**Greater Nebraska Workforce Development Area**

**Local Plan for Program Years 2021-2025**

**(July 1, 2021 – June 30, 2025)**

Describe the strategic vision of the local board to support regional economic growth and economic self-sufficiency, which must include goals that align with the goals and strategies defined in the current state plan or subsequent modification of the state plan for the following factors:

Greater Nebraska Workforce Development Board

**Mission**

To establish a workforce system that provides data-driven and employer-validated talent solutions through the integration of education, workforce, and economic development resources across systems

**Vision**

To deliver local coordinated, proactive, responsive and adaptable services for job seekers and employers to maximize opportunities for earning, learning, and living

Greater Nebraska recognizes and supports the State’s current vision to be a national model for the delivery of workforce development services. The Greater Nebraska Workforce Development Board’s strategy to fulfill this vision is to increase efforts to eliminate barriers for participants and businesses, provide the support businesses need to thrive, strengthen provider partnerships, and work toward system alignment with a goal of helping individuals and families achieve self-sufficiency while supplying businesses with a strong workforce.

Greater Nebraska will ensure focus areas and action items fall under one of the three following:

1. Coordinated partnerships focused toward working collaboratively, sharing information, and aligning policies across programs to ensure efficiency and enhanced access.
2. Data driven initiatives concentrated on the needs of employers and the community.
3. Continuous improvement to meet the changing needs of job seekers and employers.

In support of Nebraska’s two-part statewide goal, Greater Nebraska has identified the following objectives and action items for contributing to the achievement of this goal:

Selection and prioritization of development of career pathways

State 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, Tables 9 through 12 of Section II.1.A.

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

* Health Care and Social Assistance;
* Manufacturing;
* Educational Services;
* Information Technology; and
* additional industries essential to the economic vitality of each community.

State Goal: Identification of three or more barriers to participation in the selected and prioritized career pathways among job seekers and workers (including unemployed workers), Veterans, and individuals with barriers to employment.

Greater Nebraska will work to address barriers to enrollment by reducing paperwork, implementing remote processes, and creating a more efficient process for co-enrollment. All staff have been provided with laptops for greater mobility to meet with clients, which will allow teams to better serve individuals in rural areas.

The State of Nebraska will be implementing a Reentry Program Coordinator to strengthen service provision to justice involved individuals and better track the effectiveness of initiatives. Greater Nebraska staff have received training by Nebraska Department of Corrections and will be expanding services in partnership with the State’s Coordinator and additional staff to assist individuals with overcoming barriers related to background checks, lack of work history, and lack of resources.

The Greater Nebraska team is also part of the Nebraska Economic Mobility Task Force. This group brings partner staff together to address such issues as gaps in service, community needs, and potential solutions. In addition to participation in NEMTF, a work group will be convened to determine best practices to address known barriers as outlined in the State plan. This group will also work to learn hidden barriers

State Goal: Identification of five or more key barriers to participation in the selected and prioritized career pathways by employers and regional and local industry sector partnerships.

Greater Nebraska participates in business services groups, including EmployNebraska, which has local area chapters in Grand Island, Hastings, Kearney, Beatrice, Columbus, Norfolk, Sidney, and the Panhandle. These groups work with local areas businesses and schools to identify workforce needs. In addition to these efforts, business services groups will convene to determine best practices to address known barriers as outlined in the State plan. This group will also work to learn hidden barriers.

Alignment of the State’s workforce development system

State Goal: Coordination of workforce development activities

Greater Nebraska will work to coordinate with plan partners, community partners, and other local areas to develop a more efficient and effective system. This will include:

* coordination of workforce development activities and services statewide to maximize service delivery for job seekers, workers, and employers;
* process improvement projects to identify and remedy areas of inefficiency;
* implementation of technological resources that will support:
  + integration of supportive services available throughout the One-Stop delivery system;
  + participation in career pathway programs by job seekers, workers, employers, and industry sector partnerships

State Goal: Technology Integration

Greater Nebraska will work with the State and partners to identify and implement technological solutions, striving for efficiency and program alignment. Projects will include:

* working with partners to expand program use of NEworks. This includes training on NEworks features and testing to identify individual program and co-enrollment needs;
* implementation of mobile teams utilizing mobility kits;
* development of online enrollment processes.

State Goal: Common Intake System

One-Stop partners will be exploring ways to streamline and integrate initial intake processes. Greater Nebraska will work to reach efficiency and seamless service delivery in co-enrollment, and co-case management with all partner programs through:

* increased cross training;
* development of procedures for system usage;
* evaluation of program alignment;
* leveraging of common process to eliminate unnecessary action items; and
* identification and implementation of best practices to address areas of opportunity.

Greater Nebraska acknowledges the State is refining its common intake system technology. Greater Nebraska will readily support the implementation of such when available.

State Goal: Policy Development

Greater Nebraska will work to fully implement all State policies in a timely manner, in addition to updating or creating regional and local area policies that specify clear courses of actions, set clear expectations, guide decision-making and support outcomes. Policy coordination will occur among partners and other local areas.

Greater Nebraska is currently working to improve its monitoring policies to align with State guidelines and ensure a more comprehensive local area oversight.

State Goal: Online Resources

Greater Nebraska has greatly expanded its remote technological capabilities as a result of the pandemic allowing reemployment services to better serve previously underserved populations in rural areas. Greater Nebraska will work to increase mobile access to programs and staff through the support and development of:

* remote Reemployment Services presentations;
* online program orientation;
* accessible and fillable enrollment forms;
* initiatives geared toward increasing technological access in remote areas, including expanding services provided through partnerships with public libraries.

State Goal: Cross Training and Technical Assistance

*Cross Training*

Greater Nebraska will work with the State and all partners to develop, implement, and expand cross-training. At the time of writing, Greater Nebraska is planning a seminar on co-enrollment and co-case management to be held in March of 2021, which will include partner program staff. This seminar will be followed by online presentations focused on reemployment services, which will be open to job seekers, employers, and partners.

The Greater Nebraska Workforce Development Board has contracted with Nebraska Department of Labor to hire a One-Stop Operator. A key component of this person’s duties will be to ensure all partners are cross trained and receive continuous training opportunities for stronger partnerships and a more effective workforce system.

*Technical Assistance*

Greater Nebraska will continue to host TA calls with WIOA staff monthly, covering issues affecting performance, collaborative opportunities, and reinforcement of or changes to processes. To increase collaboration and coordination, these calls will be expanded beyond WIOA staff to include other Title I and partner programs in which participants can and should be co-enrolled accordingly.

State Goal: Co-enrollment

Greater Nebraska will work with all partners to align programs and reduce barriers to co-enrollment and co-case management. Referral processes will be tested and refined for easier connection to partner programs. Teams will meet regularly to examine processes for simplification and alignment. Co-enrollments in partner programs are and will continue to be reported to the Greater Nebraska Workforce Development Board, along with suggestions for policy and procedural changes. The Columbus office has seen great success with the WIOA and SNAP Next Step partnership at 76.6% co-enrollment. This partnership is currently being expanded to include TANF. Lessons learned, such as team bonding, treating all goals as team goals, presentation of co-enrollment, and coordinating communication with clients, are currently and will continue to be shared with other local areas and partners.

State Goal: Public Sector Partnership

Greater Nebraska will contribute toward, and work to implement, strategies identified by the Nebraska Partner Council, including:

* coordination with local workforce development areas to strengthen workforce system alignment;
* targeted outreach to disadvantaged populations;
* continuous improvement; and
* alignment of systems.

As part of a coordinated approach to workforce development, the plan partners will meet regularly for planning purposes, information sharing, resource coordination and continuous workforce system improvement.

1. preparing an educated and skilled workforce (including youth and individuals with barriers to employment); and

With the growth of business needs outpacing the flow of workers in all Greater Nebraska economic areas of concentration ([NEworks - Nebraska Labor Availability Study Publications](https://neworks.nebraska.gov/gsipub/index.asp?docid=802)), the Board’s strategies to support regional economic growth and economic self-sufficiency will focus dually on the needs of employers and preparing individuals to meet those needs. The Greater Nebraska Workforce Development Board’s goals are designed to facilitate a staff approach to meeting people where they are, connecting them with opportunities to increase their skills, and putting them on a path to self-sufficiency. Greater Nebraska staff are prepared to help individuals achieve their career goals through the path best suited to them.

Partnerships between programs, education, and workforce will continue to be developed to provide youth with the support they need to enter the workforce and continue to grow, becoming contributing members to the economic growth of their communities. Through relationships such as Nebraska Department of Education Career and Technical Education (CTE) and other local area secondary school programming, Greater Nebraska will expand its offerings to further connect with youth to provide work based learning, labor market information, and supportive services.

Example: Grand Island Public Schools offers students Career Pathways (Apprenticeships), partnering with Greater Nebraska staff to provide the participant with supportive services and the employer with OJT wage reimbursement.

In collaboration with EmployNebraska groups, NDCS, TANF, SNAP Next Step E&T, homeless services, Veteran transition service providers, literacy programs, providers of disability services and other partners, Greater Nebraska works to effectively serve individuals with barriers to employment. Staff work with each participant to identify barriers that may prevent the individual from successfully completing training or obtaining and maintaining employment and develop a plan to overcome those barriers through program support, co-enrollment, and referrals. Greater Nebraska will continue these partnerships with a goal of moving individuals and families toward self-sufficiency and stability.

Example: Greater Nebraska’s North Platte office has created a relationship with Families First Partnership in North Platte/Lincoln County. Individuals who request supportive services from Families First are connected with Reemployment Services Coordinators at the North Platte office to begin working on steps to a stable income. When appropriate, the individual is further connected with SNAP Next Step and other partners for co-enrollment.

Greater Nebraska’s relationships with post-secondary institutions, short term training providers, and employers provide participants with a range of occupational skills and on the job training opportunities in all industries. Nebraska has a strong and innovative community college system, which provides participants with a supportive and engaging learning environment. The colleges are responsive to sector-based initiatives throughout Nebraska, ensuring coursework is relevant to industry needs.

Example: Greater Nebraska staff have partnered with Nebraska Vocational Rehabilitation to provide individuals with the preparation they need to apply for status as a Journeyman. Vocational Rehab assists these individuals with the cost of training at Central Community College, while Greater Nebraska staff provide OJT placement with employers. Central Community College has developed a program focused on helping the individual be successful on their career path, without unnecessary courses. This model will be replicated in other areas and industries.

### **relating to the performance accountability measures based on the performance indicators described in 20 CFR § 677.155(a)(1).**

Greater Nebraska leverages community partnerships and business relationships to address the needs of youth and individuals with high barriers to employment. Collaborative relationships with co-enrollment partners and resources are fostered to ensure performance is achieved. WIOA and SNAP Next Step are currently working toward the alignment of processes and performance measures, including the timing and definition of a successful exit, to improve performance for both programs. This model will be expanded to TANF and other partners.

The Greater Nebraska Workforce Development Board and subcommittees regularly review performance, identifying areas of opportunity. The Strategic Planning committee will utilize data to identify employer needs, anticipate industry growth, and determine strategies and focus areas for talent development. The System Performance committee will expand its review of the data to include identification of best practices and mobile accessibility to programs and services to support the State’s vision of becoming a national model. The Board will prioritize funding based on the needs of the community and in relation to performance measures to ensure program staff are able to implement appropriate services with the highest impact.

Taking into account the analyses described in Section 1 for regional plan elements, describe the local board’s strategy to:

1. work with entities that carry out core programs and required One-Stop partner programs in the local area to align resources available to the statewide planning region and the local area; and

Cooperation, collaboration, and coordination will continue to be key themes of the Greater Nebraska Workforce Development Board. Greater Nebraska will focus efforts toward the alignment of programs, including leveraging of resources, definition of success, and coordinated participant exit. Workforce system strategies include expanding active outreach to individuals with disabilities, Veterans, youth, English language learners, and other target populations to make them aware of services. Additionally, partners will work to develop a co-case management process that will provide for more effective coordination of resources. Each partner commits to cross-training of staff, as appropriate, and to providing other professional learning opportunities that promote continuous quality improvement. The Board will review reports of activities regularly to identify progress and areas of opportunity.

The One-Stop Operator will work with partners across the system to ensure referrals are substantive and appropriate, in addition to coordinating cross training and ongoing communication. The OSO will convene partners to facilitate integrated partnerships that seamlessly incorporate services for the common customers served by multiple program partners of the American Job Center (AJC). The Board will determine One-Stop Operator activities and outreach based on analysis of community, employer, and job seeker needs.

1. achieve the strategic vision and goals described directly above in Section 1 for local plan elements.[[1]](#footnote-1)

The Greater Nebraska Workforce Development Board will capitalize and expand on existing partnerships to develop specific action items in its strategy to support regional economic growth and economic self-sufficiency. Data sources including labor market information, Rural Prosperity Nebraska (<https://ruralprosperityne.unl.edu>), studies provided by Nebraska Department of Labor, and other resources will be used to drive decision making.

Greater Nebraska will involve business, partners, and other stakeholders every step of the way. Work will continue to strengthen existing sector partnerships focused on Manufacturing and Healthcare. Additional initiatives will incorporate STEM careers and awareness of growth opportunities.

Describe the *workforce development* system in the local area, including:

The AJC network includes six core programs: Title I Adult, Dislocated Worker, and Youth programs; the Title II Adult Education and Family Literacy Act (AEFLA) program; the Wagner-Peyser Act Employment Service (ES) program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA; and the Vocational Rehabilitation (VR) program, authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV of WIOA. The AJC network also includes other required and additional partners identified in WIOA. Through the American Job Centers, these partner programs and their direct service providers ensure businesses and all job seekers—a shared client base across the multiple programs—have access to information and services that lead to positive educational and employment outcomes. Greater Nebraska AJCs and partner staff strive to:

* Provide job seekers with the skills and credentials necessary to secure and advance in employment with wages that sustain themselves and their families;
* 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;
* 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. Examples may 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.
* Participate in rigorous evaluations that support continuous improvement of AJCs by identifying which strategies work better for different populations; and
* Ensure that high-quality integrated data informs decisions made by policy makers, employers, and job seekers.

The management of the AJC network is the shared responsibility of the local Greater Nebraska Workforce Development Board (GNWDB), the Chief Elected Officials Board (CEOB), the six WIOA core program partners, required One-Stop partners and other additional One-Stop partners, AJC operators, and service providers. Through the AJC, the One-Stop operator carries out the activities described below.

* Facilitates integrated partnerships that seamlessly incorporate services for the common customers served by multiple program partners of the AJC
* Develops and implements operational policies that reflect an integrated system of performance, communication, and case management
* Uses technology to achieve integration and expanded service offerings
* Organizes and integrates AJC services by function (rather than by program), when permitted by a program’s authorizing statute and, as appropriate, through coordinating staff communication, capacity building, and training efforts. Functional alignment includes having AJC staff who perform similar tasks serve on relevant functional teams (e.g., skills development teams or business services teams)
* Service integration focuses on serving all customers seamlessly (including targeted populations) by providing a full range of services staff

1. the partners and programs that are included in the *workforce development* system;[[2]](#footnote-2) and

Greater Nebraska has a fully integrated system involving Title I Adult, Dislocated Worker, and Youth program, National Dislocated Worker Grant, Wagner-Peyser, TAA, and RESEA. Unemployment Insurance, Nebraska Vocational Rehabilitation, and SNAP Next Step E&T are collocated in most offices, with plans for expansion. Strong relationships exist through direct linkage to colleges within the Nebraska Community College Association, Nebraska Department of Education (Carl D. Perkins), Community Action Partnerships (CDBG), and Title II Adult Education and Family Literacy Act (AEFLA) program. Greater Nebraska staff provide services within the correctional system to help prepare individuals returning to the community and workforce. Community partners include TANF and Bring Up Nebraska, focused toward helping families reach self-sufficiency; and EmployNebraska, focused toward connecting employers with job seekers.

1. how the local board will work with the entities carrying out core programs and other One-Stop partner programs to support service alignment, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC 2301 et seq.).[[3]](#footnote-3)

The Greater Nebraska Workforce Development Board System Coordination Committee acts to align and leverage services and resources of WIOA core and partner programs, prevent duplication of services, monitor One-Stop System performance, and form strategies to ensure continuous improvement of the system. The Board will convene with core programs and other One-Stop partners to work toward service alignment and creation of workforce strategies. The Board 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 Title I and Wagner-Peyser programs coordinate workforce services geared toward Nebraska secondary and postsecondary schools with Nebraska Department of Education under the Carl D. Perkins Career and Technical Education act. The reVISION program links schools with career education and industry professionals, providing educators 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’s plan, including the promotion and alignment of programming targeting occupations leading to family-sustaining wages, as outlined in the Nebraska Perkins V State Plan. Several strategies include:

* Industry sector partnerships
* Public sector partnerships
* Promoting career pathways, including career readiness
* Focusing on high-demand industry sectors and occupations during the provision of career

services

* Increasing co-enrollment of program participants and coordinating funding across partner

programs

* Expanding work-based learning opportunities, including apprenticeships, and
* Implementing joint partner initiatives

Describe the *One-Stop delivery* system in the local area, including:

The Greater Nebraska One-Stop system is comprised of full service American Job Centers as well as a network of other service delivery points. There are two (2) comprehensive American Job Centers and ten (10) Nebraska Department of Labor (NDOL) offices throughout the 88 county region.

The Beatrice American Job Center is located in Southeast Nebraska. Reemployment services include Title I Adult, Dislocated Worker, and Youth programs; Trade Adjustment Assistance; National Dislocated Worker Grant program; Jobs for Veterans State Grants; Wagner-Peyser Act Employment Services and Unemployment Insurance. Nebraska Vocational Rehabilitation is collocated and direct linkages are provided to Title II Adult Education and Family Literacy Act program; the Nebraska Community College System; SNAP; TANF; SCSEP; Pine Ridge Job Corps; Ponca and Winnebago Tribes; Fairbury Housing Authority; and Blue Valley Community Action Partnership (CSBG). The Regional Manager of this center also oversees the Nebraska City affiliate site and provision of services at Nebraska Correctional Center for Women.

The Grand Island American Job Center is located in Central Nebraska. Reemployment services include Title I Adult, Dislocated Worker, and Youth programs; Trade Adjustment Assistance; National Dislocated Worker Grant program; Jobs for Veterans State Grants; Wagner-Peyser Act Employment Services and Unemployment Insurance. Collocated partners include SNAP Employment and Training; SCSEP; and Nebraska Vocational Rehabilitation. Direct linkages are provided to Title II Adult Education and Family Literacy Act program; the Nebraska Community College System; SNAP; TANF; Pine Ridge Job Corps; Ponca and Winnebago Tribes; and Central Nebraska Community Action Partnership (CSBG). The Regional Manager of this center also oversees the Hastings and Kearney affiliate sites.

The AJC network includes six core programs: Title I Adult, Dislocated Worker, and Youth programs; the Title II Adult Education and Family Literacy Act (AEFLA) program; the Wagner-Peyser Act Employment Service (ES) program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA; and the Vocational Rehabilitation (VR) program, authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV of WIOA. The AJC network also includes other required and additional partners identified in WIOA. Through the American Job Centers, these partner programs and their direct service providers ensure businesses and all job seekers—a shared client base across the multiple programs—have access to information and services that lead to positive educational and employment outcomes. Greater Nebraska AJCs and partner staff strive to:

* Provide job seekers with the skills and credentials necessary to secure and advance in employment with wages that sustain themselves and their families;
* 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;
* 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. Examples may 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.
* Participate in rigorous evaluations that support continuous improvement of AJCs by identifying which strategies work better for different populations; and
* Ensure that high-quality integrated data informs decisions made by policy makers, employers, and job seekers.

The management of the AJC network is the shared responsibility of the local Greater Nebraska Workforce Development Board (GNWDB), the Chief Elected Officials Board (CEOB), the six WIOA core program partners, required One-Stop partners and other additional One-Stop partners, AJC operators, and service providers. Through the AJC, the duties of the One-Stop operator include:

* Facilitation of integrated partnerships that seamlessly incorporate services for the common customers served by multiple program partners of the AJC;
* Development and implementation of operational policies that reflect an integrated system of performance, communication, and case management;
* Use of technology to achieve integration and expanded service offerings;
* Organization and integration of AJC services by function (rather than by program), when permitted by a program’s authorizing statute and, as appropriate, through coordinating staff communication, capacity building, and training efforts. Functional alignment includes having AJC staff who perform similar tasks serve on relevant functional teams (e.g., skills development teams or business services teams); and
* Service integration focused on serving all customers seamlessly (including targeted populations) by providing a full range of services staff.

| **Partner Program** | **Partner Organization** |
| --- | --- |
| Adult, DLW, & Youth WIOA Programs | Nebraska Department of Labor |
| Jobs for Veterans' State Grants | Nebraska Department of Labor |
| Wagner-Peyser Employment Services | Nebraska Department of Labor |
| Trade Adjustment Assistance | Nebraska Department of Labor |
| Unemployment Insurance | Nebraska Department of Labor |
| National Dislocated Worker Grants | Nebraska Department of Labor |
| Adult Education & Adult Secondary Education | Central Community College |
| Adult Education & Adult Secondary Education | Western Nebraska Community College |
| Adult Education & Adult Secondary Education | Northeast Community College |
| Adult Education & Adult Secondary Education | Southeast Community College |
| Adult Education & Adult Secondary Education | Mid-Plains Community College |
| Vocational Rehabilitation | Nebraska VR |
| Commission for the Blind & Visually Impaired | Nebraska Commission for the Blind and Visually Impaired |
| Senior Community Service Employment Program | National Able Network/ Nebraska Department of Health and Human Services |
| Temporary Assistance for Needy Families | Nebraska Department of Health and Human Services |
| Job Corps | CHP International / Pine Ridge Job Corps Center |
| Migrant and Seasonal Farmworker Programs | Proteus, Inc. |
| Native American Programs | Ponca Tribe |
| Native American Programs | Winnebago Tribe |
| Career and Technical Education Programs at the Postsecondary Level | Central Community College |
| Career and Technical Education Programs at the Postsecondary Level | Western Nebraska Community College |
| Career and Technical Education Programs at the Postsecondary Level | Northeast Community College |
| Career and Technical Education Programs at the Postsecondary Level | Mid-Plains Community College |
| Career and Technical Education Programs at the Postsecondary Level | Southeast Community College |
| Employment and Training Activities Carried Out Under the Community Services Block Grant | Blue Valley Community Action Partnership |
| Employment and Training Activities Carried Out Under the Community Services Block Grant | Central Nebraska Community Action Partnership, Inc. |
| Employment and Training Activities Carried Out Under the Community Services Block Grant | Community Action Partnership of Mid Nebraska |
| Employment and Training Activities Carried Out Under the Community Services Block Grant | Northwest Community Action Partnership |
| Employment and Training Activities Carried Out Under the Community Services Block Grant | Community Action Partnership of Western Nebraska |

1. how the local board will ensure the continuous improvement of providers in the *One-Stop delivery* system and ensure that the providers will meet the employment needs of local employers, workers, and job seekers;[[4]](#footnote-4)

The Greater Nebraska Workforce Development Board is committed to continuous improvement, as are the workforce partners. The Board monitors the effectiveness of the local workforce system through regular committee meetings and report outs of performance, enrollments, compliance, and customer satisfaction. The Board has established the following to track and assure continuous improvement:

* The System Coordination Committee acts to align and leverage services and resources of WIOA core and partner programs, monitor One-Stop System performance, and form strategies to ensure continuous improvement of the system.
* The Strategic Planning Committee guides employer engagement, sector strategies, and development of career pathways, in addition to monitoring of program finances and the One-Stop System.

One-Stop Operator Activities:

* Joint planning, policy development, and system design processes to ensure delivery of integrated services, program alignment, a multi-entry or “no wrong door” approach, and elimination of duplication;
* Regular evaluation of the availability of career services and referrals to system partners;
* Accessibility and effectiveness of service provision to populations with barriers to employment, veterans, and employers;
* Development and implementation of effective communication tools to increase information sharing and collaboration with the partners;
* Collection and evaluation of input from customers, employers, internal partners, and community partners to develop specific improvement strategies;
* Participation in regularly scheduled partner meetings, local area task forces, and other collaborative opportunities to exchange information and encourage program and staff integration.

Activities the board will participate in to ensure that service providers are meeting the needs of local employers include:

* Reviewing labor market trends to anticipate employer needs;
* Evaluating workforce system performance measures;
* Reviewing the employer satisfaction surveys;
* Use of data to drive strategic planning and operational efficiency.

Activities the board will participate in to ensure that service providers are meeting the needs of local workers and job seekers include:

* Increase co-enrollments in partner programs,
* Reviewing the customer satisfaction surveys,
* Developing and using co-enrollment, assessment, referral, and case management processes.
* Expand work-based learning to improve access to employment that concurrently prepares individuals with the skills needed for employment.

The Greater Nebraska Workforce Development Board will also review results of local, state, and federal monitoring. The respective programs will be expected to meet monthly QA review (internal audit) and quarterly data validation requirements to ensure all information entered into NEworks is accurate and documented in the customer file. When services are not meeting the needs of local employers, workers, job seekers, or partners, the board will work with the Administrative Entity to create a corrective action plan.

1. how the local board will facilitate access to services provided through the *One-Stop delivery* system through the use of technology and other means, including access in remote areas;[[5]](#footnote-5)

The Greater Nebraska Workforce Development Board will work with the Greater Nebraska team to develop mobile processes and expand access to the One-Stop system. Staff will be equipped with needed equipment and support to increase outreach and service delivery efforts to remote areas. Partners and libraries will be connected with the workforce 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 be available online via the dol.nebraska.gov website and social media platforms. The State of Nebraska Department of Labor is currently working toward making available a reentry component of NEworks, which will allow staff to provide individuals currently incarcerated with almost all the same services available in the centers. Additional initiatives include identification of virtual hiring event best practices and expansion of this tool to better serve employers and job seekers.

The partners of the AJC will make accessibility of basic, individualized, follow up and any other services available through the one-stop delivery system. All services will be made available to those individuals with the greatest barriers to employment, to include individuals with disabilities.

Direct access to the partners will be made available at the AJC through real-time technology via direct linkage, whenever the partner services are not made available on site.

The One-Stop Operator’s responsibilities include the organization and coordination partner staff in order to optimize and streamline service delivery efforts. Operational policies that reflect an integrated system of performance, communication, and case management, including uses of technology to achieve integration and expanded service offerings will be created and implemented.

1. 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 the provision of staff training and support for addressing the needs of individuals with disabilities;[[6]](#footnote-6) and

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. Each site is equipped with assistive technology for individuals with visual and/or mobility impairments.

Nebraska Vocational Rehabilitation is collocated at both Greater Nebraska Comprehensive American Job Centers and direct linkage has been established with Nebraska Commission for the Blind and Visually Impaired. These partnerships will enable the One-Stop system to utilize their expertise to help identify issues and develop strategies for correcting any access issues to programs and facilities including training of staff.

All centers will work proactively with community partners who have specialized training and/or expertise regarding the design of services for individuals with disabilities to improve upon adaptive service offerings. Referral processes and resource lists will be implemented to quickly connect individuals with accommodations.

At point of entry, all customers will be provided the notice of Equal Employment Opportunity rights and grievance procedures to ensure Greater Nebraska is in compliance with 20 CFR 683.600. Currently, documentation is scanned into the State’s documents manager. The Greater Nebraska Workforce Development Board will work with Nebraska Department of Labor to implement a more efficient technology based acknowledgement of these rights and procedures.

Greater Nebraska utilizes Language Line for individuals who are not fluent in English.

1. roles and resource contributions of the One-Stop partners.[[7]](#footnote-7)

In accordance with 20 CFR 678.420, each of the required One-Stop partners (Title I Adult, Dislocated Worker, and Youth programs; the Title II Adult Education and Family Literacy Act (AEFLA) program; the Wagner-Peyser Act Employment Service (ES) program, and Vocational Rehabilitation) contributes funds toward the provision of career services, collaboration with Workforce Development Boards, and the One-Stop delivery system. Required One-Stop providers and other partners are working toward full integration of all services available throughout the One-Stop delivery system.

|  |  |  |
| --- | --- | --- |
| **Partner Program** | **Partner Entity** | **Services/Resources** |
| Wagner-Peyser Employment Services | Nebraska Department of Labor | Business and Job Seeker services |
| Adult, DLW, Youth | Nebraska Department of Labor | Resources for training and employment |
| Trade Adjustment Assistance | Nebraska Department of Labor | Resources for training and employment |
| Jobs for Veterans State Grant | Nebraska Department of Labor | Veterans’ services: Local Veterans’ Employment Representative; Disabled Veterans’ Outreach Program |
| Unemployment Insurance | Nebraska Department of Labor | Unemployment benefits |
| Adult Education | Nebraska Department of Education;  Central Community College; Northeast Community College; Southeast Community College; Mid-Plains Community College | Adult education and skills development |
| Vocational Rehabilitation | Nebraska VR;  Nebraska Commission for the Blind and Visually Impaired | Job training, employment accommodations, skills coaching  Accessibility training for staff |
| TANF | Nebraska Department of Health and Human Services | Resources for training and employment |
| SNAP Next Step E&T | Nebraska Department of Health and Human Services | Resources for training and employment |
| Career and Technical Education (Perkins) | 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 |
| Community Services Block Grant (CSBG) | 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 |
| Housing and Urban Development (HUD) | Fairbury Housing Authority;  Scotts Bluff County Housing Authority | Housing services |
| Job Corps | Pine Ridge Job Corps | Residential education and job training |
| Migrant and Seasonal Farmworker | Proteus | Job training, health care, education assistance |
| Native American Programs | Ponca Tribe  Winnebago Tribe | Health services, social services, education |
| Second Chance Act | Siouxland Human Investment Partnership | Reentry Employment Opportunities |
| Senior Community Services Employment | National Able Network | Resources for training and employment |

Describe how the local board will work with entities carrying out the core programs to:[[8]](#footnote-8)

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

The Greater Nebraska Workforce Development Board 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 Board 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 will 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 Workforce Center, there are several counties that are underserved. Greater Nebraska staff have recently been fully equipped with laptops and will 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 to capitalize on the strengths and capacity of all core partners.

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

* Bring Up Nebraska – Partnerships with community collaboratives under the Bring Up Nebraska umbrella will be established to provide services to individuals in need of income stability.
* 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.
* Reentry – Staff have been trained by the Nebraska Department of Corrections and cleared to expand service offerings within the walls of the institutions. As COVID measures are reduced, Greater Nebraska staff will work with the State Reentry Program Coordinator to coordinate service delivery.
* Homeless services – The Board 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.

1. facilitate the development of career pathways, in accordance with the goals and strategies defined in the state plan and subsequent modifications of the state plan, and co-enrollment in the core programs; and

The Greater Nebraska Workforce Development Board 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 Board for consideration of new or enhanced Sector Partnerships, including the development of career pathways. BSRs will provide feedback from businesses to the Board to help guide decisions. Trend analysis of location quotients and other labor market data will provide the Board 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 on career pathways most relevant and beneficial to Nebraska businesses and job seekers.

At the time of writing, Greater Nebraska Title I and Title III staff were recruiting job seekers and employers for a pilot partnership with Facebook Career Connections. This opportunity was also made available through Title II and Title IV programs. Through this program, participants are enrolled into WIOA Title I Adult and Youth and receive six weeks of training on digital marketing through LinkedIn, followed by 12 weeks of work experience/transitional jobs, and concluding with an industry recognized certificate. Recruitment has involved partners to identify individuals for co-enrollment into WIOA.

The Nebraska Department of Economic Development (DED) currently supports, with the aid of lead and local boards, five Next Generation Sector Partnerships. Next Generation Sector Partnerships are comprised of businesses, from the same industry and in a shared labor market region, who work with education, workforce, economic development and community organizations to address the workforce and other competitiveness needs of the targeted industry. There are two active manufacturing partnerships in Central and Northeast Nebraska, and over 120 business leaders and public partners working together to creatively problem-solve and grow their industry and region. Additional initiatives include Healthcare in the Northeast, Southeast, and Panhandle regions. Greater Nebraska will work to expand these initiatives to the Tech Sector in efforts to proactively keep talent in the State of Nebraska.

Additional career pathways partnerships include:

* + Aksarben Foundation – Priority initiatives include:  Regional efforts in Northeast and Central Nebraska, as well as a technology collaborative and a transportation and trade initiative.
  + Blueprint Nebraska – Strategic initiatives include: leading job growth, quality of life, building the population of 18-34 year olds, leading income growth, and increasing research and development investment.
  + Nebraska Tech Collaborative – business led, and comprised of over 100 business, government, education, and non-profit partners all working together to drive results and scale to build a world class tech ecosystem in Nebraska.
  + existing industry sector partnerships.

1. 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 Board will 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 aide 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 drive discussions to identify, prioritize, and take action to address sector and career pathway needs.

Describe the strategies and services that will be used in the local area:[[9]](#footnote-9)

1. to facilitate employer engagement with *workforce development* programs, including engagement of 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. Greater Nebraska will also expand initiatives to that of technology through a partnership with Nebraska Tech Collaborative.

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.

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.

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

Greater Nebraska 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.

1. 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:

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

1. to strengthen linkages between the local *One-Stop delivery* system and the Nebraska’s 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 collocated 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.

Collocation of Unemployment Insurance (UI) staff has created a stronger partnership between unemployment and One-Stop partners. 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 to help facilitate better customer service.

All UI claimants are required to participate in Nebraska Re-employment Services. The program, also called 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 information about One-Stop partner programs, 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 career centers, not just UI services. A reemployment services presentation is currently in development. This presentation will be made available on resource room computers, to partners, via social media, and other avenues to educate claimants on all programs and services available through the One-Stop. The One-Stop Operator will also be implementing the provision of a handbook outlining all programs and services, which will be made available through these same channels.

1. that may include the implementation of initiatives (which must support the strategies described above in Sections 6.a. through 6.d.), 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.

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: new and customized training options, incumbent worker training, 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.gov 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 onto 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 the region’s target industries. Additional commitment to expanding work-based learning (including on-the-job training, registered apprenticeships, transitional jobs, customized training, work experience, job shadowing, and pre-apprenticeship) with a goal of reaching a 35% caseload in the WIOA Title 1B program by June 30, 2021. *Update: COVID hindered progress toward this goal. However, there has been promising movement in this direction, particularly in the Grand Island and Hastings areas. This goal will remain a part of the plan with a new target date of June 30, 2025*

Describe 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.[[10]](#footnote-10)

This is an area of opportunity for Greater Nebraska. Under guidance from the Greater Nebraska Workforce Development Board, 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.

Greater Nebraska’s Sidney office is relocating to Western Community College in late 2021 and will be located next to the Innovation and Entrepreneurship Center. With the merger of Cabela’s with Bass Pro Shops in 2017, many high skilled workers have struggled to find suitable employment, leaving them to take lower paying jobs or relocate to other communities. This move will strengthen the collaborative approach toward the provision of ongoing entrepreneurial training and assistance throughout the area.

Partners in these efforts include:

* WIOA Title I – Adult, Dislocated Worker, and Youth
* Title IV – Nebraska Vocational Rehabilitation and Nebraska Commission for the Blind and Visually Impaired
* Community Colleges – Western Nebraska Community College
* University of Nebraska – Lincoln Center for Entrepreneurship

Describe and assess the type and availability of adult and dislocated worker employment and training activities in the local area.[[11]](#footnote-11)

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 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.

Adult and DLW 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 (DLW) within AJCs and career 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.

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| **Basic Career Services** |
| Outreach, intake, and orientation of information and other services available through the One-Stop delivery system |
| Opportunity to initiate an application for Temporary Assistance for Needy Families assistance and non-assistance benefits and services |
| Determination of eligibility for WIOA Adult and Dislocated Worker services |
| Initial assessment of skills including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities, and supportive service’s needs |
| Labor exchange services, including job search and placement assistance and career counseling. Information will include in-demand industry sectors and nontraditional employment |
| Referrals to and coordination of activities with other programs and services |
| Provision of workforce and labor market employment data, including provision of accurate information relating to local, regional, and national labor market areas |
| Provision of performance and program cost information on eligible providers of training services by program and type of providers |
| Provision of information on local performance accountability measures and any additional performance information relating to the area’s One-Stop delivery system |
| Provision of information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation |
| Provision of information relating to the availability of supportive services or assistance and appropriate referrals, including: child care, child support, medical or child health assistance available through Nebraska’s Medicaid program and Children’s Health Insurance Program, benefits under Supplemental Nutrition Assistance Program, earned income tax credit, and assistance under a state program for TANF and other supportive services and transportation provided through that program |
| Assistance in establishing eligibility for financial aid assistance for training and education programs not provided under WIOA |
|  |
| **Individualized Career Services** |
| Comprehensive and specialized assessments of skill level and service needs |
| Individual Employment Plan to identify employment goals, appropriate achievement objectives, and appropriate combination of services |
| Group counseling |
| Individual counseling |
| Career planning |
| Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct |
| Job readiness preparation that provides basic academic skills, critical thinking skills, digital literacy, and self-management skills, including competencies in utilizing resources |
| Internships and work experiences that are linked to careers, including transitional jobs |
| Workforce preparation activities |
| Financial literacy services |
| Out-of-area job search assistance and relocation assistance |
| English language acquisition and integrated education and training programs |

**Follow-up Services**

Greater Nebraska provides follow-up services for adults and dislocated workers for a minimum of 12 months after the first date of employment. Follow-up services vary by type and intensity as they are based on the individual needs of each participant, but may include referrals for supportive services, job search assistance, and job retention coaching.

Describe how the local board will coordinate workforce investment activities carried out in the local area with statewide Rapid Response activities.[[12]](#footnote-12)

All Rapid Response activities will be reported to the Greater Nebraska Workforce Development Board. If current investment activities do not support the current need, the Board will convene to set aside specific funds for activities including layoff aversion strategies such as incumbent worker training and customized training. Greater Nebraska will ensure that:

* If a local representative becomes aware of a potential layoff or closure, they will notify the State via NDOL.RapidResponse@nebraska.gov.
* A representative of the dislocated worker program provides program specific information at all onsite meetings.
* When an onsite meeting cannot be arranged, content for outreach to employees and employers is provided to the Rapid Response Unit.
* The One-Stop Center or affiliated site will provide additional follow-up with employees to connect them with appropriate and requested resources.
* Workshops and career fairs, based on identified affected workforce needs, are coordinated in partnership with the Wagner-Peyser Program.
* Additional community resources, outside of the mandated partners, are identified.

In cases where a Rapid Response event is not held, the local area office will promote and host a community presentation to market reemployment services available to job seekers. Furthermore, staff will receive comprehensive training on layoff aversion strategies in order to identify appropriate opportunities and respond with effective strategies.

Describe and assess 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 identification of successful models of such activities.[[13]](#footnote-13)

Greater Nebraska strives to serve all youth through an integrated service delivery system. Partnerships with organizations including Nebraska Vocational Rehabilitation and Nebraska Commission for the Blind and Visually Impaired 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, on the job training, job shadowing, pre-apprenticeships, apprenticeships, and customized training.

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

Greater Nebraska provides all youth with the 14 youth program elements as described in the State plan:

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| **WIOA 14 Youth Program Elements** |
| Tutoring, study skills training, instruction, and dropout prevention activities |
| Alternative secondary school and dropout recovery services |
| Paid and unpaid work experience |
| Occupational Skills Training (OST) |
| Education offered concurrently with workforce preparation |
| Leadership development opportunities |
| Supportive services |
| Adult mentoring |
| Follow-up services |
| Comprehensive Guidance and Counseling |
| Financial literacy education |
| Entrepreneurial skills training |
| Services that provide labor market information |
| Postsecondary Preparation and Transition Activities |

Describe how the local board will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to align strategies, enhance services, and avoid duplication of services.[[14]](#footnote-14)

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 of Grand Island Public Schools are connected with the Grand Island American Job Center 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 Board will make every effort to support community college proposals for grants and attempts to integrate services into the proposals will be made.

Describe how the local board will coordinate WIOA Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area.[[15]](#footnote-15)

Greater Nebraska partners with TANF, Community Action Partnerships, SNAP, SCSEP, and Job Corps 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. The Nebraska Department of Transportation launched Phase 3 of the Mobility Management Project in July 2019. This phase consists of three stages, scheduled for completion in 2022. Stage One, consisting of seven projects, including several studies, coordination, public relations, and selection of a technology vendor, is currently underway. This initiative can be found at <https://nebraskatransit.com/index.php/mobility-management/>.

Describe plans, assurances, and strategies for maximizing coordination, improving service delivery, and avoiding duplication of WIOA Title III Wagner-Peyser services and other services provided through the One-Stop delivery system.[[16]](#footnote-16)

Greater Nebraska will work to align services across programs 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 through implementation of “light case management” across all programs. This has resulted in a stronger understanding of partner programs and resources, increasing referrals, co-enrollments, and coordination of services. MOU’s have been established to define a detailed process among AJC partners.

Describe how the local board will coordinate WIOA Title I workforce investment activities with adult education and literacy activities provided under WIOA Title II. This description must include how the local board will carry out the review of local adult education service provider applications, consistent with WIOA Secs. 107(d)(11)(A) and (B)(i) and 232.[[17]](#footnote-17)

Adult Education is available through the workforce system to provide foundational education and subject matter knowledge. This includes academic and foundation skills, corrections education, GED or high school equivalency diploma, postsecondary preparation, career pathways foundations, work readiness skills, basic literacy, computer literacy, and English-as-a-Second Language instruction. The foundational knowledge imparted through workforce system’s education services form a basis that is applicable across a range of industries and occupations. The core partners work with K-12, public and private postsecondary institutions and other education and training providers to connect job seekers with education opportunities aligned to their specific needs.

Assessments are administered by WIOA core partners according to the needs of their clients in order to gauge career interests, measure basic skills, identify specific job competencies, assess English and basic education literacy (i.e., ABE, ESL/GED), evaluate specific functional skills, and determine eligibility for public assistance.

The GNWDB will carry out the review of local applications submitted under WIOA Title II by eligible service providers seeking a grant or contract for the provision of adult education and literacy activities to determine whether such applications are in alignment with the local plan.

No less than 60 days prior to the deadline for Board review, the Adult Education State Director (AE) at the Nebraska Department of Education (NDE) will provide in writing to the Administrative Entity the timeline for receipt of grant proposals at the state level and an expected forwarding date to the local board.

The Board Chair has designated the System Coordination Committee to participate with the Administrative Entity in the review of 100% of the applications. Applications will be reviewed using a rubric developed by the AE State Director. The State Director or an Adult Education representative will meet with, or provide guidance to, the review committee to provide explanation and guidance prior to the review process. Criteria may include coordination strategies, co-enrollment opportunities, projected enrollment by site, and evidence of partnerships with One-Stop partners and the One-Stop Operator.

The System Coordination Committee will produce a written evaluation for each application indicating whether the application was found to be consistent with the local plan. These evaluations will be provided to the Board Chair for final recommendations to the AE State Director. On behalf of the local Board, the Board Chair will notify the AE State Director in writing of the final recommendations no later than 15 working days after receipt of the applications. NDE will make final determination on all grants from USDOE.

The board will make recommendations to the eligible agency to promote alignment with this plan during MOU negotiations, evaluation of the local workforce delivery system, and as a part of the AJC certification process. As a core partner, AE will be charged with maximizing local and regional community resources to meet the needs of employers and job seekers.

Provide copies of executed *cooperative agreements*, as attachments to the local plan, which define how *all* local service providers will carry out requirements for integration of and access to the entire set of services available in through local One-Stop delivery system.[[18]](#footnote-18) In this context, *cooperative agreement* means a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that is, consistent with 31 USC §§ 6302-6305:[[19]](#footnote-19)

* 1. used to enter into a relationship, the principal purpose of which *is to* transfer anything of value from the Federal awarding agency or pass-through entity to the non-Federal entity to carry out a public purpose authorized by a law of the United States (refer to 31 USC § 6101(3)) and *not to* acquire property or services for the Federal government or pass-through entity's direct benefit or use; and
  2. distinguished from a grant in that it provides for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity contemplated by the Federal award.

Greater Nebraska does not have any cooperative agreements.

Identify the entity responsible for the disbursal of grant funds described in WIOA Sec. 107(d)(12)(B)(i) as determined by NDOL or the local CEO, as applicable.[[20]](#footnote-20)

The administrative entity and the fiscal agent for the Chief Elected Officials Board and Greater Nebraska Workforce Development Board is Nebraska Department of Labor. The NDOL Administrative and Finance staff oversee all budgets, performance tracking, program monitoring, and reporting, with oversight from the CEOB and GNWDB.

Describe the competitive process that will be used to award local area subgrants and contracts for WIOA Title I activities.[[21]](#footnote-21)

A competitive process, based on Nebraska Department of Administrative Services procurement policies and procedures, will be and has been used when issuing a request for purchase (RFP). The State follows the same policies and procedures it uses for its non-Federal procurements.

Nebraska’s procurement model contains six phases including procurement types, procurement planning, market research, solicitation and award, contract management and completion and closeout. There are numerous steps involved with each phase. The competitive bidding process is a fourteen-step process outlined below:

* Complete the RFP/ ITB
* Public Notice
* Pre-Bid Conference
* Question and Answer Period
* Final Preparations
* Receipt of Bids
* Bid Opening
* Bid Review
* Distribution of Bids
* Evaluation Process
* Oral Interviews/ Demonstrations
* Best and Final Offer
* Evaluation and Award
* Contract Finalization

Describe the current local levels of performance negotiated with NDOL, consistent with WIOA Sec. 116(c), to be used by the local board to measure the performance of:

a. local WIOA Title I programs; and

b. performance of the local fiscal agent, if applicable, local Title I service providers, and the local One-Stop delivery system.[[22]](#footnote-22)

The State of Nebraska negotiates state performance levels with the federal Employment and Training Administration and utilizes a statistical adjustment model as a basis for negotiations with each local area. Greater Nebraska local area performance levels are negotiated by the State and Greater Nebraska, represented by the Reemployment Services Administrator and Greater Nebraska Workforce Development Board Chair. Greater Nebraska’s performance goals are higher than State negotiated performance in several areas. Failure to meet these goals results in Technical Assistance requirements and recommendations. The Greater Nebraska Workforce Development Board will require Greater Nebraska program staff to request Technical Assistance prior to failure of any performance metric.

**Negotiated Performance Measures**

Workforce Development Activities (Title 1 of WIOA) – GNWDB

| **Adult** | **PY 2020** | **PY 2021** |
| --- | --- | --- |
| Employment Q2 after exit | 83% | 83% |
| Employment Q4 after exit | 79% | 79% |
| Median earnings Q2 after exit | $6,300.00 | $6,300.00 |
| Credential Attainment Rate | 63% | 63% |
| Measurable Skills Gains | 62% | 62% |

| **Dislocated Worker** | **PY 2020** | **PY 2021** |
| --- | --- | --- |
| Employment Q2 after exit | 89% | 89% |
| Employment Q4 after exit | 86% | 86% |
| Median earnings Q2 after exit | $8,250.00 | $8,250.00 |
| Credential Attainment Rate | 61% | 61% |
| Measurable Skills Gains | 68% | 68% |

|  |  |  |
| --- | --- | --- |
| **Youth** | **PY 2020** | **PY 2021** |
| Employment Q2 after exit | 83% | 83% |
| Employment Q4 after exit | 81% | 81% |
| Median earnings Q2 after exit | $5,290.00 | $5,290.00 |
| Credential Attainment Rate | 55.8% | 55.8% |
| Measurable Skills Gains | 56% | 56% |

Describe the actions the local board will take toward becoming or remaining a high-performing local board, consistent with factors developed by the state board.[[23]](#footnote-23)

The Nebraska Workforce Development Board has not established guidelines for becoming a high-performing local board.

Describe how training services for adults and dislocated workers outlined in WIOA Sec. 134 will be provided through the use of individual training accounts,[[24]](#footnote-24) including:

The Workforce Innovation and Opportunity Act (WIOA) mandates that all training services, except for limited exception identified in the Contracting with Training Providers Policy, be provided through the use of Individual Training Accounts (ITAs) and that eligible individuals shall receive ITAs through the one-stop delivery system.

Training services may be made available to employed and unemployed adults, dislocated workers and youth after a career planner determines, through an interview, evaluation, or assessment, and career planning, that the individual:

* Is unlikely or unable to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services (adults and dislocated workers);
* Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment (adults and dislocated workers); and
* Has the skills and qualifications to participate successfully in training services.

Training can also be provided when:

* The participant selects a program of training services that is directly linked to the employment opportunities in the local area or planning region, or in another area to which the individuals are willing to commute or relocate;
* A WIOA Adult participant is in one of the priority populations.

1. whether contracts for training services will be used;

No contracts for training are currently used in the local area. The board has established a local policy for providing training outside of ITA’s. Specific criteria has been established for contracting with training providers that are not part of the ITA process.

1. how the use of contracts for training services will be coordinated with the use of individual training accounts; and

Contracts for services may be used instead of ITAs when one or more of the following five exceptions apply and the local area has fulfilled the consumer choice requirements. Exceptions to ITA’s are intended to meet special needs and are used infrequently. The Strategic Planning Committee must review all programs before making a recommendation to the GNWDB.

| 1. | when the services provided are on-the-job training (OJT), customized training, incumbent worker training, or transitional employment; |
| --- | --- |
| 2. | when the local board determines that there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs; |
| 3. | when the local board determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment; |
| 4. | when the local board determines that it would be most appropriate to contract with an institution of higher education or other eligible provider of training services that will facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice. Providers of training services must be authorized by accrediting or governing authorities to provide training services in Nebraska or to Nebraska residents; or |
| 5. | when the local board is considering entering into a pay-for-performance contract, and the local board ensures the contract is consistent with WIOA requirements on pay-for-performance contracts (see 20 CFR § 683.510). |

1. 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.

The Greater Nebraska Workforce Development Board requires informed consumer choice in a participant’s selection of an eligible training provider. The requirements for consumer choice include:

* Availability of the Eligible Training Provider List (ETPL) to customers through the One-Stop system;
* An individual who has been determined eligible for training services may select a program from the ETPL after consultation with a career planner.
  + Consultation with a career planner will include:
    - An interview, evaluation, or assessment and career planning informed by local labor market information and training provider performance information
      * appraisal of the participant's need for training services based on an interview, evaluation, or assessment and career planning informed by local labor market information and training provider performance information or any other career service received; and
      * documenting the participant's need for training services in the participant's case file.
* Priority consideration must be given to programs that lead to recognized postsecondary credentials and are aligned with in-demand occupations in the local area.
* Unless the program has exhausted training funds for the program year, the career planner must refer the individual to the selected provider and establish an ITA for the individual to pay for training.
* The costs for training services paid through an ITA to a training provider will be funded by out-of-school youth, adult, or dislocated worker program funds, depending on the program in which the participant is enrolled or co-enrolled.
* Training services for eligible individuals are typically provided by training providers who receive payment for their services through an ITA. The ITA is a payment agreement established on behalf of a participant with a training provider. Individuals may select training programs that cost more than the maximum allowed amount for an ITA, if they have other funding sources available to supplement the ITA. Other sources may include: Pell Grants, scholarships, loans, severance pay, Temporary Assistance for Needy Families (TANF), etc. Training services must be provided in a manner that maximizes informed consumer choice.
* The local board, through the One-Stop center, may coordinate funding for ITAs with funding from other Federal, State, local, or private job training program or sources to assist the individual in obtaining training services, subject to requirements for coordination of WIOA training funds under 20 CFR § 680.230.

The One-Stop Operator is expected to ensure this availability and to oversee its usage. Reemployment Services Coordinators serve as career planners and are consultants during this process and thoroughly document the consumer choice process.

Describe how the local area One-Stop center(s) is implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by other One-Stop partners.[[25]](#footnote-25)

Greater Nebraska is working with the State to ensure processes to be implemented are compliant, as well as learning best practices from other states. It is the goal of the Greater Nebraska Workforce Development Board to develop and implement an integrated, technology-enabled intake process as part of a process improvement plan focused toward making WIOA services more accessible, efficient, and effective.

Greater Nebraska currently utilizes NEworks as a case management information system. This system is also used by State programs, including TAA and NDWG, as well as SNAP Next Step E&T. Additional partners are working with the State to determine how usage of the system may benefit their program(s).

Describe the direction given by NDOL to the local board and by the local board to the One-Stop operator will ensure that:

* 1. 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;[[26]](#footnote-26) and

Following the Priority of Service chart below, individuals will be enrolled into career and training services based on their category. Staff will case note priority of service determination at enrollment. Should capacity or funds become an issue, program resources will be focused toward participants with the highest priority levels in descending order.

* 1. Veterans receive priority of service in all USDOL-funded training services, which includes training services provided through Title I programs.[[27]](#footnote-27)

One-Stop partner staff 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 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.

Services to eligible adult participants must be provided in the following order:

|  |
| --- |
| **First, Veterans and eligible spouses of Veterans who are:** |
| A. Recipients of public assistance; |
| B. Low-income; or |
| C. Basic-skills deficient; |
| **Second, 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; |
| **Third, Veterans and eligible spouses of Veterans who are not:** |
| A. Recipients of public assistance; |
| B. Low- income; or |
| C. Basic-skills deficient |
| **Last, to persons who are not:** |
| A. Recipients of public assistance; |
| B. Low- income; or |
| C. Basic-skills deficient. |

1. Describe the process used by the local board to provide an opportunity for the public comment on the development of the local plan or any subsequent modification of the plan before submitting the plan to NDOL. To provide adequate opportunity for public comment, local boards must:
   1. make information about and copies of the plan and subsequent modifications available to the public through electronic and other means, such as public hearings and local news media;[[28]](#footnote-28)
   2. include an opportunity for comment by members of the public, including representatives of businesses, education, and labor organizations.[[29]](#footnote-29)
   3. provide no more than a 30-day period for comments on the plan and subsequent modifications before submission to NDOL, beginning on the date on which the plan and modifications are made available to the public;[[30]](#footnote-30)
   4. submit to NDOL any comments that represent disagreement with the plan or subsequent modifications[[31]](#footnote-31) *or* indicate that disagreeing public comments were not received, if that is the case; and
   5. ensure that all open meetings are held in compliance with the Nebraska Open Meetings Act.[[32]](#footnote-32)

**Public Comment Process**

A public notice was issued in the following newspapers:

**Beatrice Daily Sun**

200 North Seventh Street

Beatrice, NE 68310

(402) 223-5233

beatrice.legals@beatricedailysun.com

**Columbus Telegram**

1254 17th Avenue

Columbus, NE

(402) 564-2741

col.clerk@lee.net

**Grand Island Independent**

422 W. First

Grand Island, NE

(308) 382-1000

legals@theindependent.com

**Hastings Tribune**

908 W 2nd

Hastings, NE

(402) 462-2131

legals@hastingstribune.com

**North Platte Telegraph**

621 N Chestnut St.

North Platte, NE

(308) 535-4731

jmurrish@nptelegraph.com

**Scottsbluff Star-Herald**

1405 Broadway

Scottsbluff, NE

(308) 632-9000

casey.harvey@starherald.com

**Sidney Sun-Telegraph**

817 12th Ave

Sidney, NE 69162

(308) 254-2818

legals@suntelegraph.com

**Kearney Hub**

13 E 22nd St

Kearney, NE

(308) 233-9707

legals@kearneyhub.com

**Norfolk Daily News**

PO Box 977

Norfolk, NE 68702

(402) 371-1020

legals@norfolkdailynews.com

The Board will provide no more than a 30-day period for comment on the plan before its submission to the Governor, beginning on the date on which the proposed plan is made available.

The board will submit any comments that express disagreement with the plan to the Governor along with the plan.

Consistent with WIOA sec. 107(e), the board will make information about the plan available to the public on a regular basis through electronic means and open meetings as the plan is updated.

On March 1, 2021, the GNWDB hosted a public meeting via videoconference. The local and regional plan modification were available for comment.

Copies of the proposed plan modification will be made available to the public through the NDOL website and by request.

Regional partners and the public were invited to a public meeting on March 1, 2021 via videoconference to discuss the proposed plan allowing for the opportunity for comment by members of the public, including representatives of business, labor organizations, and education.

1. 20 CFR § 679.560(a)(6) [↑](#footnote-ref-1)
2. 20 CFR § 679.560(b)(1)(i). *Workforce development system* refers to the entirety of the workforce development system in the local area, which may include partners other than required One-Stop partners. [↑](#footnote-ref-2)
3. 20 CFR § 679.560(b)(1)(ii) [↑](#footnote-ref-3)
4. 20 CFR § 679.560(b)(5)(i) [↑](#footnote-ref-4)
5. 20 CFR § 679.560(b)(5)(ii) [↑](#footnote-ref-5)
6. 20 CFR § 679.560(b)(5)(iii) [↑](#footnote-ref-6)
7. 20 CFR § 679.560(b)(5)(iv). The term *resource contributions* refers to programmatic and service contributions, rather than contributions pursuant to funding agreements. [↑](#footnote-ref-7)
8. 20 CFR § 679.560(b)(2) [↑](#footnote-ref-8)
9. 20 CFR § 679.560(c)(i)-(v) [↑](#footnote-ref-9)
10. 20 CFR § 679.560(b)(4) [↑](#footnote-ref-10)
11. 20 CFR § 679.560(b)(6) [↑](#footnote-ref-11)
12. 20 CFR § 679.560(b)(7) [↑](#footnote-ref-12)
13. 20 CFR § 679.560(b)(8) [↑](#footnote-ref-13)
14. 20 CFR § 679.560(b)(9) [↑](#footnote-ref-14)
15. 20 CFR § 679.560(b)(10) [↑](#footnote-ref-15)
16. 20 CFR § 679.560(b)(11) [↑](#footnote-ref-16)
17. 20 CFR § 679.560(b)(12) [↑](#footnote-ref-17)
18. 20 CFR § 679.560(b)(13) [↑](#footnote-ref-18)
19. 20 CFR § 675.300 [↑](#footnote-ref-19)
20. 20 CFR § 679.560(b)(14) [↑](#footnote-ref-20)
21. 20 CFR § 679.560(b)(15) [↑](#footnote-ref-21)
22. 20 CFR § 679.560(b)(16) [↑](#footnote-ref-22)
23. 20 CFR § 679.560(b)(17) [↑](#footnote-ref-23)
24. 20 CFR § 679.560(b)(18) [↑](#footnote-ref-24)
25. 20 CFR § 679.560(b)(20) [↑](#footnote-ref-25)
26. 20 CFR § 679.560(b)(21) [↑](#footnote-ref-26)
27. 20 CFR § 680.650 [↑](#footnote-ref-27)
28. 20 CFR §§ 679.510(b)(1) and (5) [↑](#footnote-ref-28)
29. 20 CFR § 679.510(b)(2) [↑](#footnote-ref-29)
30. 20 CFR § 679.510(b)(3) [↑](#footnote-ref-30)
31. 20 CFR § 679.510(b)(4) [↑](#footnote-ref-31)
32. Neb. Rev. Stat. §§ 84-1407 through 84-1414 [↑](#footnote-ref-32)