of grant funds described in WIOA Sec. 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under WIOA Sec. 107(d)(12)(B)(i);	23
o. description of the competitive process that will be used to award the subgrants and contracts for Title I activities;	23
p. description of local levels of performance negotiated with the Governor and chief elected official consistent with WIOA Sec. 116(c), to be used to measure the performance of the local area and to be used by the local board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under Title IB, and the one-stop delivery system in the local area;	23
Table 6. Negotiated levels of performance for Greater Nebraska's Title I adult program, PY24 and PY25	24
Table 7. Negotiated levels of performance for Greater Nebraska's Title I dislocated worker program, PY24 and PY25	24
Table 8. Negotiated levels of performance for Greater Nebraska's Title I youth program, PY24 and PY25	24
q. description of actions the local board will take toward becoming or remaining a high-performing local board, consistent with the factors developed by the state workforce development board;	24
r. description of how training services outlined in WIOA Sec. 134 will be provided through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter, and how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided;	24
Individual Training Accounts (ITAs)	24
Contract exceptions to use of ITAs	25
GNWDB processes for evaluating use of contracted training providers/programs in lieu of ITAs with ETPL providers	25
Consumer choice	25
s. description of the process used by the local board, consistent with WIOA Sec. 108(d), to provide a 30-day public comment period prior to submission of the plan, including an opportunity to have input into the development of the local plan, particularly for representatives of businesses, education, and labor organizations;	26
t. description of how one-stop centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by one-stop partners; and	26
u. description of the direction given by the Governor and the local board to the one-stop operator to ensure priority for adult career and training services will be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA Sec. 134(c)(3)(E) and 20 CFR § 680.600.	27
2. Pursuant to WIOA Sec. 108(b)(22), the local plan must include the following descriptions of local policies, procedures, and processes relating to:	27
a. priority of service within the local one-stop delivery system for Veterans and covered persons;	27
b. priority of service under Title I programs;	27
Title I adult program	27
Title I dislocated worker program	28
Title I youth program	28
c. Title I supportive services;	28
d. Title I follow up services;	29
Adults and dislocated worker participants	29
Youth participants	29
e. Title I incumbent worker training; and	30
IWT overview	30
IWT funding	30
f. Title I program waitlists.	31
3. Comments submitted during the local-plan public comment period must be submitted with the local plan if they represent disagreement with the proposed plan.	31

1. The local plan must include the following strategic planning elements described in WIOA Secs. 108(b)(2)-(21).

a. description of the workforce development system in the local area that identifies:

i. programs included in the system

Required one-stop programs

1. WIOA Title IB adult and dislocated worker programs (colocation)
2. WIOA Title IB youth program (colocation)
3. WIOA Title ID Native American programs:
 - a. Ponca Tribe (direct linkage)
 - b. Winnebago Tribe (direct linkage)
4. WIOA Title ID Migrant and Seasonal Farmworker Program
 - a. Proteus (direct linkage)
2. WIOA Title II Adult Education and Family Literacy Act program
 - a. Nebraska Department of Education (direct linkage)
5. WIOA Title III: Wagner-Peyser Employment Service
 - a. Nebraska Department of Labor (colocation)
6. WIOA Title IV: Vocational Rehabilitation
 - a. Nebraska Commission for the Blind and Visually Impaired (colocation and direct linkage)
 - b. Nebraska VR (colocation and direct linkage)
7. Career & Technical Education (direct linkage)
 - a. Central Community College
 - b. Mid-Plains Community College
 - c. Northeast Community College
 - d. Southeast Community College
 - e. Western Nebraska Community College (direct linkage)
8. Community Service Block Grant (CSBG) programs (direct linkage)
 - a. Blue Valley Community Action
 - b. Central Community Action Partnership
 - c. Community Action Partnership of Mid-Nebraska
 - d. Northeast Nebraska Community Action Partnership
 - e. Southeast Nebraska Community Action Partnership
9. Jobs for Veterans State Grant program
 - a. Nebraska Department of Labor (colocation and direct linkage)
10. Senior Community Services Employment Program (colocation and direct linkage)
 - a. Nebraska Department of Labor
 - b. National Able Network
11. Temporary Assistance for Needy Families (TANF) Employment First Program (colocation and direct linkage)
 - a. Nebraska Department of Health and Human Services
 - b. Equus Workforce Solutions
12. Trade Adjustment Assistance (TAA) program:
 - a. Nebraska Department of Labor (colocation and direct linkage))
13. Unemployment Insurance (UI)
 - a. Nebraska Department of Labor (colocation and direct linkage)

Additional one-stop partners:

1. Supplemental Nutrition Assistance Program (SNAP)
 - a. Nebraska Department of Health and Human Services (colocation and direct linkage))
2. Temporary Assistance for Needy Families (TANF)
 - a. Nebraska Department of Health and Human Services (colocation and direct linkage)

Additional information concerning Greater Nebraska's one-stop delivery system

Greater Nebraska's required and additional one-stop partner programs and their service providers ensure that job seekers, workers, and employers have access to information and services that lead to positive employment and training outcomes.

Greater Nebraska AJCs and partner staff strive to:

1. provide job seekers with the skills and credentials necessary to secure and advance in employment with wages that sustain themselves and their families;
2. provide access and opportunities to job seekers, including individuals with barriers to employment, as defined in Section 3(24) of WIOA, such as individuals with disabilities, individuals who are English language learners, and individuals who have low levels of literacy, to prepare for, obtain, retain, and advance in high-quality jobs and high-demand careers;
3. enable businesses and employers to easily identify and hire skilled workers and access other human resource assistance, including education and training for their current workforce:
 - a. Examples include assistance with pre-screening applicants, writing job descriptions, offering rooms for interviewing, consultation services on topics like succession planning and career ladder development, and other forms of assistance.
4. participate in rigorous evaluations that support continuous improvement of Greater Nebraska's one-stop delivery system by identifying which strategies work better for different populations; and
5. ensure that high-quality integrated data informs decisions made by policy makers, employers, and job seekers.

In addition, Greater Nebraska staff participate in the following local partner boards and advisory groups to strengthen partnerships, bring resources together, and coordinate services:

1. Beatrice Chamber of Commerce Ambassadors
2. Buddy Check 22 (Veteran suicide prevention)
3. Career Connections Workgroup
4. CASA (Court Appointed Special Advocate) of South Central Nebraska Board
5. Cheyenne County Chamber of Commerce Ambassadors
6. Cheyenne County Chamber of Commerce Board of Directors
7. Cheyenne County Economic Development Committee
8. Columbus Public Schools Carl Perkins Advisory Committee
9. EmployGI Community Group
10. EmployKrny Community Group
11. Empowering Families Board
12. ESU Migrant Education Policy Council
13. EVETS – Eliminating Veteran Suicide through Education and Services
14. Grand Island Area Economic Development Corporation Advisory Board
15. Grand Island Community of Care
16. Grand Island Public Schools Freshman Advisory Board
17. Hastings Area Chamber of Commerce Business Industry Education
18. Hastings Chamber of Commerce Board of Directors
19. Hastings Community Impact Network
20. Hastings United Way Board of Directors
21. Kearney Chamber of Commerce Business Education Committee
22. Kearney Community Connections
23. Kiwanis Club of Scottsbluff Board of Directors
24. Leadership Beatrice
25. Leadership Norfolk
26. Leadership Scottsbluff
27. Lexington Chamber of Commerce Ambassadors
28. LifeLink Advisory Board
29. Metropolitan Community College Career Advisory Group

30. Mid-Plains Community College Information Technology Advisory Committee
31. Nebraska City Center for Children and Families Board
32. Southeast Nebraska Manufacturing Partners
33. Norfolk High School Career Academy Advisory Board
34. Norfolk High School Carl Perkins Advisory Board
35. Panhandle Area Development District Board of Directors
36. Panhandle Business and Professional Women Board of Directors
37. Sidney E3 Committee (Energizing Entrepreneurial Ecosystems)
38. Southeast Nebraska Collaborative
39. Tiny Homes for Vets
40. Western Nebraska Community College Business Resources for Entrepreneurs
41. Western Nebraska Community College Nursing Program Advisory Board
42. Western Nebraska Economic Development Interlocal
43. Western Nebraska Transition Grant Board

Oversight, monitoring, and implementation of the Greater Nebraska one-stop delivery system is the sole responsibility of the Greater Nebraska Chief Elected Officials Board (CEOB) and the Greater Nebraska Workforce Development Board (GNWDB).

Required and additional one-stop partners are not responsible for management of the Greater Nebraska one-stop delivery system. The partners are, however, responsible for implementation of their respective programs within the Greater Nebraska one-stop delivery system, according to Federal law and regulations, state policy, and their respective MOUs with the GN CEOB/local board.

The Greater Nebraska one-stop operator, regional managers (at Greater Nebraska one-stop centers), and service providers *are not* responsible for management of the Greater Nebraska one-stop delivery system. Instead, they are responsible for providing their respective services within the Greater Nebraska one-stop delivery system, according to Federal law, rules, and regulations; state policy; their respective service agreements with the CEOB and GNWDB; and legislated roles and responsibilities.

ii. how the local board will support the goals and strategies identified in the state plan.

The Greater Nebraska Workforce Development Board supports the goals and strategies identified in the state plan by participating in state-plan workgroups established by the Nebraska Workforce Development Board: Career Pathways Workgroup; System Alignment Workgroup.

Selection and prioritization of development of career pathways

State plan career pathways goal: Selection and prioritization of the development of career pathways for three or more in-demand sectors or occupations identified in Nebraska's Combined State Plan.

Greater Nebraska will use data to drive decisions when creating new and building upon existing initiatives to prepare individuals for the workforce.

The Career Pathways Workgroup identified five industry sectors that are in demand across all of Nebraska's local workforce development areas and is prioritizing these industry sectors for career pathways development:

1. Health care/medical;
2. Manufacturing;
3. Accommodation and food services;
4. Transportation, distribution, and logistics (heavy and tractor-trailer trucking, transportation, and warehousing); and
5. Construction.

The following industries were identified during the development of Greater Nebraska’s local plan in 2021:

1. Health Care and Social Assistance;
2. Manufacturing;
3. Educational Services;
4. Information Technology; and
5. additional industries essential to the economic vitality of each community.

Under this plan, Greater Nebraska revised its 2021 list to focus on the following industries to align with current Nebraska State Plan:

1. Health Care and Social Assistance;
2. Manufacturing;
3. Accommodation and Food Services;
4. Transportation, Distribution, and Logistics;
5. Construction;
6. Educational Services;
7. Information Technology.

System alignment

In Greater NE, the One Stop Operator participates in the Alignment Work group. The Greater NE administrator and the Chair of the Greater NEWFDB participate on the Career Pathways Work Group. Members actively attend all workgroup meetings and participate in the goals and strategies determined by the work group.

For the Alignment work group, all Greater NE case managers attended all statewide workforce trainings, with all WIOA partners presenting in 2023. Most recently the alignment workgroup was working on a common intake system, next steps include reviewing the system so far and obtaining feedback from partners for improvements.

To advance career pathways in Greater NE we are working with high schools and colleges to create pathways to registered apprenticeship programs. Central Community College, Northeast Community College, Southeast Community College and Western Nebraska Community College are all registered apprenticeship sponsors. Initiatives for the future include getting high schools in the surrounding area of each community college registered in partnership with their respective community college. This provides apprenticeship opportunities to high school students and allows them to continue on into a community college Apprenticeship Program.

iii. how the local board will work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC 2301 et seq.) to support service alignment.

The GNWDB System Coordination Committee acts to align and leverage services and resources of Greater Nebraska’s one-stop delivery system partners, prevent duplication of services, monitor one-stop system performance, and form strategies to ensure continuous improvement of the system. The GNWDB will convene with core programs and other One-Stop partners to work toward service alignment and creation of workforce strategies. The GNWDB Strategic Planning Committee guides employer engagement, sector strategies, and development of career pathways. Data will be analyzed regularly to drive decision making and goal setting.

Greater Nebraska staff participate in EmployNebraska groups throughout Nebraska, which brings business service teams from core partners together to work toward a common goal. These groups meet regularly to identify employer, job seeker, and community needs; develop strategies to address barriers faced by employers and job seekers; and work toward system alignment and coordination for programs and services targeting employers.

Greater Nebraska partners with the Career and Technical Education providers through area schools to support CTE programs and activities. Greater Nebraska Title I coordinate workforce services geared toward Nebraska secondary and postsecondary schools with Nebraska Department of Education (NDE) under the Carl D. Perkins Career and Technical Education act. The Nebraska Department of Education reVISION program links schools with career

education and industry professionals, providing educators with the support and resources needed to implement and adjust curriculum to meet the needs of the workforce in a changing economy. Greater Nebraska will continue to support NDE programming, including the promotion and alignment of programs targeting occupations leading to family-sustaining wages, as outlined in the Nebraska Perkins V State Plan. Several strategies include:

1. industry sector partnerships;
2. public sector partnerships;
3. promoting career pathways, including career readiness;
4. focusing on high-demand industry sectors and occupations during the provision of career services;
5. increasing co-enrollment of program participants and coordinating funding across partner programs;
6. expanding work-based learning opportunities, including apprenticeships; and
7. implementing joint partner initiatives.

As a result of the reVISION project, Grand Island Northwest High School implemented an onsite CNA program to train students in a medical pathway, allowing students the opportunity for onsite training and potential work-based learning opportunity with the support of WIOA funds. This partnership continues to strengthen through collaboration between the Title IB Youth team, local ESUs, and the Nebraska Department of Education/CTE Division to bring youth services related to work experience, OJT, apprenticeship, etc.) and training to partner schools.

b. description of how the local board will work with entities carrying out core programs (Titles I, II, III, and IV) to:

i. expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment;

The GNWDB will utilize data, in addition to state, regional, and local plans to drive initiatives for expansion, including strategic coordination with core programs. It is the position of the GNWDB that full integration of services is key to expanding access. The Greater Nebraska North Platte office has implemented a “light case management” model across all onsite programs to increase staff awareness of job seeker needs and knowledge of available resources. All staff have received training and been empowered to meet one on one with an individual to determine basic eligibility and make referrals. Staff are specifically trained to notice when an individual is struggling or may benefit from an evaluation. Greater Nebraska continues to work to expand this model and establish full integration through technology, comprehensive cross training, and streamlined co-enrollment processes.

While much of Nebraska is within commuting distance of a one-stop center, there are several counties that are underserved. Greater Nebraska staff have been fully equipped with laptops and have greater mobility to provide Title I and Title III services within these counties. This extension of services will be done in collaboration with Title II and Title IV programs, as well as all partners throughout the Greater Nebraska service delivery area to capitalize on the strengths and capacity of all core partners. Title II provides services to all counties across Nebraska through in-person classes, remote learning and distance education curricula providing easy access to adult education. The one-stop operator has focused heavily on partnership development with the Nebraska Library Commission to identify high need areas and establish a working relationship to increase service delivery through local libraries in underserved communities.

The GNWDB will also work with core programs to utilize partnerships with other partner programs to expand access. Initiatives will include:

1. Bring Up Nebraska – Partnerships with community collaboratives under the Bring Up Nebraska umbrella will continue to be strengthened to provide services to individuals in need of income stability. Greater Nebraska recently participated in the Bring Up Nebraska State Plan development to identify areas where workforce could support the goals of the initiative.
2. Expansion of the Columbus WIOA/SNAP partnership to include TANF – this expanded case management model will provide participants true wrap around services and a team focused on their individual and family self-sufficiency. This partnership has been expanded to the North Platte teams as well. The one-stop operator is currently working on development of a Standard Operating Procedure between Greater

Nebraska Title IB, Wagner-Peyser, and TANF to formalize the partnership and provide guidance to the teams on how to implement joint goals and coordinate service delivery.

3. Reentry – Staff have been trained by the Nebraska Department of Correctional Services and cleared to expand service offerings within the walls of the institutions. Greater Nebraska staff have implemented services in several NDCS facilities in collaboration with community reentry partners. Service expansion and partner collaboration will continue to be developed and expanded to other areas.
4. Homeless services – The GNWDB will work with local area Continuum of Care partners to coordinate workforce offerings in support of the State of Nebraska Consolidated Plan for Housing and Community Development. Collaborative efforts have taken place in the local offices and continue to be expanded. Greater Nebraska's Grand Island team has a staff member on the local Continuum of Care advisory group. With the State level MOU between workforce and homeless services currently on hold, Greater Nebraska will work to move forward at a local level in anticipation of future guidance.

ii. facilitate the development of career pathways and coenrollment in core programs;

The GNWDB will work with partners to determine development and prioritizations of career pathway initiatives, in addition to convening Greater Nebraska staff, partners, and other stakeholders to address barriers to participation for both job seekers and employers. Greater Nebraska will work toward identification and implementation of best practices for both development of career pathways and co-enrollment.

Greater Nebraska will utilize the Business Services Team, consisting of both internal and partner business services reps (BSRs) to provide baseline data to the GNWDB for consideration of new or enhanced Sector Partnerships, including the development of career pathways. BSRs will provide feedback from businesses to the GNWDB to help guide decisions. Trend analysis of location quotients and other labor market data will provide the GNWDB with an indicator of the health of industries and occupations critical to the stabilization and growth of Nebraska's economy. This data will help the partners to focus efforts

iii. improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable);

The GNWDB will continue to work with local area partners, businesses, and training providers to coordinate efforts toward industry and job seeker needs. Through alignment of programs and the elimination of duplication of services, job seekers will have access to more comprehensive program assistance and supportive services. Collaboration with employers, Economic Development, and training providers will aid in the development of career pathways and programs leading to industry-valued credentials identified as essential to a stronger workforce. The Strategic Planning Committee will continue to drive discussions to identify, prioritize, and take action to address sector and career pathway needs.

c. description of strategies and services that will be used in the local area;

i. to facilitate engagement of employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations;

Employer engagement strategies will incorporate the proactive use of available workforce and industry data to help determine future industry needs, potential workforce disruptions, and to ensure the availability of a skilled workforce to drive growth within the state's high-wage, high-skill, and high-demand industries and occupations. Industry focus in Manufacturing and Healthcare will continue through the collaboration of groups such as the Central Nebraska Manufacturing Partnership and Southeast Nebraska Manufacturing Partnership. During the healthcare summit conducted as part of the APHSA technical assistance grant, Greater Nebraska has identified education of employers about services available to be a priority in order to address the top two reasons identified as a barrier to participation in career pathways:

- Lack of awareness. The majority of participating employers indicated their largest barrier in participating in workforce programs was due to the lack of knowledge that they exist.

- Lack of understanding. Several employers reported they were aware of services but did not understand how they could gain access or what support they could offer.

Greater Nebraska will utilize partnerships developed through staff participation in initiatives such as Leadership Beatrice, Leadership Norfolk, EmployBeatrice, EmployGI, EmployKrn, and others to educate business and community partners about the services offered the One-Stop and workforce development system.

Greater Nebraska has designated business services staff trained to conduct thorough employer needs assessments and provide comprehensive and strategic services, including connection with appropriate workforce development programs and service offerings. Employers are recruited and engaged through offerings including individual company account management; recruiting, screening and hiring services, assessments and training (incumbent worker, occupational skills, and on-the-job training); consulting services (labor market information); tailored workshops. Staff have expanded hiring events to include more creative offerings in response to the pandemic. Statewide, drive-thru and virtual events were held, which garnered positive responses from employers. The Greater Nebraska Beatrice office successfully held a Tailgate Job Fair in coordination with Department of Health and Human Services and will continue this offering seasonally. These hiring events continue throughout Greater Nebraska. In addition, staff also work with employers to capitalize on in person hiring events by assisting them with identifying screening processes and interview components that can be conducted during events. This new strategy has resulted in attendees walking away with job offers, which in turn drives up attendance at future events.

There is a need for more specialized training, particularly in the development of strategies to respond to more localized issues, including layoff aversion. Incumbent worker training and customized training are largely underutilized in Nebraska despite a low unemployment rate that makes it difficult for employers to find qualified workers. Greater Nebraska has updated policies and provided trainings to prepare staff to implement these strategies. Staff continue to work with businesses in Greater Nebraska communities to identify needs for these strategies and other services.

ii. to support a local workforce development system that meets the needs of businesses in the local area;

Greater Nebraska participates in the Career Pathways Workgroup established by the Nebraska Workforce Development Board. The Workgroup identified 4 tasks for strategy implementation.

- Task 1. Selecting and prioritizing development of career pathways for three or more in-demand industry sectors.
- Task 2. Identifying three or more barriers to participation in career pathways among job seekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment
- Task 3. Identifying five or more critical barriers to participation in career pathways among employers and priority industry sectors
- Task 4. Identifying and determining methods for addressing the top five identified critical barriers to participation in career pathways experienced by job seekers and workers, including unemployed workers; Veterans; individuals with barriers to employment; and employers and priority industry sectors

Task 1. Selecting and prioritizing development of career pathways for three or more in-demand industry sectors

Refer to Sec. 1.a.ii. above for information on Greater Nebraska’s activities concerning selecting and prioritizing development of career pathways.

Task 2. Identifying three or more barriers to participation in career pathways among job seekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment

The Workgroup identified barriers experienced by jobseekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment. Below is the Workgroup’s current list of critical barriers, with an operationalization statement for each.

1. Childcare. The financial burden for maintaining adequate childcare impedes continuous employment and may also include an inability to find adequate childcare or disruptions in service that adversely impact single parents at a high rate.

2. Criminal history. Exclusionary employment policies and practices create structural barriers for ex-offenders and prevent them from entering or reentering the workforce.
3. Low income. Limited income precludes job seekers/workers from obtaining necessary occupational skills training and credentials and accessing transportation resources necessary for employment in in-demand industry sectors in local and regional labor markets.
4. Disability/health. Unfavorable institutional barriers arise from misperceptions of increased business costs, lack of worker qualifications, or performance issues due to job seeker/worker disabilities or health issues.
5. Cultural differences. Cultural differences compete with norms, values, and beliefs, which may extend to language barriers for individuals lacking English language proficiency.
6. Literacy skills, basic credentials, occupational credentials. Barriers are created when individuals lack adequate literacy skills, basic credentials (GED or high school diploma), and occupational credentials required to perform minimum job requirements or essential employment functions.
7. Aging-out of foster care. Youth who have aged out of foster care and lack adequate housing, transportation, education, or training necessary to enter the workforce experience significant barriers.

Task 3. Identifying five or more critical barriers to participation in career pathways among employers and priority industry sectors

The Workgroup is in the process of identifying barriers experienced by employers. The Workgroup is currently working on the first step of an employer engagement plan which is to conduct outreach and recruitment of business and industry sector representatives from the priority industry sectors identified under Task 1.

Greater Nebraska one-stop delivery system partners will engage with businesses to identify current and upcoming skills/training needs to support local area stability and growth. Community based postsecondary education and training providers will be involved to develop relevant training programs and resources. Program alignment around business needs will incorporate work-based learning and customized trainings to develop a talent pipeline solution for employer hiring needs.

The workforce system in the region will work collectively with the Nebraska Manufacturing Advisory Council (NeMAC), other trade councils, and local employers to identify and address workforce needs. Greater Nebraska staff are involved in EmployNebraska groups throughout the local office regions. These groups are focused on the collective needs of businesses and job seekers to more efficiently connect employers with talent. The one-stop operator will engage with local chambers of commerce and economic groups to identify additional opportunities to participate in community initiatives.

Employer summits held as part of the APHSA technical grant will provide data to guide efforts toward service delivery and process improvements. Initial efforts will focus on barriers identified during the healthcare summit held in December 2022. During the initial summit, the following were identified as barriers to recruitment:

1. Formed partnerships without any real momentum. Talent pipelines coming out of the colleges tend to disperse without the opportunities for companies to connect with them. Career and Technical college job fairs are not being promoted as they have in the past.
2. Connecting with job seekers who have been in the workforce for 5-15 years. Particularly, job seekers who have families and struggle to work and obtain credentials necessary for opportunities.
3. Inflexible work schedules. Due to current staffing levels, many employers have had to implement lengthy shifts or mandatory overtime, which is not appealing to some candidates, particularly those with families.
4. Streamlining the selection process. Background and reference checks often take several weeks to come back. These checks are required for positions in healthcare and out of the control of employers. In some cases, new hires are going through the entire selection process for employers to find out they are not interested in working for the company.

The following were identified as barriers to retention:

- Job hopping. With the shortage of workers, employees are moving from job to job for gains in wages or hiring bonuses.
- Hesitance to provide assistance for advancement, such as tuition assistance. Some employers reported issues with employees moving on to another company offering more competitive wages and benefits after utilizing advancement assistance.
- Lack of advancement opportunities. Smaller businesses reported issues with retaining employees due to limited growth potential.

Task 4. Identifying and determining methods for addressing the top five identified critical barriers to participation in career pathways experienced by job seekers and workers, including unemployed workers; Veterans; individuals with barriers to employment; and employers and priority industry sectors

Greater Nebraska will participate in the Workgroup’s efforts to determine methods for addressing the top five identified critical barriers to participation in career pathways experienced by job seekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment, as well as employers and priority in-demand industry sectors, including:

- career services, youth program services, and supportive services that resolve the identified critical barriers experienced by job seekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment;
- work-based training opportunities that resolve the identified critical barriers experienced by employers and priority in-demand industry sectors, such as Registered Apprenticeship programs, pre-apprenticeship programs, on-the-job training, internships, customized training, and incumbent worker training; and
- coordination of services by and among the entities identified in Task 3 to minimize the effects of the top five identified critical barriers to participation in career pathways experienced by job seekers and workers, including unemployed workers, Veterans, and individuals with barriers to employment, as well as employers and priority in-demand industry sectors.

iii. to better coordinate workforce development programs and economic development;

The one-stop operator will incorporate the following strategies as part of an initiative to better coordinate workforce programs with economic development programs:

1. Staff and board member attendance at Chamber of Commerce and economic development functions
2. Staff and board member attendance at the annual Governor’s Summit on Economic Development
3. Board updates on each local office area economic development activities, sector partnerships, economic planning
4. Active participation in State and local economic development planning
5. Relationship building between workforce professionals and economic development professionals
6. Expansion of access to entrepreneurial and small business development offerings through technology, promotion, and referral of workforce customers to these local resources

The Greater Nebraska one-stop operator continues to work on these initiatives and strengthen collaboration. The OSO has seen great success in areas such as the Panhandle, where Greater Nebraska, Economic Development, and other partners have come together to work on a strategic plan to increase entrepreneurship in the area and address infrastructure and housing needs in preparation for new employers committed to bringing their operations to the area over the coming years.

iv. to strengthen linkages between the one-stop delivery system and unemployment insurance programs; and

Workforce center staff have been cross trained to provide meaningful assistance to unemployment insurance claimants. Staff are trained to assist claimants with navigating the unemployment application and answering

questions pertaining to most communication received. Resource rooms are equipped with dedicated UI computers and ringdown phones to connect claimants directly with UI staff during hours of operation. Additionally, UI staff are co-located at most centers, providing claimants and workforce services staff a direct resource for more technical questions. Most workforce services staff assisted with UI benefits functions during the height of claims resulting from COVID. This direct exposure has better equipped staff with an understanding of how to help claimants proactively provide needed documents for increased efficiency of claim processing.

Colocation of UI staff has created a stronger partnership between UI and other one-stop partner programs. UI will continue to be incorporated in programs such as NERes and Rapid Response. Moving forward, the one-stop operator will work with UI to educate staff about the program and help facilitate better customer service.

All UI claimants are required to participate in Nebraska's Reemployment Services and Eligibility Assessment program, known as NERes, includes one-on-one job coaching and other assistance for getting back to work. During these sessions, claimants and other voluntary participants are provided with information about one-stop partner program services, including WIOA Title I services.

An area of opportunity with UI customers includes ensuring that they are aware of all the avenues available to them through the AJCs and one-stop centers, not just UI services. A reemployment services presentation has been developed and printed material updated for staff use. The one-stop operator has also implemented a handbook outlining all programs and services, which has been made available to staff and customers.

Additionally, Greater Nebraska added questions pertaining specifically to UI to the local area customer satisfaction survey. This survey is provided to all individuals who receive a service by email, NEworks messaging, and QR codes posted and available on cards in the offices. The survey will be conducted on a regular basis (minimum monthly) and sent to office managers.

- v. that may include the implementation of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies designed to meet the needs of regional employers. these initiatives must support the strategies described above in paragraphs i. through iv.;**

Greater Nebraska will utilize data including timely labor market information, employment projections, and information gathered directly from employers to help devise strategies that ensure Nebraska businesses have the talent needed to thrive in a global economy. Initiatives may include but are not limited to Title II, Integrated Education and Training (IET) and Workplace Literacy new and customized training options, IWT, on the job training, industry specific assessments, work-based learning opportunities, collaboration with state and local economic development agencies to implement industry sector strategies, and other initiatives that respond to the needs presented in the data and expressed directly by employers.

The local area will use labor market data and NEworks (Nebraska's management information system of record) to provide information to students, unemployed and underemployed individuals, and new workers on high-wage, high-skill and high-demand (H3) jobs in Nebraska. This information will help to guide individuals to career pathways that meet their needs and interests.

The GNWDB has identified the expansion of work-based learning models as a key strategy for improving access to employment that concurrently prepares individuals with the skills needed for employment and addresses business needs. GNWDB will work with businesses, business intermediaries such as the chambers of commerce, and organized labor to develop new work-based learning models in regional target industries.

- d. description of how the local board will coordinate local workforce investment activities with regional economic development activities that are carried out in the local area and how the local board will promote entrepreneurial skills training and microenterprise services;**

This is an area of opportunity for Greater Nebraska. Under guidance from the GNWDB, the one-stop operator will increase efforts toward the development and implementation of programs and strategies that are focused on microenterprise and entrepreneurial training. This will include:

- increased participation in economic development activities focused on entrepreneurship;
- enhanced training for Greater Nebraska staff;
- and cross training with providers of entrepreneurial skills training and microenterprise services.

- e. description of the local one-stop delivery system, including;**

- i. how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local employers, workers, and job seekers;**

GNWDB is committed to continuous improvement, as are Greater Nebraska one-stop delivery system partners. GNWDB monitors the effectiveness of its local one-stop delivery system through regular committee meetings and reports on program performance, enrollments, compliance, and customer satisfaction. GNWDB has established the following activities to track and assure continuous improvement.

1. The System Coordination Committee focuses on:
 - a. aligning and leveraging services and resources of one-stop delivery system partner programs;
 - b. monitoring one-stop delivery system performance; and
 - c. forming strategies to ensure continuous improvement of the system.
2. The Strategic Planning Committee focuses on:
 - a. guiding employer engagement, sector strategies, and development of career pathways; and
 - b. monitoring of program finances and the one-stop system.
3. One-stop operator activities focus on:
 - a. joint planning, policy development, and system design processes to ensure delivery of integrated services, program alignment, a multi-entry or “no wrong door” approach to accessing local area program services, and elimination of duplication of services;
 - b. regularly evaluating the availability of career services and referrals to system partners;
 - c. ensuring accessibility and effectiveness of service provision to populations with barriers to employment as defined in WIOA Sec. 3(24);
 - d. ensuring accessibility and effectiveness of service provision to employers;
 - e. developing and implementing effective communication tools to increase information sharing and collaboration with GN’s one-stop delivery system partners;
 - f. collecting and evaluating input from customers, including employers, one-stop delivery system partners, and community partners to develop specific improvement strategies;
 - g. participating in regularly scheduled one-stop delivery system partner meetings, local area task forces, and other collaborative opportunities to exchange information and encourage program and staff integration.

In addition, GNWDB will ensure that Greater Nebraska one-stop partner programs are meeting the needs of local area employers, job seekers, and workers through the following activities:

1. review of labor market trends to anticipate employer needs;
2. evaluating workforce system performance measures;
3. review of all employer satisfaction surveys;
4. review of data compiled from the industry sector survey;
5. use of data to drive strategic planning and operational efficiency.
6. increasing participant co-enrollments in partner programs;
7. reviewing all customer satisfaction surveys received from job seekers, workers, and employer;

8. developing and implementing participant co-enrollments, assessments, referrals, and case management processes; and
9. expanding work-based learning opportunity to improve access to employment that concurrently prepares individuals with the skills needed for employment.

Further, Greater Nebraska's WIOA Title I and Title III service providers are expected to meet quarterly QA and annual DVM requirements to ensure that all information entered into NEworks is accurate and appropriately documented in program participant files. When the results of QA and DVM indicate that the needs of local job seekers, workers, and employers are not being met as required, GNWDB will establish a corrective action plan.

GNWDB has developed a more robust local area monitoring process and formal report structure concerning identification of findings and areas of concerns, as well as technical assistance and training provided to address monitoring report results. The current process consists of:

1. annual data validation monitoring (DVM) conducted on a list of case files randomly selected according to state policy;
2. quarterly QA reviews conducted on a list of case files randomly selected according to state policy;
3. mandatory training for all case managers and one-stop center managers for any QA/DVM activities that received a quality score of less than 80 percent;
4. review and approval of all expenditures prior to submission to NDOL Finance for reimbursement, followed by review and recording of all expenditures paid out by NDOL Finance;
5. technical assistance and additional training provided to case managers and one-stop center managers to address issues identified during local area monitoring, in addition to state level monitoring;
6. compliance reviews concerning nondiscrimination, disability, and equal opportunity requirements evaluated as part of the AJC certification processes; and
7. reporting findings identified and training conducted to the Chief Elected Officials Board and GNWDB during joint local area public meetings.

ii. how the local board will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and other means;

GNWDB will continue to work with Greater Nebraska administrative entity staff to develop mobile processes and expand access to the one-stop delivery system. Greater Nebraska staff have been equipped with needed equipment and support to increase outreach and service delivery efforts to remote areas. Greater Nebraska is working on development and execution of a plan to allow workforce system partners and libraries to connect with Greater Nebraska one-stop centers via video conferencing platforms to provide job seekers access to workforce staff for quick assistance and scheduled program appointments. Reemployment services orientation videos will continue to be developed and made available online through NEworks and NDOL social media platforms. Additional initiatives include identification of virtual hiring event best practices and expansion of this tool to better serve employers and job seekers.

GNWDB will ensure accessibility of basic and individualized career services, training services, and follow up services through the one-stop delivery system..

Access to Greater Nebraska's one-stop delivery partner programs is available through the local area's one-stop delivery system through collocated partner programs or direct linkage through real-time technology whenever the partner services are not made available on site.

One-stop operator responsibilities facilitate programmatic accessibility through organization and coordination with one-stop delivery system partner programs to optimize and streamline service delivery efforts. In addition, Greater Nebraska's operational policies reflect and ensure an integrated system of program performance, communication, and case management services, including use of technology to achieve integration and expanded service offerings, which will be monitored and enhanced based on customer satisfaction survey results. Also, standard operating procedures (SOPs) have been developed with Trade and SNAP Next Step E&T. Additional SOPs are in development with TANF and Job Corps.

iii. how entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA Sec. 188 and applicable provisions of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities;

All Greater Nebraska AJCs and one-stop centers are physically accessible, in compliance with ADA standards for physical accessibility design. Further, all Greater Nebraska AJCs and one-stop centers are programmatically accessible. Reasonable accommodations and modifications are provided in AJCs and one-stop centers for individuals with disabilities when administering assessments, in compliance with WIOA Sec. 188 and applicable provisions of the Americans with Disabilities Act of 1990 (42 USC 12101 et seq.). Each center is equipped with assistive technology for individuals with visual and/or mobility impairments. NCBVI recently updated the equipment at each site to include the LyriQ reader and ONYX OCR. This is in addition to JAWS and Dragon Naturally Speaking, both of which are maintained by Nebraska Department of Labor.

The Nebraska VR Program (vocational rehabilitation - general) is co-located at both Greater Nebraska AJCs and direct linkage has been established with NCBVI. Partnerships Nebraska VR and NCBVI enable the Greater Nebraska one-stop delivery system to utilize their expertise to help identify issues and develop strategies for correcting any physical or programmatic accessibility issues.

All Greater Nebraska AJCs and one-stop centers will work proactively with workforce system partners who have specialized expertise regarding the design of services for individuals with disabilities to improve adaptive service offerings. NCBVI provided training to all Nebraska Department of Labor staff in 2022 concerning service delivery to individuals requiring visual accommodations. Additional trainings are in development and will be implemented ongoing. Referral processes and resource lists will be implemented to quickly connect individuals with accommodations.

All AJC and one-stop center customers are provided with the mandatory notice of Equal Employment Opportunity rights and grievance procedures, to ensure Greater Nebraska is in compliance with WIOA Sec. 188, 29 CFR Part 38, and 20 CFR 683.285.

Greater Nebraska utilizes Language Line for English language learners who are not fluent in English. Training on Language Line services was provided to all Greater Nebraska staff in 2022. UI received an Equity Grant through NASWA in 2022. As part of this grant, the process of applying for unemployment insurance was evaluated as areas of process improvement to ensure access to services is equitable across all populations, including those with higher barriers. Additionally, all Greater Nebraska documents were evaluated for readability and were translated to both Spanish and Vietnamese.

iv. roles and resource contributions of the one-stop partners;

In accordance with WIOA Sec. 121(c) and 20 CFR 678.420, each required one-stop partner contributes toward AJC infrastructure and additional costs associated with AJC operations, including provision of basic and individualized career services, training services, and follow up services. Each additional one-stop partner contributes toward AJC infrastructure and additional costs associated with AJC operations in accordance with their respective MOUs.

Required one-stop partners and additional one-stop partners continue to work toward full integration of all services available throughout the Greater Nebraska one-stop delivery system, as described below.

Table 1. Required one-stop partner roles and resource contributions

Partner program	Partner entity	Services/resources
1. WIOA Title I Adult, dislocated worker, and youth programs	<ul style="list-style-type: none"> • Nebraska Department of Labor 	Resources for training and employment
2. WIOA Title II Adult Education and Family Literacy Act programs	<ul style="list-style-type: none"> • Nebraska Department of Education • Central Community College • Northeast Community College • Southeast Community College • Mid-Plains Community College • Western Nebraska Community College • Crete Public Schools 	Basic Skills Improvement, High School Equivalency Preparation, English as a Second Language, Rights and Responsibilities of Citizenship and Civic Participation, Workforce Preparation Activities, Integrated Education and Training
3. WIO Title III Wagner-Peyser Employment Services	<ul style="list-style-type: none"> • Nebraska Department of Labor 	Business and Job Seeker services
4. Title IV vocational rehabilitation programs	<ul style="list-style-type: none"> • Nebraska VR; • NCBVI 	Job training, employment accommodations, skills coaching; Accessibility training for staff
5. Career and Technical Education (Perkins) programs	<ul style="list-style-type: none"> • Nebraska Department of Education; • Central Community College • Northeast Community College • Southeast Community College • Mid-Plains Community College 	Vocational curriculum, career counseling, academic-vocational integration, and experiential learning
6. Community Services Block Grant (CSBG) programs	<ul style="list-style-type: none"> • Blue Valley Community Action Partnership • Central Community Action Partnership • Community Action Partnership of Mid-NE • Northeast Community Action Partnership • Southeast Community Action Partnership 	Basic needs services, emergency assistance, supportive services, early childhood education
7. Jobs for Veterans State Grant program	<ul style="list-style-type: none"> • Nebraska Department of Labor 	Veterans' services: Local Veterans' Employment Representative; Disabled Veterans' Outreach Program
8. Housing and Urban Development (HUD) programs	<ul style="list-style-type: none"> • Fairbury Housing Authority • Scotts Bluff County Housing Authority 	Housing services
9. Job Corps	<ul style="list-style-type: none"> • Pine Ridge Job Corps 	Residential education and job training
10. Migrant and Seasonal Farmworker program	<ul style="list-style-type: none"> • Proteus 	Job training, health care, education assistance
11. Native American programs	<ul style="list-style-type: none"> • Ponca Tribe • Winnebago Tribe 	Health services, social services, education
12. Second Chance Act program	<ul style="list-style-type: none"> • Siouxland Human Investment Partnership 	Reentry Employment Opportunities
13. Senior Community Services Employment Program	<ul style="list-style-type: none"> • National Able Network 	Resources for training and employment
14. SNAP Next Step E&T program	<ul style="list-style-type: none"> • Nebraska Department of Health and Human Services 	Resources for training and employment

Partner program	Partner entity	Services/resources
15. TANF program	• Nebraska Department of Health and Human Services	Resources for training and employment
16. Trade Adjustment Assistance program	• Nebraska Department of Labor	Resources for training and employment
17. Unemployment Insurance program	• Nebraska Department of Labor	Unemployment benefits

Table 2. Additional one-stop partner roles and resource contributions

Partner program	Partner entity	Services/resources
1. Supplemental Nutrition Assistance Program (SNAP)	• Nebraska Department of Health and Human Services	Resources for training and employment
2. Temporary Assistance for Needy Families (TANF)	• Nebraska Department of Health and Human Services	Resources for training and employment

f. description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area;

Greater Nebraska provides high quality employment and training services to assist job seekers with acquiring essential skills to compete for in-demand jobs. Services are coordinated by partner providers to ensure goals are in alignment and services are not duplicated. Nebraska's Eligible Training Provider List (ETPL) provides a comprehensive and robust offering of long-term and short-term occupational skills training (OST) for most occupations. Work based learning, which includes on the job training, registered apprenticeships, transitional jobs, customized training, work experience, job shadowing, and pre-apprenticeship, is also available to participants.

Title I adult and dislocated worker programs actively conduct outreach to individuals with barriers to employment. All facilities are physically accessible, in compliance with ADA standards for accessible design. Reasonable accommodations and modifications are provided to individuals with disabilities when administering assessments. All information is provided in an accessible, understandable, and usable format.

There are three types of "career services" available for adults and dislocated workers through AJCs and one-stop centers: basic career services, individualized career services, and follow-up services. These services may be provided in any order as sequence of service is not required, which provides staff the flexibility to target services to meet the needs of the customer.

Table 3. Basic career services available for adult and dislocated worker program participants

Basic Career Services
1. Eligibility determination for workforce partner services, including WIOA Title IB adult, dislocated worker, and youth programs.
2. Outreach, intake (including profiling), and orientation to information and other services available through the local workforce delivery system. <ol style="list-style-type: none"> For the TANF program, local areas must provide individuals with the opportunity to initiate an application for TANF assistance and non-assistance benefits and services, which could be implemented through the provision of paper application forms or links to the application web site
3. Initial assessment of skill levels including literacy, numeracy, and English-language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive services needs
4. Labor exchange services, including: <ol style="list-style-type: none"> job search and placement assistance and career counseling (when needed by an individual), including provision of information on in-demand industry sectors and occupations and nontraditional employment; appropriate recruitment and other business services on behalf of employers, including labor market information and referrals to specialized business services other than those traditionally offered through the local one-stop delivery system

Basic Career Services
5. Provision of referrals to and coordination of activities with other programs and services, including programs and services within the local one-stop delivery system and, when appropriate, other workforce development programs
6. Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including: <ul style="list-style-type: none"> a. job vacancy listings in labor market areas; b. information on job skills necessary to obtain the vacant jobs listed; and c. information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those occupations
7. Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provided by program and type of providers
8. Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the local one-stop delivery system
9. Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including: <ul style="list-style-type: none"> a. childcare; b. child support; c. medical or child health assistance available through Nebraska's Medicaid program and Children's Health Insurance Program; d. benefits under SNAP; e. assistance through the earned income tax credit; f. assistance under Nebraska's TANF program and other supportive services and transportation provided through TANF
10. Provision of information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation. <ul style="list-style-type: none"> a. Meaningful assistance means: <ul style="list-style-type: none"> i. Providing assisting on-site using staff who are well-trained in unemployment compensation claims filing and the rights and responsibilities of claimants; or ii. Providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time.
11. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA

Table 4. Individualized career services available to adult and dislocated worker program participants

Individualized Career Services
1. Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include: <ul style="list-style-type: none"> a. diagnostic testing and use of other assessment tools; and b. in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals
2. Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including information on and access to the ETPL, as described in 20 CFR 680.180
3. Group counseling
4. Individual counseling
5. Career planning
6. Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training
7. Internships and work experiences that are linked to careers, as described in 20 CFR 680.170
8. Workforce preparation activities
9. Financial literacy services, as described in WIOA Sec. 129(b)(2)(D) and 20 CFR 681.500

Individualized Career Services
10. Out-of-area job search assistance and relocation assistance
11. English language acquisition and integrated education and training programs

Follow-up services

Greater Nebraska provides follow-up services for adults and dislocated workers for up to 12 months after the first date of unsubsidized employment. Follow-up services vary by type and intensity as they are based on the individual needs of each Title I adult and dislocated worker program participant, in accordance with WIOA Secs. 3(59) and 134(d)(2)-(3) and 20 CFR 680.900.

Training activities

In addition to basic and individualized career services, Greater Nebraska provides access to training services for adult and dislocated worker program participants as described in 20 CFR 680.200.

g. description of how the local board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities;

GNWDB will ensure that Greater Nebraska coordinates workforce investment activities carried out in the local area with statewide rapid response activities, in accordance with NDOL's Rapid Response Manual.

h. description and assessment of the type and availability of youth workforce investment activities in the local area including activities for youth who are individuals with disabilities, which must include an identification of successful models of such activities;

Greater Nebraska strives to serve all youth through an integrated service delivery system. Partnerships with organizations including Nebraska VR Program and NCBVI are integral to ensuring staff are equipped to think inclusively and provide accommodations, if needed. High quality services for in-school and out-of-school youth begins with career exploration and guidance, continued support for educational attainment, and opportunities for skills training. Participants are provided opportunities for work-based learning through work experience, summer employment opportunities, on the job training, internships, job shadowing, pre-apprenticeship programs, and Registered Apprenticeship programs.

Many youth have multiple challenges to employment and may need a variety of support and services. GNWDB ensures that each AJC is universally accessible and that physical, programmatic, and communications access is available to everyone, including persons with disabilities. Universal design is incorporated into the GNWDB certification process of each AJC and affiliate site.

Greater Nebraska provides all youth with the 14 youth program elements, in accordance with WIOA Sec. 129(c)(2), 20 CFR 681.460, and Nebraska's Combined State Plan for PY24 – PY27.

Table 5. Youth program services

Youth program services
1. Tutoring, study skills training, instruction, and dropout prevention activities
2. Alternative secondary school and dropout recovery services
3. Paid and unpaid work experience
4. Occupational skills training
5. Education offered concurrently with workforce preparation
6. Leadership development opportunities
7. Supportive services
8. Adult mentoring
9. Comprehensive guidance and counseling
10. Financial literacy education

Youth program services
11. Entrepreneurial skills training
12. Services that provide labor market information
13. Postsecondary preparation and transition activities
14. Follow-up services

i. how the local board will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services;

Greater Nebraska Title I and Wagner-Peyser programs coordinate with Nebraska Department of Education under the Carl D. Perkins Career and Technical Education act. Workforce staff work closely with local area education providers to integrate services and connect students and job seekers with career pathways determined by participant interest and labor market information. Each office is connected with local area secondary schools to coordinate presentations, tours, career fairs, and other activities geared toward youth exploring career opportunities as part of the reVISION program. Work Experience funds are used to help youth gain the knowledge, skills, and abilities needed for the workforce, in addition to providing an opportunity to explore career paths they may be interested in pursuing. Secondary schools in Nebraska have been expanding career and technical programs to expose students to Nebraska industries and prepare them to meet the needs of local area businesses. The local area will work to support initiatives such as the Grand Island Public School's Career Pathways Institute. Through this project, students at Grand Island Public Schools are connected with the Grand Island AJC for support during their apprenticeship with a local area employer.

Local area postsecondary providers are receptive to business/industry needs, ensuring coursework offerings are relevant to industry needs. The local area will work with its community colleges to share data that informs the development of new courses, curricular modifications, and recruitment efforts. The GNWDB will make every effort to support community college proposals for grants and attempts to integrate services into the proposals will be made. Recently, Central Community College, Northeast Community College, and Southeast Community College received a grant to develop Registered Apprenticeship hubs through the Apprenticeship Building America (ABA) Program. Greater Nebraska is supporting this initiative by helping to connect job seekers with available programs, evaluating individuals for program eligibility, and enrolling as an appropriate to provide support with training, education, case management, and supportive services.

j. how the local board will coordinate Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area;

Greater Nebraska partners with TANF, Community Action Partnerships, SNAP Next Step E&T, SCSEP, Job Corps, and other partners to coordinate assistance for clients. Each office is also building a relationship with Bring Up Nebraska coalitions throughout the state to increase access to supportive services. Provision of supportive services is prioritized based on availability through partner programs and the immediacy of the need.

Fourteen Greater Nebraska communities have public transit within city limits, in addition to intercity routes connecting 30 Nebraska communities and four communities in neighboring states. Despite this transit system, the vast geographic area of the local area and the lack of public transit in rural areas complicates the ability to meet the needs of employers and job seekers. Where possible, Greater Nebraska provides bus passes and mileage reimbursement to eligible participants to attempt to mitigate this primary barrier. WIOA Title 1B staff coordinate services with partners in their respective communities.

The lack of a comprehensive and reliable transit system in all Nebraska communities is widely recognized. Efforts exist in Nebraska to address these shortfalls. Nebraska Department of Transportation developed a multi-phase Mobility Management project to identify and address gaps in service delivery. The Mobility Management Phase 1 project produced a comprehensive concept development report which identified regional centers across the state that were transportation destinations for medical services, shopping, and employment. During this phase market needs were analyzed, and concepts were developed to fill gaps in service.

In Phase 2, the state was organized into six regions based on the regional centers identified in Phase 1 (Panhandle, Southwest, North Central, South Central, Northeast, and Southeast). Statewide and Regional Coordinating Committees were established to identify additional gaps and needs. Focusing on each region, coordination strategies were developed based on leveraging existing service to improve access, creating system efficiencies to reduce redundant service and expanding transportation access to areas without service.

The Nebraska Department of Transportation launched Phase 3 of the Mobility Management Project in July 2019. Stage One, consisting of seven projects, including several studies, coordination, public relations, and selection of a technology vendor, is currently underway. As part of this project, Open Plains Transit recently added rural public transit in Valentine, Nebraska, a largely underserved area. Partners in Columbus, another underserved area, are currently working on the development of a transit system in the Columbus area.

k. plans, assurances, and strategies for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act (29 USC 49 et seq.) services and other services provided through the one-stop delivery system;

Greater Nebraska will work to align services across programs in partnership with the state board's Alignment Workgroup and ensure ongoing cross training is completed with all partners to eliminate duplication of services.

The North Platte office has developed a model for collaborative service integration across all programs. This has resulted in a stronger understanding of partner programs and resources, increasing referrals, co-enrollments, and coordination of services. Memorandums of Understanding (MOUs) have been established to define a detailed process among AJC partners. MOUs will be reviewed in 2026 and updated as appropriate.

The Title III Wagner-Peyser Program Coordinator has developed comprehensive training to prepare all new staff for light case management activities. As these processes have been implemented throughout the state, best practices that are identified are shared with other offices.

l. Describe how the local board will coordinate Title I workforce investment activities with adult education and literacy activities authorized under Title II, which must include a description of how the local board will carry out the review of local applications submitted under Title II consistent with WIOA Secs. 107(d)(11)(A) and (B)(i) and WIOA Sec. 232;

The GNWDB will work to strengthen and improve shared service delivery with Title II Adult Basic Education (ABE) and English Language Learning (ELL) programs to improve literacy skills that include reading, writing, math, and/or English language skills. Strategies for supporting the above goal include:

- Work collaboratively to develop strategies to help participants achieve their goals and minimize barriers. WIOA is able to provide additional case management and supportive services including, but not limited to tutoring, transportation, etc.
- Work jointly with participants to set appropriate employment goals, which must include ABE/ELL with referrals made to the Title II adult education provider, goals and may include additional training/education.
- Host regular trainings/workshops with local area ABE/ELL providers to increase awareness of programs. Regular may be annual, quarterly, or otherwise determined by the ABE/ELL provider, with a goal of presenting to each participant cohort. Trainings and workshops are at the discretion of the ABE/ELL provider.
- Utilize the same vocabulary and terminology with customers.
- Encourage students to utilize the AJC to conduct job search and other workshops in collaboration with Title II Adult Education classes.
- Improve the direct referral process for individuals in need of basic skills improvement, high school equivalency credentialing, and English language learning, utilizing the adult education online student portal as well as workforce preparation activities and job placement services.

During competitive funding application years, the workforce board carries out a review of specific portions of local applications submitted under WIOA Title II by eligible service providers seeking a grant under the provisions of The Title II Adult Education and Family Literacy Act to determine whether the content of specific portions of such applications are in alignment with the local plan.

The Title II Adult Education State Director will instruct the GNWDB on the process and procedures for the review. The State Director will also provide the appropriate application sections of all eligible applicants serving in the identified workforce area along with the necessary determination forms to assist the GNWDB in reporting their findings.

The workforce board chair will designate a review team of no less than three board members to participate with the workforce administrator in the review of the submitted applications.

The review team will document the appropriate alignment form, and whether the application is found to be consistent with the local plan. These evaluations will be provided to the GNWDB chair for recommendations to the State Director. On behalf of the workforce board, the GNWDB chair will notify the Title II Adult Education State Director in writing of the recommendations no later than 15 working days after receipt of the application.

- m. copies of executed cooperative agreements which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local one-stop delivery system, including cooperative agreements (as defined in WIOA Sec. 107(d)(11)) between the local board or other local entities described in WIOA Sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 USC 721(a)(11)(B)) and the local office of a designated state agency or designated state unit administering programs carried out under Title I of the Rehabilitation Act (29 USC 720 et seq.) (other than Sec. 112 or Part C of that Title (29 USC 732, 741) and subject to Sec. 121(f) in accordance with Sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination;**

Greater Nebraska has not established cooperative agreements.

- n. identification of the entity responsible for the disbursement of grant funds described in WIOA Sec. 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under WIOA Sec. 107(d)(12)(B)(i);**

NDOL is the entity responsible for disbursement of grant funds described in WIOA Sec. 107(d)(12)(B)(i)(III).

- o. description of the competitive process that will be used to award the subgrants and contracts for Title I activities;**

Greater Nebraska utilizes and adheres to competitive procurement policies and procedures established by the Nebraska Department of Administrative Services.

- p. description of local levels of performance negotiated with the Governor and chief elected official consistent with WIOA Sec. 116(c), to be used to measure the performance of the local area and to be used by the local board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under Title IB, and the one-stop delivery system in the local area;**

Greater Nebraska biennial local area performance levels are negotiated between GNWDB and NDOL. Negotiated levels of performance for PY24 and PY25 are described below in Tables 6, 7, and 8.

Table 6. Negotiated levels of performance for Greater Nebraska’s Title I adult program, PY24 and PY25

Adult	PY 2024	PY 2025
Employment Q2 after exit	82%	82%
Employment Q4 after exit	79%	79%
Median earnings Q2 after exit	\$8,400.00	\$8,400.00
Credential Attainment Rate	70%	70%
Measurable Skills Gains	70%	70%

Table 7. Negotiated levels of performance for Greater Nebraska’s Title I dislocated worker program, PY24 and PY25

Dislocated Worker	PY 2024	PY 2025
Employment Q2 after exit	87%	87%
Employment Q4 after exit	88%	88%
Median earnings Q2 after exit	\$9,100.00	\$9,100.00
Credential Attainment Rate	72.5%	72.5%
Measurable Skills Gains	72%	72%

Table 8. Negotiated levels of performance for Greater Nebraska’s Title I youth program, PY24 and PY25

Youth	PY 2024	PY 2025
Employment Q2 after exit	84%	84%
Employment Q4 after exit	82%	82%
Median earnings Q2 after exit	\$5,000.00	\$5,000.00
Credential Attainment Rate	65%	65%
Measurable Skills Gains	55%	55%

q. description of actions the local board will take toward becoming or remaining a high-performing local board, consistent with the factors developed by the state workforce development board;

The Nebraska Workforce Development Board has not established guidelines for high-performing local boards.

r. description of how training services outlined in WIOA Sec. 134 will be provided through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter, and how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided;

Individual Training Accounts (ITAs)

Training services for Title IB program participants are typically provided by Eligible Training Providers (ETPs) listed on Nebraska’s ETPL through ITAs. ITAs are payment agreements with ETPs established on behalf of Title IB program participants by Title IB programs to purchase training services from ETPL programs selected by participants in consultation with career planners (aka case managers) and discussion of program quality and performance information for programs listed on the ETPL.

Training services, when determined appropriate, must be provided either through an ITA, as described above, or through a training contract. Except under limited conditions described in WIOA Sec. 122(h) and 20 CFR 680.320, training services must be provided by ETPs in accordance with WIOA Sec. 122(d). Refer to the next section for information on contract exceptions to use of ITAs.

GNWDB will not establish ITA limitations, such as restricting the availability of ITAs for specific occupations, which undermine requirements that training services be provided in a manner that maximizes consumer choice in the selection of a training provider, in accordance with WIOA consumer choice requirements.

Contract exceptions to use of ITAs

As mentioned above, ITAs are the primary method to be used for procuring training services for Title IB program participants. However, training contracts may be used to provide training services instead of ITAs under limited conditions (referred to as training exceptions or contract exceptions). Pursuant to WIOA Sec. 134(c)(3)(G)(ii) and consistent with 20 CFR 680.320, 680.340, and 680.530, GNWDB may use contracts for training services instead of ITAs under one or more of the following conditions:

1. on-the-job training services, which may include paying for the on-the-job training portion of Registered Apprenticeship programs, customized training, incumbent worker training, and transitional jobs;
2. when local boards determine through processes and procedures established under local plans and plan modifications and local policies, processes, and procedures that there are an insufficient number of ETPs in local areas to accomplish the purpose of a system of ITAs, provided such processes and procedures require a public comment period of at least 30 days for interested providers of training services;
3. in order to use training services from programs that have demonstrated effectiveness in serving individuals with barriers to employment that are offered by community-based organizations or other private organizations, based on GNWDB's criteria for determining demonstrated effectiveness particularly as it applies to individuals with barriers to employment to be served, which include:
 - a. evaluation of the financial stability of the organizations;
 - b. evaluation of documentation on the organizations' demonstrated performance in the delivery of services to individuals with barriers to employment through such means as:
 - i. program completion rates;
 - ii. attainment rates for skills, certificates, or degrees the programs are designed to provide; and
 - iii. placement rates after training in unsubsidized employment and retention in such employment;
 - c. how the training programs relate to workforce investment needs identified in local plans and plan modifications;
4. when local boards determine that the most appropriate training could be provided by an institution of higher education or other provider of training services in order to facilitate the training of a cohort of multiple individuals for jobs in in-demand sectors or occupations; or
5. when GNWDB determines pay-for-performance contracts are suitable, consistent with 20 CFR 683.500:
 - a. Note. No more than 10 percent of the local funds may be spent on pay-for-performance contract strategies as defined in WIOA Sec. 3(47) and consistent with 20 CFR 683.510.

GNWDB processes for evaluating use of contracted training providers/programs in lieu of ITAs with ETPL providers

The GNWDB Strategic Planning Committee is responsible for reviewing proposed training service contracts. The Committee will utilize the criteria listed above to determine whether contracts with proposed training providers should be recommended to GNWDB for approval. If the above criteria is met, the Committee may make a recommendation to GNWDB to approve training service contracts.

Consumer choice

GNWDB ensures that training services are provided to Title I program participants in a manner that maximizes informed consumer choice and meets consultation requirements, as described below.

1. Program participants may select programs of training services from Nebraska's ETPL after consultation with case managers.
2. Case manager consultations with participants must include:
 - a. interviews, evaluations, or assessments;
 - b. career planning informed by local labor market information;
 - c. review of ETP program performance information;
 - d. assessment of participant eligibility for training services based on:
 - i. conducted interviews, evaluations, or assessments and career planning

- ii. informed by local labor market;
 - iii. review of ETP program performance information; and
 - iv. other career service provided to participants;
- e. thorough documentation of consultations in participant NEworks case files, including documentation of participant eligibility for training services.
- 3. There is no requirement that career services be provided as a condition for receipt of training services. However, if career services *are not* provided before authorizing training services, case managers must *thoroughly* document in participant case files the circumstances that justify decisions to authorize training services without first providing career services.
- 4. During case manager consultations with Title I program participants, priority consideration must be given to programs that:
 - a. lead to recognized postsecondary credentials; and
 - b. align with in-demand occupations in the local area.
- 5. Unless Title I programs have exhausted training funds for a given program year, Title I programs must refer participants to their selected ETPL programs and establish ITAs.
- 6. Costs for training services paid through ITAs must be funded using out-of-school youth, adult, or dislocated worker program funds, depending on the program in which the participant is enrolled or co-enrolled.
- 7. GNWDB, in collaboration with one-stop delivery system partners, may coordinate funding of ITAs with funding from other Federal, state, local, or private job training programs or sources to assist participants with obtaining training services, subject to requirements established under 20 CFR 680.230.
- s. **description of the process used by the local board, consistent with WIOA Sec. 108(d), to provide a 30-day public comment period prior to submission of the plan, including an opportunity to have input into the development of the local plan, particularly for representatives of businesses, education, and labor organizations;**

Greater Nebraska published this plan for public comment with NDOL and was posted on NDOL public website on April 15, 2025. The local plan draft was also provided to the following informed parties on April 30, 2025, including representatives of all American Job Centers and affiliate One-Stop Centers; Nebraska Department of Education (including Migrant Education Program); and partner programs. The mandatory public comment period commenced on April 15, 2025, and concluded on May 15, 2025, with a formal public comment hearing on April 29, 2025. Public comments on the NDOL website were submitted to the Greater Nebraska email Inbox.

- t. **description of how one-stop centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by one-stop partners; and**

Greater Nebraska utilizes NEworks, Nebraska's management information system of record, to document all Title I program activities. NEworks is also used in whole or in part by other programs, including TAA and SNAP Next Step E&T. Additional partners are working with NDOL to determine how usage of the NEworks may benefit their program(s).

The Nebraska Economic Mobility Task Force is made up of front-line partner staff, including WIOA Title IB, SNAP Next Step E&T, Nebraska VR, NCBVI, TANF, and other workforce system partners. Through the work done by this task force, partners are able to identify best practices for co-enrollment/co-case management as well as existing policies and procedures that hinder coordinated service delivery. This information is provided to the state board's Alignment Workgroup, which is made up of program partner decision makers.

Greater Nebraska participates in the Alignment Workgroup established by the Nebraska Workforce Development Board. The workgroup is currently creating a common intake system to be used across the state by Title I and Partners.

- u. description of the direction given by the Governor and the local board to the one-stop operator to ensure priority for adult career and training services will be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA Sec. 134(c)(3)(E) and 20 CFR § 680.600.**

Greater Nebraska adheres to requirements established under Federal law, rules, and regulations, and state policy concerning priority of service. Refer to Section 2.a. below for additional information.

2. Pursuant to WIOA Sec. 108(b)(22), the local plan must include the following descriptions of local policies, procedures, and processes relating to:

- a. priority of service within the local one-stop delivery system for Veterans and covered persons;**

Veterans and eligible spouses of veterans receive priority of service in all WIOA Title IB programs. The process for identifying covered persons at the point of entry includes:

- Signage prominently posted at the point of entry indicating the individual's right to priority; and
- NEworks data collection for covered persons during registration.

As soon as one-stop center staff identify covered person status, they inform the individual of their entitlement to priority of service, explain services available to them under priority of service, and WIOA Adult, Dislocated Worker, and Youth program eligibility requirements.

- b. priority of service under Title I programs;**

Title I adult program

Title I adult programs must give priority for career services, training, and employment services to Veterans, eligible spouses of Veterans, and non-Veterans who are:

- recipients of public assistance;
- other low-income individuals; or
- individuals who are basic-skills deficient.

WIOA Sec. 134(c)(3)(E) states that priority of service for individualized career services and training services funded with Title I adult funds must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the local area.

Priority of service for eligible Title I adult program participants must be provided in the following order.

1. Veterans and eligible spouses of Veterans who are:
 - a. Recipients of public assistance;
 - b. Low-income; or
 - c. Basic skills deficient;
2. Individuals who are not Veterans and eligible spouses of Veterans but are:
 - a. Recipients of public assistance;
 - b. Low-income; or
 - c. Basic skills deficient;
3. Veterans and eligible spouses of Veterans who are not:
 - a. Recipients of public assistance;
 - b. Low-income; or
 - c. Basic skills deficient
4. Priority populations established by the local board
 - a. Individuals in households with a combined gross earned income of less than 250% of the federal poverty guidelines for the actual family size

5. to persons who are not:
 - a. Recipients of public assistance;
 - b. Low- income; or
 - c. Basic skills deficient.

Title I dislocated worker program

Services to eligible Dislocated Worker Program participants must be provided in the following order:

1. First, the individual must meet the eligibility criteria described in WIOA Section 3(15) (see the current Greater Nebraska Adult, DLW, & Youth Eligibility policy on dislocated worker eligibility); and
2. Second, if the individual meets the dislocated worker eligibility criteria and is a Veteran or eligible spouse of a Veteran, the individual must be given priority over dislocated workers who are non-Veterans.

Title I youth program

WIOA prioritizes expenditures and enrollment of individuals in the Youth Program:

- At least seventy-five (75) percent of Youth program funds must be spent to provide services to OSY; and
- All ISY must be low-income individuals, except as described below under section, Low-income Eligibility Exception for Youth.

c. Title I supportive services;

Supportive services are services that are reasonable and necessary to enable a participant to take part in career services, training services, or youth employment and training activities. Supportive services should not duplicate funds provided by another source. Participants in need of supportive services should be referred to other community resources before WIOA Title IB funds the service. It may be applicable to cost share with other service providers.

The frequency and utilization of supportive services is determined on an individual basis based on the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS). Supportive service dollars are not guaranteed as they are based on availability of program funds.

Supportive services are not intended to meet every need of the participant. Rather, they provide temporary assistance. For this reason, staff should assist the participant in developing a plan to cover the supported cost once WIOA Title IB funds are no longer appropriate for the individual.

Prior to submitting a supportive service request, the Case Manager must clearly document the following in a justification case note:

- What WIOA activity does this support service support?
- How does this help the participant in achieving their employment goal?
- How the obligation amount was determined?
- How long will WIOA Title IB assist the participant with this expense?
- How will the participant cover this cost after temporary funding?

The approving manager is responsible for ensuring all documentation is upload, correct, and legible before authorizing obligation and payment vouchers. All payments require adequate supporting documentation to justify the payment.

Payments are not allowed for:

- Expenses incurred prior to enrollment in a WIOA program
- Business start-up costs
- Gas vouchers

Greater Nebraska provides the following supportive services:

1. Transportation
2. Child / Dependent Care
3. Housing
4. Relocation Pre-employment Interviews
5. Education Testing
6. Training related applications/ tests/ certifications
7. Reasonable Accommodations for Individuals with Disabilities
8. Referrals to Health Care
9. Uniforms/ work attire/ work-related tools
10. Books/ fees/ school supplies
11. Needs-related payment

d. Title I follow up services;

Adults and dislocated worker participants

Follow up services must be made available for adults and dislocated workers who are placed in unsubsidized employment for up to 12 months after the first day of employment. All participants must be offered an opportunity to receive follow-up services unless the participant declines to receive follow-up services or the participant cannot be located or contacted. The type and intensity of follow-up services will vary for each participant as they are based off individual need.

Types of follow-up services must be based on the needs of adults and dislocated workers following placement in unsubsidized employment and may differ in order to assist with retention of unsubsidized employment. Follow-up services for adults and dislocated workers include but are not limited to:

1. counseling about the workplace, including counseling pertaining to maintenance or advancement in unsubsidized employment, consistent with individual strengths, resources, priorities, concerns, abilities, capabilities, and interests;
2. counseling on resolving work-related issues following placement in unsubsidized employment;
3. provision of referrals to other programs, services, and community resources to support retention in unsubsidized employment; and
4. provision of other forms of support pertaining to needs directly relating to retention in unsubsidized employment, such as assistance with costs of tools and uniforms and other types of services described above in Section III(b), excluding needs-related payments.
5. During follow-up, case managers should obtain information and acceptable source documentation when necessary to support performance reporting for adult and dislocated worker program outcomes.

Youth participants

Follow-up services are critical services provided following a youth's exit from the program to help ensure that youth are successful in employment and/or postsecondary education and training. Greater Nebraska provide follow-up services in accordance with [20 CFR 681.580](#), state policy, and Greater Nebraska policies on follow-up services for youth.. Requirements for the provision of follow-up services for youth are described below.¹

1. All youth participants must be offered an opportunity to receive follow-up services that align with their ISS. Types of follow-up services provided, and the duration of follow-up services must be determined based on the needs of the individual and, therefore, the type and intensity of follow-up services may differ for each participant.

¹ 20 CFR § 681.580(c); TEGL 21-16

2. At the time of enrollment, youth must be informed that follow-up services will be provided for a *minimum of 12 months following exit*. If, at any point during participation in the program or during the 12 months following exit, the youth participant requests to opt out of follow-up services, they may do so; and the participant's request to opt out or discontinue follow-up services must be documented in case notes.
3. Follow-up services must be provided to all participants for a minimum of 12 months after the last expected date of service in the local youth program, and any NDOL-administered programs in which the participant may be co-enrolled,² unless the participant declines to receive follow-up services or the participant cannot be located or contacted. Local programs must have policies in place to establish how to document and record when a participant cannot be located or contacted.
4. Follow-up services may begin immediately following the last expected date of service. The exit date is determined when the participant has not received services through the local youth program, or any NDOL-administered programs in which the participant may be co-enrolled, for 90 days and no additional services are scheduled.
5. When the following program elements are provided as follow-up services, they must be recorded as follow-up services in NEworks, rather than program services, in order to (a) clearly differentiate follow-up services from program services provided prior to program exit and (b) prevent a change in the exit date and trigger re-enrollment in the program:
 - a. supportive services;
 - b. adult mentoring;
 - c. financial literacy education;
 - d. services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
 - e. activities that help youth prepare for and transition to postsecondary education and training.

In addition, provision of youth program services must be documented in case notes, indicating which follow-up services were provided after program exit.

e. Title I incumbent worker training; and

IWT overview

IWT is training designed to meet the special requirements of an employer or group of employers. IWT must not be used to provide occupational training for new hires. IWT services may be provided to help avert potential layoffs of employees and assist employees in obtaining the skills necessary to retain employment, such as increasing skill level so they can be promoted within the company.

IWT services must be conducted with a commitment by the employer to retain or avert the layoffs of the workers training.

IWT funding

The local area may reserve up to 20 percent of their combined total of adult and dislocated worker allocations for a program year for IWT services. This 20 percent may be used for programmatic IWT activities. IWT administrative activities must be paid out of administrative funds.

² NDOL-administered programs means Title III Wagner-Peyser Employment Service, JVSG, TAA, and National Dislocated Worker Grant (DWG) programs. For information on co-enrollment, exit, and common exit, refer to the State's policy on performance accountability, which is included in the State policy manual. The State policy manual is accessible at <https://dol.nebraska.gov/ReemploymentServices/Training/WIOA/Policies>.

Employers participating in IWT must pay the non-Federal share of the cost of providing training to their incumbent workers. The minimum amount of the employer’s non-Federal share depends on the size of the employer and must not be less than:

- 10 percent of the costs, for employers with 50 or fewer workers;
- 25 percent of the costs, for employers with 51 to 100 workers; and
- 50 percent of the costs, for employers with more than 100 workers.

The employer share must be reported by the local board as program income in its quarterly financial reports.

f. Title I program waitlists.

As required under WIOA Secs. 129(c) and 134(b), local areas must provide Title IB youth services to eligible youth and Title IB employment and training activities to eligible adults and dislocated workers. During annual budget planning for an upcoming program year, the GNWDB:

- must prioritize planned funding for Title IB program services for eligible adults, dislocated workers, and youth; and
- must not prioritize use of adult and dislocated worker funds for planned funding of incumbent worker training or customized training services to employers, which are non- mandatory employer services, in a manner that jeopardizes the availability of Title IB program services.

Should Greater Nebraska predict during a given program year that funding for the provision of program services for eligible adults, dislocated workers, and youth may become limited, the GNWDB may establish waitlists for services. Only the GNWDB (not designees, including local administrative entity staff or service provider staff) is permitted to establish waitlists for one or more of Title IB programs, under the following limited circumstances:

- when funding is predicted to be insufficient during the remainder of the program year based on full analysis of local fiscal records for the impacted program(s); or
- unexpected economic conditions occurring in the local area.

Greater Nebraska must ensure written agreements with employers for incumbent worker and customized training services include provisions that allow the GNWDB to modify, suspend, or terminate the agreements due to changes in funding levels for adult and dislocated worker programs.

Greater Nebraska shall modify, suspend, or terminate written agreements with employers for incumbent worker and customized training services should it be identified that a funding shortage will impact services to participants. These funds shall be deobligated and the balance of the deobligated funds restored to the adult and dislocated worker programs to ensure the availability of funding and to ensure continued provision of program services for eligible adults and dislocated workers.

3. Comments submitted during the local-plan public comment period must be submitted with the local plan if they represent disagreement with the proposed plan.

Public comment period commenced on April 15, 2025 and concluded on May 15, 2025, with a formal public comment hearing on April 29, 2025 at the Beatrice AJC. There were no public comments at the Beatrice AJC. The only comments received were from Title II, see the summary below.

Comments were received from Title II and included suggestions to add Western Nebraska Community College and Crete Public schools to the list of education providers, question about the five industry sectors, comments on providing services to all counties across Nebraska through in-person classes, remote learning and distance education curricula providing easy access to adult education, comments about employer summits from 2023 and 2022, newly identified barriers, including Integrated Education and Training and Work Place Literacy, ABE and ELL referrals, and the inclusion of utilizing the adult education online student portal. Comments have been addressed and the plan has been revised accordingly.