



SENT TO PRIMARY ADDRESSEE VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

17 August, 2017

Ravalli County Commissioners  
215 S. 4<sup>th</sup> Street, Suite A  
Hamilton, MT 59840

Re: Literacy Bitterroot and WIOA Funds

Dear Ravalli County Commissioners,

I want to thank you for reaching out to me with your concerns on how to better serve our Montana students. I believe that service closest to our students is best, and I have a longstanding record of promoting local control in education. However, as County Commissioners you are surely aware that when accepting federal dollars certain strings are attached that may diminish local control. Before addressing your letter the Office of Public Instruction (OPI) received on August 9<sup>th</sup> in more direct detail, I would first like to provide you with some history on the federal Workforce Innovation and Opportunities Act (WIOA) and the process that Montana implemented to secure the grant with which your letter is concerned.

Prior to the federal WIOA, the federal Workforce Innovation Act (WIA) awarded funds to organizations per the use of a formula (**please see Attachment A**). In 2014, the newly signed federal WIOA required a change in the way states distribute this federal grant. The following Montana stakeholders determined how to allocate these funds in accordance with the new federal requirements:

- Operating under Title I of WIOA
  - The Adult Program
  - The Dislocated Worker Program
  - The Youth Program
- Operating under Title II of WIOA (Under Which the OPI Operates)
  - The Adult Education and Literacy Program
- Operating under Title III of WIOA
  - The Wagner-Peyser Act Program
- Operating under Title IV of WIOA
  - The Vocational Rehabilitation Program

These stakeholders modified the way that local programs were funded by dividing the state into current regional Montana Association of Counties (MACo) Districts. This decision had nothing to do with county governments, but was rather a convenient, already existing map which was co-opted for this purpose. This public process on the new distribution structure was a multi-year project (**please see the attached timeline, Attachment B**). Within this timeline, you will note extensive discussion with service provider directors. These included Shop Talks, conference calls, webinars, and bi-weekly e-mails. The announcement that the new regional coverage would be determined by MACo District came in August of 2016, a full six months prior to the release of the Request for Proposal (RFP).

A few months after taking office as State Superintendent, I met with Senator Connell during the legislative session. I became aware of the change in the federal program and its potential impact on Ravalli County. After this, I personally and immediately reached out to Literacy Bitterroot's Director, Dixie Stark, and others involved

with Literacy Bitterroot. Since then, I have had multiple communications within the OPI as well as with Director Stark on how to ensure that Ravalli County remains served. After learning that Literacy Bitterroot **chose not to apply** for this grant, I encouraged Director Stark to submit a letter of support to be included in the packet of submitted applications for Ravalli County's MACo District (**please see attached RFP process document and 2017 WIOA grant recipients, Attachments C and D, respectively**).

There seems to be some confusion as to the role of the OPI in this whole process. The OPI **did not** review the grant applications. The OPI **did not** select among those who applied and **did not** conclude which programs would receive funding. This work was done by **an independent review board** and the decision was then reported to the OPI. **The OPI's job is to administer and audit the use of these grant funds and to monitor the services provided.**

Additionally, graduation, including HiSET achievement, is a highly valued part of workforce development. However, this grant also targets a number of other critical student triumphs, such as English language acquisition, occupational skill training, on-the-job training, skill upgrading and retention, entrepreneurial training, critical thinking skills, and digital literacy skills. Successful future applicants for this grant will be required to demonstrate an ability to provide all of this and more to their students throughout the entire MACo District.

Now, to address your questions, in order:

1. "...[S]tep-by-step, what conditions must be satisfied for our Local Program to regain the State/Federal grant administered by OPI"
  - One of the requirements for applying for this grant is that a program must provide a plan demonstrating how it would use its funds to provide services to its entire MACo District. If Literacy Bitterroot wishes to regain access to these grant funds, it will have to figure out how to provide services in not just Ravalli County, but also in Missoula and Mineral Counties, and how to do that better than any other program in Ravalli, Missoula, or Mineral County that applies for the opportunity. This does not necessarily require the program be situated in the largest city in the District. For example, a program out of Livingston in Park County will be serving MACo District 9, which also includes Gallatin and Meagher Counties.
2. "Please state whether there is any chance the Ravalli Program can get this funding next year. If there is a chance, please provide the conditions that must be met by any and all parties."
  - There is a chance that Literacy Bitterroot could get funding. First, Missoula County's program would need to fail to satisfy part of its requirements under the grant. Missoula County's program must serve Ravalli, Mineral, and Missoula County. The OPI will be monitoring Missoula County's program, as it monitors all such programs, to ensure compliance with the grant requirements. Should that happen, a new grant application process could begin and Literacy Bitterroot, as well as any other regional programs, would be invited to apply. Literacy Bitterroot would then have to apply and the program would have to satisfy all of the requirements of the grant, including those outlined in response to Question 1.
3. "Please state the circumstances under which Missoula Public Schools will continue to enjoy the funding previously awarded to...Literacy Bitterroot."
  - As long as the Missoula County program successfully administers its grant funds to the benefit of the entire MACo District, it will continue to receive those funds for the duration of the grant term—four years.

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4. "If there is no chance for Ravalli to regain the funds this year, explain why and when the next opportunity will come."
  - There is a possibility that Literacy Bitterroot could regain funds in the following year. Please see the responses to Questions 1-4.
  
5. "We are unclear about why funding for our County's HiSET Program was awarded to Missoula. Please explain in detail, why the sudden change? Why does a city control our rural area's Program?"
  - Missoula County's Program, in their application for the grant, provided the application reviewers sufficient cause to believe that it could provide services across the entirety of the MACo District and do so better than any other applicants.

I join you in applauding the hard work of Literacy Bitterroot in aiding our Montana students in their pursuit of a bright future. As leaders of Ravalli County, please reach out to Missoula County and Missoula County Public Schools in order to foster the working relationship necessary for the mutual benefit of our students.

Enclosed along with the above-mentioned timeline for the decision-making process, please also find a list of the new providers for each MACo District and a copy of the March 2017 RFP. Please let me know if I can provide any additional information for the Commission. As always, I and my staff remain available to answer questions or concerns. It is my honor to serve this state and our students.

Best regards,

Superintendent Elsie Arntzen  
Montana Office of Public Instruction

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| <p>CC: Senator Fred Thomas<br/>Representative Theresa Manzella<br/>Representative Nancy Balance<br/>Missoula County Commissioners<br/>The Ravalli Republic</p> | <p>Senator Pat Connell<br/>Representative Ron Ehli<br/>Representative Ed Greef<br/>Monique Fortmann, MCPS Adult Ed. Div.</p> |
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- Encl: Attachment A – List of Service Providers under WIA  
Attachment B – OPI Timeline of the Transition from the Workforce Investment Act to the Workforce Innovation and Opportunity Act  
Attachment C – Copy of the March 2017 Request for Proposal  
Attachment D – 2017 List of Grant Recipients by MACo District