

Glenda Wiles

From: OPI State Superintendent <opisupt@mt.gov>
Sent: Thursday, August 17, 2017 5:10 PM
To: Ravalli County Commissioners Office
Cc: Thomas, Fred; nancyballance@aol.com; michelle.mcconnaha@ravallirepublic.com; Manzella, Theresa; edgreef@hotmail.com; Ehli, Ron; Connell, Pat
Subject: OPI Response to Ravalli Commissioners
Attachments: Attachment A.pdf; Attachment B.pdf; Attachment C.pdf; Attachment D.pdf; Response Letter to Ravalli County Commission 08-17-17.pdf

Dear Ravalli County Commissioners,

Please see the attached response letter and documents to your inquiry dated August 3, 2017, which the OPI received on August 9, 2017. This is in regard to the grant process of the new Federal Workforce Innovation and Opportunities Act (WIOA). The Office of Public Instruction is here to best serve you and your students. We look forward to further communication.

Best regards,
Elsie Arntzen
State Superintendent

Attachment C
RF Proposals for
Workforce Innovation
& Opportunity Act
Title II
not printed off
it was 12 pages
G.W.



SENT TO PRIMARY ADDRESSEE VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

17 August, 2017

Ravalli County Commissioners
215 S. 4th 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 9th 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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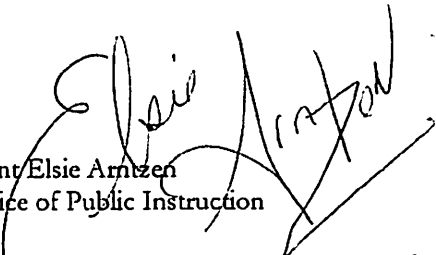
4. "If there is no chance for Ravalli to regain the funds this year, explain why and when the next opportunity will come."
 - There is a possibility that Literacy Bitterroot could regain funds in the following year. Please see the responses to Questions 1-4.

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
Representative Theresa Manzella
Representative Nancy Balance
Missoula County Commissioners
The Ravalli Republic</p> | <p>Senator Pat Connell
Representative Ron Ehl
Representative Ed Greef
Monique Fortmann, MCPS Adult Ed. Div.</p> |
|--|---|

- 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

Attachment A

2016-2017 WIA Grant Recipients

Below are the 2016-2017 allocations. These WIA providers have submitted successful applications back to 1996.

Deer Lodge, Anaconda, Bozeman, Forsyth, Hamilton, and Hardin did not submit a 2017 WIOA RFP.

Provider	STATE Current Year	Federal current Year	Total Current Year	Prior Year Allocation
Notes:				
Anaconda	\$ 8,797	\$ 19,603	\$ 28,400	\$ 28,935
Billings	\$ 111,246	\$ 179,053	\$ 290,299	\$ 300,045
Bitterroot - LVA	\$ 23,684	\$ 41,948	\$ 65,632	\$ 61,050
Bozeman	\$ 45,322	\$ 79,983	\$ 125,305	\$ 141,302
Butte	\$ 17,733	\$ 31,562	\$ 49,295	\$ 54,872
Deer Lodge	\$ 9,049	\$ 20,399	\$ 29,448	\$ 32,691
Forsyth	\$ 5,579	\$ 13,943	\$ 19,522	\$ 18,381
FVCC	\$ 45,341	\$ 80,186	\$ 125,527	\$ 141,062
Glendive Dawson	\$ 9,391	\$ 20,444	\$ 29,835	\$ 32,763
Hardin	\$ 11,472	\$ 24,251	\$ 35,723	\$ 30,249
Havre	\$ 5,004	\$ 12,723	\$ 17,727	\$ 19,433
Helena	\$ 26,880	\$ 47,598	\$ 74,478	\$ 72,242
Lewistown	\$ 18,641	\$ 37,476	\$ 56,117	\$ 56,686
Livingston	\$ 12,769	\$ 26,594	\$ 39,363	\$ 33,013
MCC	\$ 16,850	\$ 30,054	\$ 46,904	\$ 48,125
Missoula	\$ 79,416	\$ 140,460	\$ 219,876	\$ 200,208
Skyline (GFCOT)	\$ 77,824	\$ 137,319	\$ 215,143	\$ 187,834
MSP	\$ -	\$ 46,611	\$ 46,611	\$ 46,611
State Totals	\$ 524,998	\$ 990,207	\$ 1,515,205	\$ 1,505,502

WIA to WIOA – Timeline of Events for Transition

2014

- **July 22, 2014**
 - Email sent to all directors apprising new law was passed and stated will send ongoing updates and link to *Ready to Work: Job-Driven Training and American Opportunity* which was the framework for the new law
- **July 23, 2014**
 - Email sent to all directors with links to the new law
- **July 31, 2014**
 - Email sent to all directors announcing upcoming Shop Talk on August 5
 - Attached information on regional approach and shared the Job Driven focus of the new law
- **August 5, 2014**
 - Shop Talk for field apprising of the new law – opening statement below
 - *The state will use leadership dollars to position all current ABE providers to be viable applicants in 2016; focus pathways/ partnerships. There will be no grandfathering; all programs will need to compete. To be consistent with the new law, we need to think differently; ABE is being transformed.*
- **August 7-October 29, 2014**
 - Bi-weekly emails were sent to all directors and posted for teachers regarding the new law with videos and the ability to blog with the Department of Education
 - Below is text from the initial email announcing the links and blog site:
 - *Per our conference call on Tuesday, I will be sending information on the new law to you in chunks as I receive it. Norene will also post the information on LINC'S following my message to you. OCTAE hosted a call for state directors today, and below are the three significant pieces of information for you. The video is a great introduction to the new law; very good for sharing at meetings. You can post comments on the blog (keeping in mind it is public). Lastly, there are the links for more information. We were reminded that interpretation and regulation lies ahead, and we should avoid assumptions.*
- **August 13, 2014**
 - Email sent to all directors with link to WIOA vision Program Memorandum OCTAE 15-3 from DOL, Voc Rehab, OCTAE
- **September 22-23, 2014**
 - Fall Conference for directors and staff; one half-day spent on WIOA in depth with Power Point on significant changes
- **October-November 2014**
 - 4 Regional Trainings for directors and lead teachers
 - Directly tied upcoming career pathway initiative with WIOA requirements
 - Hands-on activities and homework was assigned to help programs implement career pathways
- **November 4, 2014**
 - Shop Talk – Brief WIOA Update
- **November 17, 2014**
 - Regional Pathways Conference Call;

Attachment B

- **December 16, 2014**
 - Shop Talk – Brief WIOA Update

2015

- **January 20, 2015**
 - Shop Talk included WIOA updates on regulations, transition dates, and unified planning
- **January 20, 2015**
 - Email sent to all directors after the Shop Talk with link to comment on new educational functioning level descriptors for WIOA
- **February 2015**
 - 4 Regional Trainings
 - Focus on career pathways and strengthening the one-stop partnership required in WIOA
- **February 19, 2015**
 - Email sent to all directors apprising them that a WIOA discussion group was set up for state directors and teachers to join a private group on their progress of implementing program delivery changes to meet the requirements of the new law
- **February 19, 2015**
 - Email sent to all directors with link to guidance on Vision for Workforce System and Implementation of WIOA
- **February 22, 2015**
 - Email sent to all state directors for comment period forwarded to directors on WIOA Combined Plan Requirements
- **March 10, 2015**
 - Email sent to all directors on WIOA Operating Guidance 25-14
- **March 16, 2015**
 - Shop Talk – WIOA Transition Plan submittal and data reporting for WIOA were main topics
- **April 6, 2015**
 - Email sent to all directors with proposed regulations for Title I and II and apprised directors that comments were being accepted
- **April 21, 2015**
 - Shop Talk main topics included WIOA partnership building, rebranding and instructional planning
- **April 27-28, 2015**
 - WIOA/Pathway Meeting for directors and lead teachers
 - Focus of the meeting was on big changes under WIOA
 - Handouts included WIOA Program Readiness Self-Assessment, Program Readiness Tool, and WIOA Questions and Challenges
 - Programs were given WIOA Timeline PowerPoint including dates for comment period
 - Homework materials included instructional materials review and recruitment materials template

Attachment B

- **May 2, 2015**
 - Email sent to all directors with save the date meeting information for upcoming WIOA Core Partner Summer Meeting
- **May 6, 2015**
 - Email sent to all directors with Integrated Education and Training Requirements for WIOA
- **May 27, 2015**
 - Shop Talk – Encouraged all directors to send WIOA comments to me for a collaborative posting and provided Core Partner updates
- **May 28, 2015**
 - Email sent to all directors with summer meeting information with emphasis on performance and partnering under the new law
- **June 4, 2015**
 - Email sent to all directors requesting WIOA comments for Title II to be sent directly to state director to forward to the state directors professional organization for feedback to the Feds sent as one collective group
- **June 24, 2015**
 - Email sent to all directors with WIOA Core Partner Meeting updates
- **July 2, 2015**
 - Email sent to all directors to read the Joint WIOA Blog for all Core Partners and encouraging them to participate
- **August 6, 2015**
 - Email sent to all directors with final agenda for WIOA Core Partner Summer Meeting
- **August 18-19, 2015**
 - Core Partner Summer Meeting
 - Focused on regional approach to WIOA implementation; all program directors brought staff to work with partners on the following: leadership and change, WIOA Performance Reporting, connecting clients and partners, career pathways, sector strategies
- **September 29-30, 2015**
 - Fall Conference: WIOA Transition was a major topic
- **October 2015**
 - Email sent to all directors to gather information on how they served youth, employers, and students with barriers to incorporated into the WIOA State Plan
- **October 8, 2015**
 - Email sent to all directors thanking them for responses to request for information
- **October 20, 2015**
 - Shop Talk – WIOA update
 - Purposed WIOA statewide joint performance report was distributed
 - Comment date for WIOA State Plan was discussed
- **November 17, 2015**
 - Shop Talk – WIOA updates covered proposed regions, performance templates, and due dates for RFP

Attachment B

2016

- **January 13, 2016**
 - Shop Talk agenda covered WIOA updates and RFP target dates and info updates; Program Memorandum OCTAE/DAEL 15-7 with WIOA FAQ
- **January 20, 2016**
 - Email sent to all directors with link to SWIB website for posting public comments on the MT WIOA Combined State Plan
- **February 3, 2016**
 - WIOA Webinar for existing providers with comprehensive information regarding what a WIOA provider must be able to provide to clients and information on the Combined State Plan that was posted in January
- **March 9, 2016**
 - Shop Talk agenda covered upcoming WIOA topics to be presented at April meeting
- **March 17, 2016**
 - Email sent to all directors with invitation to Disability Conference for WIOA accountability
- **March 22, 2016**
 - Transition Application sent to all existing providers
- **April 2016**
 - State Plan submitted by Core Partners to the Feds (30 day public comment period)
- **April 6-7, 2016**
 - Spring Directors Meeting with half day agenda on WIOA including an activity where participants had to work in groups to discuss how to deliver services in a new and different way to accommodate fluctuating regional needs
- **April 25, 2016**
 - WIOA Webinar for all program directors;
- **April 29, 2016**
 - Email sent to all directors with WIOA Transition Extension Application
- **May 10, 2016**
 - Webinar for all directors on how to complete the transition application (went through every page of the application with the participants);
- **May 12, 2016**
 - Email sent to all directors with link to post comments for WIOA Performance Reporting Information
- **June 2016**
 - State Plan returned for revisions; geographical designations must be defined
- **June 7, 2016**
 - Email sent to all directors with the link to the WIOA Transition Extension Application for 2016-2017
- **June 13, 2016**
 - Email sent to all directors with update on pre-post testing for WIOA partners

Attachment B

- **June 30, 2016**
 - Email sent to all directors with link to WIOA Final Regulations
- **July 5, 2016**
 - Email sent to all directors with WIOA Joint Report Template
- **July 6, 2016**
 - Email sent to all directors with the new educational functioning level descriptors for WIOA classroom instruction (direct comparison to new level knowledge required for student instruction under WIOA)
- **July 18, 2016**
 - Email sent to 5 program directors who had not registered for the Core Partner Meeting in August;
- **July 26, 2016**
 - Email sent to all directors apprising them that the pre-conference meeting in August will focus on new reporting tables for WIOA and other substantive changes
 - Email sent to all directors with link to “Five Things Directors Need to Know About WIOA Disability
- **August 2016**
 - State Plan resubmitted by Core Partners to the Feds with MACO Districts included and defined (30 day public comment period)
- **August 10, 2016**
 - Email sent to all directors reminding them of WIOA Core Partner Meeting and apprising them that the work will be with MACO District Core Partners
- **August 23, 2016**
 - Pre-Conference Meeting for Adult Education directors and teachers
 - Agenda covered State Plan revisions including that the distribution of funds to MACO with the new RFP date announced as April 2017
- **August 23-25, 2016**
 - WIOA Core Partner Meeting for MACO District Strategic Planning
- **September 13, 2016**
 - Email sent to all directors with link to employability skills curriculum that could be a support of teachers implementing WIOA considerations
- **October 5-6, 2016**
 - Western Regional Meeting
 - Focus on Reporting Tables for WIOA and detailed Power Point components that will be in the RFP and all components discussed were cross-walked with appropriate sections of the law
- **October 12-13, 2016**
 - Eastern Regional Meeting
 - Focus on Reporting Tables for WIOA and detailed Power Point components that will be in the RFP and all components discussed were cross-walked with appropriate sections of the law

Attachment B

- **October 10, 2016**
 - Email sent to all directors with updates on WIOA performance measures
 - Email sent to all directors with link to Integrated Education Data for WIOA
- **October 18, 2016**
 - Email sent to all directors with Power Points to assist in preparing for grant completion for WIOA
 - Four Power Points included: Corrections and WIOA, Unpacking the Regulations I, Unpacking the Regulations Subpart G, How Does a State Make an Award to Eligible Providers
- **October 19, 2016**
 - Email sent to all directors with link to credential information for WIOA
 - Email sent to all directors with link to Program Memorandum 17-1 on eligible agency completion and awards
- **October 20, 2016**
 - Email sent to all directors with link to the posted State Plan apprising them that revisions had been approved and that there were significant changes
 - Email sent to all directors with Measurable Skill Gain Targets for WIOA
- **December 13, 2016**
 - Shop Talk agenda included State Plan and RFP alignment with a reminder that MACO District meetings should continue to be sent to DOL;
- **December 19, 2016**
 - Email sent to all directors with link to published approved State Plan
- **December 20, 2016**
 - Email sent to all directors with link to Performance Accountability Guidance for WIOA Core Programs Program Memorandum OCTAE 17-2
 - Email sent to all directors with link to WIOA Employment and Training planning TEN 21-16
 - Email sent to all directors with link to Q & A for Regional and Local Planning

2017

- **January, 2017**
 - Connecting Core Partner Monthly Newsletter was launched with each MACO District contributing articles on MACO activities in their District; also includes Core Partner updates
- **January 4, 2017**
 - Email sent to all directors with link to FAQ on upcoming infrastructure costs
- **January 5, 2017**
 - Email sent to all directors asking for any WIOA grant completion questions to be submitted to state director by January 9th, as the questions would be the topics for the January 10th Shop Talk
- **January 10, 2017**
 - Shop Talk cancelled as no WIOA questions were submitted as requested

Attachment B

- **February, 2017**
 - Second edition of Core Partner Newsletter was sent to all MACO partners; ABE RFP date was in Adult Education section of this newsletter
- **February 15, 2017**
 - Shop Talk – major topic was announcing the release of RFP in March;
- **March 7, 2017**
 - Legal notice for RFP released
- **March 14, 2017**
 - RFP released
- **March 14-April 10, 2017**
 - Questions regarding the Adult Education RFP process were submitted to state director and posted publically with answers on the OPI website for all interested applicants

Attachment D

2017 WIOA Grant Recipients by MACo District

MACo Districts 1 & 2:	Dawson Community College
MACo District 3:	Miles Community College
MACo District 4:	Havre HRDC
MACo District 5:	Great Falls Adult Education – Great Falls Public Schools
MACo District 6:	Currently Vacant
MACo District 7:	Billings Adult Education – Billings School District
MACo District 8:	Helena Adult Learning Center – Helena School District
MACo District 9:	Community Health Partners – Livingston
MACo District 10:	Flathead Valley Community College
MACo District 11:	Missoula Adult Education – Missoula County Public Schools
MACo District 12:	Butte Adult Education – Butte School District
Corrections Education:	Montana State Prison

Final funding amounts for the above grantees are still being finalized as of the time of this document's creation, 8/17/2017

MACo District Breakdowns with Approximate Populations

District 1: 28,653

- Phillips: 4,192
- Valley: 7,640
- Daniels: 1,793
- Sheridan: 3,696
- Roosevelt: 11,332

District 2: 26,366

- Garfield: 1,309
- McCone: 1,694
- Richland: 11,576
- Dawson: 9,518
- Prairie: 1,148
- Wibaux: 1,121

District 3: 28,170

- Treasure: 692
- Rosebud: 9,326
- Custer: 12,092
- Powder River: 1,783
- Fallon: 3,108

District 4: 31,468

- Blaine: 6,619
- Chouteau: 5,894
- Hill: 16,596
- Liberty: 2,359

District 5: 113,473

- Cascade: 82,344
- Glacier: 13,696
- Pondera: 6,219
- Teton: 6,064
- Toole: 5,150

District 6: 21,461

- Fergus: 11,442
- Golden Valley: 852
- Judith: 1,991
- Musselshell: 4,589
- Petroleum: 485
- Wheatland: 2,102

District 7: 192,270

- Big Horn: 13,282
- Carbon: 10,399
- Stillwater: 9,290
- Sweetgrass: 3,665
- Yellowstone: 155,634

District 8: 83,081

- Broadwater: 5,667
- Lewis and Clark:
65,856
- Jefferson: 11,558

District 9: 115,041

- Gallatin: 97,308
- Meagher: 1,853
- Park: 15,880

District 10: 154,512

- Flathead: 94,924
- Lake: 29,099
- Lincoln: 19,125
- Sanders: 11,364

District 11: 157,971

- Mineral: 4,257
- Missoula: 112,684
- Ravalli: 41,030

District 12: 71,113

- Beaverhead: 9,345
- Deer Lodge: 9,150
- Granite: 3,209
- Madison: 7,820
- Powell: 6,909
- Silverbow: 34,680