

# **Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements**

## **VI. Program-Specific Requirements for Core State Plan Programs**

### **VOCATIONAL REHABILITATION**

**Program Year 2019**

**(a) Input of the State Rehabilitation Council.**

**(1) Input provided by the State Rehabilitation Council.**

The State Rehabilitation Council (SRC) and DVR continue to enjoy a collaborative working relationship. SRC members are invited to participate on various DVR planning and implementation committees. The DVR Director provides quarterly written and oral updates on programs, activities, and outcomes. In addition, DVR Program Managers, Regional Managers and field staff frequently make presentations to the full SRC and gather feedback and suggestions to improve services. The following is a summary of the SRC's activities taken directly from the 2017 SRC annual report. For more information on the VT SRC and a copy of this report go to [www.VTSRC.org](http://www.VTSRC.org)

SRC Steering Committee Report by Adam Leonard, SRC Chair

The Vermont State Rehabilitation Council (SRC) Steering Committee is charged with the task of considering and deciding upon necessary SRC business between meetings of the full Council. The Committee set agendas for the full Council meetings taking into consideration topics most pertinent and timely to the operation of the SRC. The Steering Committee achieved its goal and guided the VT SRC to a very productive year.

The largest issue that the affected VT DVR was the significant reduction in re-allotment funding DVR received. DVR's re-allotment funding was reduced 76% year over year leading to a multi-million-dollar budget shortfall in the 2016-2017 fiscal year. The Steering Committee was intimately involved in advocacy work around this issue, working with VT state legislators to propose long term financial solutions, as well as working closely with VT VR to understand the operational impact of this unexpected funding loss.

Another major focus area for the SRC this year was to better understand the services VT DVR was providing to youth. This interest was sparked by the strong emphasis on youth services in WIOA. To that end the Steering Committee scheduled a youth themed SRC meeting in June with a panel of youth who had previously or were currently receiving services from DVR as well as a panel of staff members from DVR, VABIR and the schools who all work with youth. The panels were very successful and well received by the SRC.

Additionally, many changes were made this year that were organizationally impactful to the SRC. First a decision was made to dissolve the Advocacy Outreach and Education Committee. The Steering Committee felt the work of the AOE Committee could be done on an as needed basis by specially selected SRC members as part of a subcommittee. Although this change was implemented there continues to be discussion by the SRC on whether the AOE Committee should be reinstated. Secondly, the decision was made to combine the October SRC meeting and the SRC Annual Retreat into one single event. The committee felt asking SRC members to commit to two meetings in one month was potentially burdensome. The committee planned this year's retreat to also include agenda items that would typically be covered in the full SRC meeting to combine the two events. Finally, it was proposed that to expand the size of the Steering Committee that Sam Liss and Adam Leonard should step down

from their roles as chairs of the Policy and Procedures and Performance Review Committees respectively. As Chair and Vice Chair of the SRC as well as committee chairs they were filling multiple seats on the Steering Committee, thereby reducing the total number of members on the Steering Committee. These transitions occurred starting in June and Julia Burakian and Sherrie Brunelle stepped into the roles of Performance Review Chair and Policy and Procedures Chair respectively.

#### SRC Performance Review Committee Report by Adam Leonard, P&P Committee Chair

The SRC Performance Review (PR) Committee is responsible for reviewing, analyzing and advising DVR on its performance in fulfilling its mission and responsibilities. This year the PR Committee focused much of its efforts on understanding VR's performance in relation to the new standards set forth in WIOA. This included examining the technical guidance received from RSA and its implications for VT VR.

In February 2017 the PR committee heard from Alice Porter regarding the RSA Technical Assistance Circular (TAC) which provided clarification on how RSA would be calculating the Common Performance Measures. The committee learned that VT DVR submitted written comments to RSA and many of their suggestions and concerns were addressed in the TAC. VR was asked about goals for 2016-2017 now that guidance on measuring the indicators was in place. The committee learned that because this is a new way for DVR to measure outcomes that 2016-2017 will be a baseline year, and goals will be set for future years based on this year's results.

Additionally, the committee examined the RSA guidance around what expenses can be considered Pre-employment Transition Services (Pre-ETS) expenses. We learned that the tracking required by RSA will be more cumbersome than hoped and requires counselors to delineate many of their duties between Pre-ETS and non-Pre-ETS work. However, we were glad to hear RSA and shared with VT DVR that the way in which they were tracking expenses was being done correctly.

In alignment with our focus on WIOA and Pre-ETS impact the PR Committee asked for an overview of the youth survey and listening sessions conducted by the Vermont Family Network (VFN) for DVR. Martha Frank from VFN shared these results with us. One of the major takeaways from this valuable gathering of information was that VT VR still has a large opportunity to increase awareness about VR and the services VR offers to youth with disabilities and their families.

The PR Committee also had the opportunity to see the results of one of its initiatives from last year, the Consumer Orientation. Samantha Brennan presented the new Consumer Orientation. The new program was designed in part because of the PR Committee's examination of the previous program from last year. The committee was excited to hear about the coming changes to the program.

#### SRC Policy & Procedures Committee Report by Sam Liss, P&P Committee Chair

FFY 2017 was another productive year for the SRC Policy and Procedures Committee. Four meetings were held between October and September 2017. One meeting was canceled.

The focus of the committee's work this year was reviewing, revising, and approving changes in the manual chapters needed to comply with the Federal *Workforce Innovation and Opportunity Act (WIOA)* regulations that guide the work of the Division of Vocational Rehabilitation Services (DVR). The Committee also reviewed and revised other chapters upon recommendation of the SRC Client Assistance Program (CAP) representative and other P&P Committee members.

In total, the Committee reviewed, revised and approved six (6) chapters for public comment. These chapters became final on July 1, 2017. Key changes included:

- Emphasizing “competitive, integrated employment” for all consumers;
- Including “advancement in employment” as an appropriate employment outcome;
- Clarifying the requirement to develop and complete an Individual Plan for Employment (IPE) for an eligible consumer within 90-days; and
- Defining clear procedures and timelines in the appeals process.

The Committee began work on additional chapters. The first is a new chapter that will provide guidance to VR staff on the provision of Pre-Employment Transition Services (Pre-ETS) for youth, a new requirement under WIOA. The new chapter was published in December 2017. The second is the revision of the chapter providing guidance on VR funding of hearing aids. Work on this chapter will continue into FFY 2018.

The committee agreed to review Chapter 310 related to supported employment to clarify the substance of the chapter. The committee also agreed to develop two (2) new chapters on Cost-Sharing and Denial of Benefits. The committee decided not to develop a Progressive Employment chapter.

In addition to work on the Policy and Procedures Manual, the Committee discussed two possible changes to the SRC bylaws. One is related to the advocacy function of the SRC. It was deferred for further discussion and consideration. The other, proposed adding “a parent or another immediate family member of a person with a disability” to the requisite criterion for the position of Chair or Vice-Chair of the SRC. This proposed change conforms to parallel provisions in bylaws of similar councils/committees. This proposed change was approved by the committee and voted on by the full SRC at the October 2017 meeting.

## **(2) The designated State unit’s response to the Council’s input and recommendations.**

DVR has a strong collaborative relationship with the SRC. DVR and the SRC worked very closely together to develop the State Plan and in particular, the goals and priorities.

The SRC recommends that:

- The DVR bi-annual satisfaction survey include students who are receiving Pre-ETS services. (Goal 5)
- DVR’s plan to mitigate the loss of re-allotment funds include specific targets and measures. (Goal 8)
- DVR’s plan to establish supported employment services for unserved populations include specific targets for consumers served. (Goal 10)

## **(3) The designated State unit’s explanations for rejecting any of the Council’s input or recommendations.**

Not Applicable

## **(b) Request for Waiver of State Wideness.**

**(1) A local public agency will provide the non-Federal share of costs associated with the services to be provided.**

Vermont DVR is not requesting a waiver of state wideness.

**(2) The designated State unit will approve each proposed service before it is out into effect.**

Not applicable

**(3) All state plan requirements will apply.**

Requirements of the VR portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable

**(c) Cooperative Agreements with Agencies Not Carrying Out Activities under the Statewide Workforce Development System.**

**(1) Federal, State, and local agencies and programs.**

Vermont DVR participated in a joint grant application with the Department of Children and Families, the Department of Labor, and Community College of Vermont to serve SNAP Beneficiaries. It is a SNAP Employment and Training grant designed to target beneficiaries who are recent offenders, individuals with substance abuse disorders and/or are homeless. The design has implemented clinical assessments to determine which beneficiaries are potentially eligible for DVR services. The design models the coordinated approach to services envisioned under WIOA. The project began enrolling individuals in FFY 17. As of December 2017 over 2,700 individuals have been enrolled.

Vermont DVR has a partnership with its Employee Assistance Program (EAP); the Vermont Association of Business, Industry and Rehabilitation (VABIR); and the State of Vermont Office of Child Support (OCS), to serve non-custodial parents with disabilities. The program, called Work4Kids, is offered statewide with designated VR Counselors in each region. VR Counselors provide a range of services to help Work4Kids participants obtain and sustain employment, so they can consistently meet their child support obligations. These services include vocational and other assessments, creating an individualized plan to address potential barriers to employment, counseling and guidance, and referral to other service providers when appropriate. In addition, each VR Counselor works with an Employment Consultant (VABIR), who provides assistance in work search, job placement and post-employment services. For individuals presenting multiple barriers to employment, an individualized service model is utilized. The approach focuses on progressive steps to employment including company tours, informational interviews, work experiences, community service placements, work assessments, and job shadowing. Many non-custodial parents with disabilities have never been helped in any way by the State. Reaching out to and assisting this population has produced positive outcomes. DVR has assisted many Work4Kids participants in securing employment. To date, non-custodial parents referred to the

Work4Kids program are paying approximately five times the amount of child support compared with those not referred to the program.

DVR also serves offenders with disabilities to achieve employment. Employment is a critical component to prevent recidivism and to assist offenders released from prison in successful reintegration into their communities. DVR has designated VR Counselors in each district office to serve as a single point of contact for the Department of Corrections. Currently there is one Offender Reentry Employment Specialist based in Burlington who is dedicated to employment assistance to offenders with disabilities. Jointly funded by VR and the Department of Corrections, this specialist runs employment groups and does one-on-one job placement for individuals exiting jail or who are on probation.

**(2) State programs carried out under section 4 of the Assistive Technology Act of 1988.**

The State Assistive Technology (AT) program is housed within the Division of Vocational Rehabilitation as part of the Department of Disabilities Aging and Independent Living (DAIL). The AT staff are housed in DVR and receive operational and business office support through DAIL. DVR provides funding for AT services for eligible consumers that are not covered under the Tech Act.

**(3) Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture.**

None

**(4) Non-educational agencies serving out-of-school youth.**

DVR has a long-standing agreement with the Department of Mental Health, Children's Unit, Department of Corrections, and Department for Children and Families to fund the JOBS program serving youth with emotional/behavioral disabilities. The JOBS program is a supported employment program serving youth with emotional behavioral disabilities ages 14 to 22. The partnering departments provide the state general fund match for the Medicaid Global Commitment to fund the ongoing support services. The JOBS programs are housed within the Designated Community Mental Health Agencies within the twelve Agency of Human Services Districts.

**(5) State use contracting programs.**

None

**(d) Coordination with Education Officials.**

**(1) The designated State unit's plans, policies and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of DVR services, including pre-employment transition services.**

In DVR Central Office, there is a Transition Program Director who supports all transition activities statewide. The DVR Transition Program Director and DVR Director routinely meet with Vermont

Agency of Education staff to coordinate services, and include Department of Labor, Developmental Disabilities Service Division, and Division for the Blind and Visually Impaired staff in these meetings.

Vermont DVR has a long-standing commitment to serve students in transition. With the passage of the Workforce Innovation and Opportunity Act (WIOA) in July 2014, DVR built on their existing infrastructure for transition aged youth, to implement Pre-Employment Transition Services (Pre-ETS). DVR currently has fourteen Transition Counselors that serve exclusively in-school students and focus on Pre-Employment Transition Services activities as required in WIOA. The Transition Counselors are operating out of all twelve DVR district offices and cover all Vermont high school districts. Counselors serve as a community resource to the schools, facilitating interagency partnerships through routine Core Transition Team meetings in each of the twelve DVR districts. The goals of these teams are to share resources, partner to support youth, and act as catalysts for change to improve the transition process for youth with disabilities. The Transition Counselors also coordinate with Adult Counselors each spring to facilitate moving VR consumers to adult caseloads to ensure that students graduating and moving on to either post-secondary education or careers have consistent, seamless support during this important transition.

To provide Pre-ETS, DVR determined we needed specialized employment placement services designed to meet the needs of students. Therefore, DVR created the Youth Employment Specialist model, and contracted with the Vermont Association of Business, Industry, and Rehabilitation (VABIR) for youth employment services in Vermont. VABIR provides Youth Employment Specialists (YES) to work one on one with Transition Counselors to support Pre-employment Transition Services (Pre-ETS) in all areas of the state. The YES and the Transition Counselor work as a team with each high school, and these teams meet regularly with the Transition Program Director to provide training and share best practices.

The Jump on Board for Success (JOBS) program provides supported employment services for youth with severe emotional and behavioral disabilities. The JOBS programs are operated through local community mental health agencies. JOBS staff and the Transition Counselors coordinate outreach and services with the local high schools for students who are at risk of dropping out of school and six months prior to graduation. The Developmental Services program also works collaboratively with the Transition Counselors to ensure that students who may be both eligible and meet funding priorities for developmental services are referred through the schools to the local Designated Agencies.

The Benefits Counseling team collaborates with the Transition Counselors to ensure that students and their families have access to accurate and appropriate benefits information that will allow them to make informed decisions around employment and education choices.

The Linking Learning to Careers (LLC) Work-Based Learning grant funded through the Rehabilitation Services Administration is a five year research study to improve career and college readiness outcomes for Vermont high school students with disabilities. This initiative will provide qualitative and quantitative evidence regarding the impact of LLC services on students' early career outcomes, including paid competitive employment, post-secondary school enrollment, and improved confidence to achieve career goals. The partnership between Community College of Vermont, Agency of Education, Vermont Association of Business, Industry, and Rehabilitation, high schools and career and technical educational centers throughout the state, and DVR, is integral to effective delivery of the services provided within the model. A Linking Learning to Careers Director and Assistant Director support six FTE Career Consultants and two FTE Assistive Technology Specialists, who provide these

individualized services to students in the treatment group. As of January 2018, the program has enrolled over 200 VT high school students.

**(2) Information on the formal interagency agreement with the State educational agency with respect to:**

**(A) Consultations and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post school activities, including VR services:**

The DVR Director and DVR Transition Unit meet quarterly with the Special Education Director of the Vermont Agency of Education and AOE Transition staff, to coordinate the annual Transition Conference, to discuss support and collaboration regarding improvement for Indicators 13 and 14, and to stay coordinated on other transition issues. AOE Transition staff provide ongoing technical assistance to the DVR Transition Counselors, and the DVR Transition Counselors coordinate information and education with schools in their local service areas, including AOE staff attending the monthly DVR Transition Counselor meeting at least once a year. AOE and DVR are currently in the process of drafting a new Interagency Agreement as required under WIOA

**(B) Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs.**

All DVR Transition Counselors use the *Guide to Secondary Transition services: Helping Students with Disabilities Move From School to Work*, with special educators in each of the high schools they serve. They also use the *Transition Counselor Role and Responsibilities* for guidance. They facilitate a “meet and greet” in the fall with special educators to identify specific needs, issues and obstacles in their schools, and create a plan to address them. Local Core Transition Team meetings are being reinstated around the state to support the work of Pre-ETS in WIOA.

**(C) Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services.**

Financial responsibilities are laid out in the draft MOU with AOE as follows:

*DVR/DBVI Responsibilities*

To the extent funds are available, DVR/DBVI is responsible for paying for Pre-Employment Transition Services for potentially eligible students. In addition, to the extent funds are available, DVR/DBVI is responsible for paying for vocational rehabilitation and school-to-work transition services for students and youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE).

*AOE and LEA Responsibilities*

AOE and LEAs are responsible for paying for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

*Criteria to Determine Which Agency is Responsible to Pay for Similar Services Both Can Provide under Their Respective Laws*



The following criteria shall be used, when determining which entity should pay for a similar service that both entities can provide under their respective laws:

#### The Purpose of the Service

Is the purpose of the service primarily related to an educational outcome or an employment outcome?

#### Customary Services

Is the service one that the school customarily provides under IDEA Part B? For example, if a school ordinarily provides work-based learning experiences for students with disabilities, the fact those services are now authorized under the Rehabilitation Act as Pre-Employment Transition Services does not mean the school should cease providing those services and refer those students to DVR or DBVI.

#### Eligibility

Is the student with a disability eligible for transition services under IDEA? Because the definition of “student with a disability” for the DVR and DBVI programs includes an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is broader than the definition under IDEA. DVR and DBVI are authorized to provide transition services for students with disabilities who meet the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act.

Nothing in this agreement is to be construed as reducing the responsibility of the local education agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

### **(D) Procedures for outreach to and identification of students with disabilities who need transition services.**

As noted, DVR has now established a cadre of 14 in school Transition Counselors who serve all sixty public high schools in the state. We expect their presence in the schools working with students as young as aged 14, will greatly improve the early identification of students who need transition services. Also as noted, DVR has established a cadre of Young Adult Counselors to facilitate transition of students from PETS to the adult DVR program. The DVR Transition Unit also coordinates with the Division of Developmental Services (DDS) to identify students who are likely to need transitional support into the adult developmental disabilities program.

### **(e) Cooperative Agreements with Private Nonprofit Organizations.**

DVR maintains Social Security Administration, Ticket to Work cooperative agreements with most of the private non-profit employment service providers in the state. Agreements exist with all community mental health and developmental services agencies. In the spring of 2008, DVR negotiated a new Ticket to Work

cooperative agreement with the agencies in anticipation of the new regulations to be published later that year. The new agreement has been in place since July 1, 2008 and has generated significant new revenue for providers that help beneficiaries earn at higher levels.

**(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment.**

DVR has a well-established agreement with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds.

DVR funds supported employment services for youth with emotional/behavioral disabilities in partnership with the Department of Mental Health, Children's Division. The JOBS programs are a model for serving this high need and high risk population. DVR provides the upfront job placement and support through grants to community agencies. The extended supports are provided through Medicaid Global Commitment funds.

In prior fiscal years, DVR also had an agreement with the Department of Mental Health to provide extended services for adults with significant mental illness served through the Community Rehabilitation and Treatment Program (CRT). In July 2015, DVR decided to reallocate the VR grant funds to Pre-Employment Transition Services in order to meet the federal mandate. The CRT programs continue to provide supported employment services using a Medicaid case rate funding model. DVR continues to partner with the CRT programs to provide VR services at the local level.

For individuals with other disabilities, no state funding for extended services exists in Vermont. As a result, there are limited options for providing extended services for individuals with brain injuries, sensory disabilities, severe learning disabilities and other disabilities. There are some limited options to use Social Security Administration Impairment Related Work Expenses or Plans to Achieve Self Support. These options however, are only feasible in a minority of cases.

**(g) Coordination with Employers.**

**(1) VR Services.**

**DUAL CUSTOMER DESIGN**

Vermont's dual-customer approach considers both individuals with disabilities and the business community as key customers of the Vocational Rehabilitation program. To that end, Vermont DVR has established a cadre of Business Account Managers across the state whose primary responsibilities are to develop and sustain relationships with the businesses in their respective communities. The Business Account Managers also facilitate local Employment Teams made up of the various employment

programs serving Vermonters with disabilities. The Employment Teams are designed to improve collaboration between programs and streamline employer outreach in order to maximize resources and increase opportunities for candidates served by the Vocational Rehabilitation program.

In addition to the Business Account Managers, Vermont DVR contracts Employment Consultants who provide placement services and assistance to individual candidates, including retention services. These Employment Consultants, in concert with their respective Business Account Managers, are in the community developing contacts and establishing relationships with businesses of all sizes. Due to the rural nature of Vermont, and the fact that trusting relationships are built over time, Vermont has successfully developed ways to track employer engagement.

## EMPLOYER DATA

DVR tracks employer outreach utilizing Salesforce, a Customer Relations Management (CRM) solution used by many large corporations. All Business Account Managers and Employment Consultants enter information into this system. The information is transparent to everyone and only business information, not client information, is captured. To track employer engagement, the following information is gathered:

### **Opportunities:**

Opportunities are defined as any activity, paid or unpaid, offered by a particular business. These activities range from informational interviews and job shadows, to short-term work experiences and paid employment. All opportunities are captured for each business.

### **Contacts:**

Contacts are defined as the individuals in a business with whom Employment Consultants and/or Business Account Managers have developed a relationship. In many cases these contacts are Hiring Managers, Owners and Supervisors.

### **Activities:**

Each time an Employment Consultant or Business Account Manager interacts with a contact, an activity note is entered into Salesforce. This allows all Employment Team members to see a running history of conversations and activities with that business.

## IMPLICATIONS FOR DVR CUSTOMERS

Business outreach has been a priority for Vermont DVR because:

- In developing relationships over time, we are able to position ourselves as a staffing service with a variety of options for businesses to consider;
- Coordinated business outreach, captured in Salesforce, allows for greater variety in the kinds of businesses we are meeting, and the concurrent variety in opportunities for DVR candidates;
- Gathering information on businesses willing to offer worksite experiences, company tours, and informational interview, will better support career exploration and skill development for both adults and students;

- Our business partners can support Pre-Employment Transition Services activities in schools, including practice interviews, company tours and overviews, as well as identify summer employment opportunities;
- Business partners can support the work of our in-school Transition Counselors, providing information on industry trends, skill requirements and other factors related to particular employment sectors;
- By engaging businesses in working with students, the students will have a better understanding of their local labor market through work experiences, job shadows and paid employment. This in turn should prepare them for transition to either post-secondary education or employment.

**(2) Transition services, including pre-employment transition services, for students and youth with disabilities.**

As noted in the prior section, the Business Account Managers are a major resource to the 14 DVR Transition Counselors and 14 Youth Employment Specialists, who work exclusively with students to provide Pre-Employment Transition Services. In particular the Business Account Managers provide:

- Contacts with employers who are willing to provide work based learning experiences for students;
- Contacts with employers who are willing to participate IN informational interviews, company tours, practice interviews and other exploratory activities with students;
- Information on industry trends, skill requirements and other factors related to particular employment sectors;
- Identification of summer or part time competitive employment opportunities for students.

The Business Account Managers also convene local employment teams including the Youth Employment Specialists. The local employment teams coordinate outreach to employers across DVR programs. This coordinated approach maximizes the impact of DVR employer outreach and reduces duplicate contacts with employers.

**(h) Interagency Cooperation. Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:**

**(1) The State Medicaid plan under title XIX of the Social Security Act.**

As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), DVR and DBVI are in the process of entering an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). The agreement will be in effect for five years once it is signed. The purpose of the agreement is to describe how Vocational Rehabilitation Title I and Title VI-B funding will be utilized with Medicaid Global Commitment funding to support employment services for the following populations:

- Supported employment services for adults with developmental disabilities served through the Vermont Department of Disabilities, Aging and Independent Living (DAIL) Developmental Disabilities Services Division, hereinafter referred to as DDSD.
- Youth with severe emotional disturbance (SED) served by the Department of Mental Health (DMH), Children’s Division through the JOBS programs.
- Adults with psychiatric disabilities served through the Community Rehabilitation and Treatment (CRT) program administered by the Department of Mental Health (DMH).

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide employment services for individuals with developmental disabilities, youth with SED and adults with psychiatric disabilities through a statewide network of community providers.

The agreement also lays out eligibility criteria for the respective programs and the financial responsibilities of each State unit as follows:

### **DAIL/DVR/DBVI Responsibilities**

#### **(A) Funding of Time-Limited Supported Employment Services**

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment
- Benefits and work incentive counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

#### **(B) Funding for Extended Supports**

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

### **DHVA Global Commitment Funding of Employment Services**

#### **(A) Developmental Services**

Supported employment and extended employment services are through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. DAIL/DDSD HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

**(B) JOBS Program**

The JOBS program supported employment services and extended employment services are funded through Global Commitment, Medicaid case rate funding administered by DMH. Funds will be provided through the DA Master Grant Agreements.

**(C) CRT Evidence Based Supported Employment Services**

CRT evidence-based supported employment services are funded through the Global Commitment, Medicaid CRT Case Rate administered by DMH. Funds will be provided through the DA Master Grant Agreements.

**(2) The State agency responsible for providing services for individuals with Developmental disabilities.**

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). An Intradepartmental Agreement was developed within DAIL and signed on September 5<sup>th</sup> 2017. The agreement is in effect for five years. The purpose of this agreement is to describe how DVR, DBVI and DDSD will cooperate to implement, expand and improve supported employment services for adults with developmental disabilities in the State of Vermont. Supported employment services for adults with developmental disabilities are provided through a system of approved nonprofit community providers, including the Designated Agencies (DA), the Specialized Service Agencies (SSA) and Independent Service Organizations (ISO). DDSD, DVR and DBVI fund supported employment services jointly through grant and contractual relationships with these community providers.

The agreement sets out the following guiding principles:

DDSD, DVR and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, DVR, DBVI and DDSD take a “one agency” approach to the funding and implementation of supported employment services for adults and youth with developmental disabilities.

DVR, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. DVR, DBVI and DDSD are committed to continuing this collaboration based on the following:

- All people with developmental disabilities, who want to, can work with the appropriate supports.
- Work benefits people with developmental disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.

- The value of work extends far beyond wages earned. Employers and the community benefit from the social inclusion and diversity people with developmental disabilities bring to the workforce through improved morale, customer loyalty and overall productivity.

The agreement includes an inter-division planning and policy group that will meet at least quarterly and include all of the Directors. There is a commitment to joint monitoring of supported employment services and joint training and technical assistance. The agreement also describes the eligibility criteria for each program and lays out the fiscal responsibilities as follows:

### **Joint Responsibilities**

DVR, DBVI and DDS D are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDS D Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for individuals with developmental disabilities through a statewide network of community providers.

### **DVR and DBVI Responsibilities**

#### **(A) Funding of Time-Limited Supported Employment Services**

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment

#### **(B) Funding for Extended Supports**

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DVR time-limited services. Extended services can be funded by DVR and DBVI for youth with the most significant disabilities, for a period not to exceed four years. DVR may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

#### **(C) Availability of Funding**

The DVR and DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DVR may reduce or end funding for supported employment services.

### **DDS D Responsibilities**

(A) Funding for Supported Employment Services and Extended Services

DDSD will fund supported employment and extended employment through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

(B) Availability of Funding

The DDSD commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DDSD may reduce or end funding for supported employment services.

**(3) The State agency responsible for providing mental health services.**

DVR and DMH have a long history of collaboration around the provision of supported employment services for adults with psychiatric disabilities and youth with severe emotional behavioral disorders. This is reflected in the MOU's overview and purpose as follows:

The purpose of this agreement is to describe how DAIL/DVR/DBVI and DMH will cooperate to implement, and improve employment services, supported employment services and evidence based supported employment services for youth and adults with psychiatric disabilities in the State of Vermont. Supported employment and employment services for youth and adults with psychiatric disabilities are provided through a system of approved non-profit community providers, including the Designated Agencies (DAs). DMH and DAIL/DVR/DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. There are two primary programs within the DMH system that provide employment services:

- The JOBS Program: JOBS provides supported employment services for youth with Severe Emotional Disturbance (SED)
- Community Rehabilitation and Treatment (CRT) Program: CRT provides employment services and supported employment for adults with severe psychiatric disabilities.

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities. DAIL/DVR/DBVI and DMH are committed to continuing this collaboration based on the following:

- All people with psychiatric disabilities, who want to, can work with the appropriate supports.
- Work benefits people with psychiatric disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.



- Employment is an essential component of the recovery process for people with psychiatric disabilities.

The agreement forms an interagency planning and policy development group including the DVR/DBVI Directors and the DMH Directors of Adult Mental Health and Children's Mental Health, and is in effect for five years from date of signature. The agreement also includes a commitment to joint monitoring of the programs and joint training and technical assistance. DAIL/DVR/DBVI and DMH support two models of individualized supported employment services in competitive, integrated employment settings. The agreement describes the eligibility criteria for both systems and the service models as follows:

## JOBS

The JOBS Program is an innovative supported employment and intensive case management service for youth with psychiatric disabilities, who have dropped out or left school. It uses work as a means to reach this challenging population. JOBS is a voluntary program where youth, once engaged, are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and greater independence.

### Individualized Placement and Support (IPS): Evidence Based Supported Employment Services

IPS supported employment is an evidence-based approach to providing vocational services for adults with severe psychiatric disabilities. IPS integrates employment services within community mental health treatment and case management services.

DAIL/DVR/DBVI and DMH do not support any type of group or segregated employment service model such as sheltered workshops, work crews, enclave placements or any approach that does not result in competitive, integrated employment. DAIL/DVR/DBVI and DMH will promote and support evidence based supported employment as the primary service model, through policy development, contract/grant language, training and technical assistance, and monitoring and quality review.

The agreement describes the fiscal responsibilities of the respective Departments as follows:

### **Joint Responsibilities**

DAIL/DVR/DBVI and DMH are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DMH Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for adults with psychiatric disabilities and youth with SED through a statewide network of community providers.

### **DAIL/DVR/DBVI Responsibilities**

#### (A) Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment
- Benefits and work incentive counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

(B) Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

(C) Availability of Funding

The DAIL/DVR/DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DAIL/DVR/DBVI may reduce or end funding for supported employment services.

**DMH Responsibilities**

(A) Funding for JOBS

DMH will fund the JOBS program supported employment services and extended employment services through Global Commitment, Medicaid Case Rate funding. Funds will be provided through the DA Master Grant Agreements.

(B) Funding for IPS Supported Employment Services and Extended Services

DMH will fund evidence-based supported employment through the Global Commitment, Medicaid CRT Case Rate. Funds will be provided through the DA Master Grant Agreements.

(C) Availability of Funding

The DMH commitment to funding JOBS and IPS supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DMH may reduce funding for supported employment services.

**(i) Comprehensive System of Personnel Development.**

**(1) Data System on Personnel and Personnel Development.**

**(A) Qualified Personnel Needs.**

DVR has a total of 121.5 Full Time Equivalent (FTE) staff positions. The Division operates using a matrix management structure headed by the Division Director. The breakdown of staff is as follows:

<b>Full Time Equivalents</b>	<b>Position Titles and Functions</b>
1	Division Director
6	Senior Central Office Managers including the Field Services Manager, Employment Services Manager, Quality Assurance and Business Systems Manager, DVR Administrative Services Manager, Budget and Policy Manager, and the Transition Program Director
7	Regional Managers overseeing the 12 district offices
13.5	DVR Transition Counselors serving in-school youth caseload
9	DVR Young Adult Counselors serving a youth caseload
29	DVR Counselors Serving an adult caseload
4	Benefits Counselors
2	Rehabilitation Counselors for the Deaf
17	Program Techs and Administrative Support Staff
12	Employee Assistance Manager and Specialists
1	Special Project Coordinator
1	Data Management and Program Evaluation Staff
3	Business Account Managers
2	Assistive Technology Staff and Manager
4	Miscellaneous Central Office Staff
10	Linking Learning to Careers Managers and Counselors

**(B) Personnel Development.**

Vermont has no accredited graduate school offering a master's degree in Rehabilitation Counseling. To meet the Comprehensive System for Professional Development (CSPD) standards, a counselor needs either a master's degree in Rehabilitation Counseling or a master's degree in a related field plus completion of four additional core rehabilitation courses. Assumption College, University of Massachusetts, and Springfield College of Human Services typically have a range of 35-45 students who graduate with a master's or CAG degree in Rehabilitation Counseling per year. These graduates would be qualified to fill counseling vacancies without additional coursework. New England colleges, which offer degrees in Social Work, Special Education School Guidance, Mental Health Counseling, or Community Mental Health Services, also produce qualified graduates.

Currently four (4) students are taking required core classes through Assumption University and UMASS Boston.

In the prior year, four (4) staff members met the educational requirements of the CSPD courses through Assumption University and University of Massachusetts. Additionally, two (2) other staff who already met the educational requirements through a related degree and core course completion, are voluntarily participating in a three year master's degree program in Rehabilitation Counseling through the University of Southern Maine, with the goal of obtaining Rehabilitation certifications as Rehabilitation Counselors upon completion.

## **(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel.**

DVR recruits qualified personnel through Assumption College, University of Massachusetts, and Springfield College of Human Services, who have received a master's degree in Rehabilitation Counseling. These graduates meet the highest standard of education and are able to obtain certification at the highest level for this field. DVR also recruits qualified personnel in a related field such as Social Work, Special Education, School Guidance, Mental Health Counseling, or Community Mental Health Services from New England colleges, by posting positions on internal employment pages of the various college websites. All of these graduates are candidates for counseling vacancies if they are willing to complete the four core rehabilitation courses.

State personnel policies require DVR to consider qualified applicants on the Reduction in Force list before other applicants. DVR advertises openings through the State recruitment system, through local newspapers (coordinated ad program), on-line on USA Today Job Network, and by listing openings through college placement services. Assumption College, University of Massachusetts, and Springfield College of Human Services advertise counselor openings by forwarding job opportunities to their list of recent graduates.

When recruiting staff to serve a specific population such as the deaf and hard of hearing, additional recruitment efforts are employed to reach professionals within that community and associated training programs. This has included posting in the Boston Globe and connecting with deaf and hard of hearing student organizations in New England based colleges.

The state of Vermont is an equal opportunity employer and there is emphasis on recruiting and hiring individuals with disabilities. We encourage DVR consumers to apply for posted positions and obtain the education necessary to be competitive. DVR also promotes close working partnerships with the Vermont Center for Independent Living, Designated Mental Health Agencies, the Refugee Resettlement program, Vermont Works for Women and other organizations who serve people with disabilities and/or are of a minority status.

## **(3) Personnel Standards.**

The Division follows standards set forth in the Comprehensive System for Professional Development (CSPD). This prescribes a national standard for vocational rehabilitation counselor qualifications. This standard gives highest priority to counselors with a master's degree in Rehabilitation Counseling. The second level of priority is for counselors with related degrees in Social Work, Psychology, Mental Health Counseling or Special Education. This group must complete four additional courses to meet the

standard: Foundations of Rehabilitation, Career Counseling, Vocational Assessment, and Medical and Psychosocial Aspects of Disability. When unable to recruit qualified candidates that meet the two highest levels, DVR hires counselors with bachelor's degrees and supports their graduate training through our RSA training grant. Though not required by the Division or by RSA, some counselors continue on to become Certified Rehabilitation Counselors (CRC) through the Commission on Rehabilitation Counselor Certification.

The following is a breakdown of the educational plans for DVR staff. These plans fall into a three category system, based on the availability of existing financial resources and are consistent with any national or State-approved or recognized requirements that apply to the profession or discipline in which personnel are providing VR services:

Category 1: Staff who meet the highest standards for education and/or certification: Staff in this category have completed a master's degree in Rehabilitation Counseling and/or have received certification as a Rehabilitation Counselor. DVR currently has ten (12) staff or 20% who are in this category.

Category 2: Staff who do not yet meet the highest standards and are currently enrolled in an approved graduate or undergraduate program: Staff in this category are pursuing a master's degree in Rehabilitation Counseling or a related field and have additional supervision and oversight. DVR currently has two (2) staff or 3% who are in this category.

Category 3: Staff who have graduate degrees in counseling or a related field and are required to take four core rehabilitation courses in order to comply with the CSPD requirements: DVR currently has nine (10) staff or 16% who are in this category.

The percentage of our current counselors having met the CSPD standard through Categories 1 and 3 is 82%, which is 50 Counselors out of 61. The timelines for meeting graduate training are written into the job specifications, which all candidates have access to on the State of Vermont Department of Human Resources website. Counselors are required to meet the standard within three years. All training information related to core courses and completion of master degrees is stored on a spreadsheet maintained by the Division's DVR training coordinators. Supervisors are given quarterly updates to monitor progress.

DVR staff upon hire, are required to attend a 30 hour DVR services training program taught by the Staff Development and Training Coordinator. This training covers DVR's Policies and Procedures Manual, the full vocational rehabilitation process from referral to successful closure, effective caseload management, collaboration with partners providing employment services, and all other aspects of the vocational rehabilitation.

#### **(4) Staff Development.**

##### **(A) System of Staff Development.**

Staff development opportunities are provided annually to ensure all personnel receive appropriate and adequate training in multiple categories that include assessment, vocational counseling, job placement, and rehabilitation technology.

DVR staff receive training related to assessment through webinars and in-person training offered by the Staff Development and Training Coordinator and Assessment Champion team, which is comprised of staff who are knowledgeable about administration, interpretation, and application of various vocational assessments. This team also reviews assessment tools on a yearly basis to identify those that are no longer relevant or those that need to be included in the DVR Assessment Inventory, which is a selection of assessment tools used to assess a person's interests, values, aptitudes, and skills. Skillful interviewing also serves as a form of assessment and DVR staff and contracted partners receive introductory and advanced training in Motivational Interviewing to enhance this skill set.

Motivational Interviewing (MI) training was introduced to DVR with comprehensive training for all staff in 2014. In alignment with the goals of the initiative, internal trainers are now in place statewide and provide monthly training for district staff. Statewide introductory and advanced MI trainings are offered quarterly for all new staff. Motivational Interviewing is a counseling approach that enhances counseling skills in many arenas and is an especially good fit for vocational rehabilitation counseling. Nationally, Motivational Interviewing is being used by many State Vocational Rehabilitation Agencies/Departments to provide services and effectively engage consumers in making changes that improve their lives. MI is a person-centered approach with a focus on client choice, self-efficacy, and autonomy. This practice is especially useful for consumers with disabilities. There are also well established results available regarding its effectiveness with those who experience substance abuse issues as disabling conditions. A high number of DVR consumers struggle with substance and alcohol addiction, which reinforces the relevance of having staff trained in MI techniques and practice. Sustainability of this initiative is underway and will occur through ongoing development of the internal DVR MI trainers to ensure training is available to all DVR staff and meets the training requirements of those providing direct service. The internal DVR MI trainers have already received additional MI focused facilitation training and next steps include advanced audio recording coding and scoring training. This will allow the MI trainers to evaluate staff level of proficiency in use of MI skills, strategies, and approach in the vocational counseling process with fidelity to the model/approach and design training and support that responds to the area needing development.

Staff development related to job placement is provided through several venues. Newly hired contracted staff who provide placement services, participate in a required online training program, created in collaboration by DVR and Community College of Vermont. Internal structures that ensure development of knowledge related to the labor market and effective job placement include regularly scheduled meetings hosted by the DVR funded Business Account Managers. One such meeting is comprised of employment staff connected by Creative Workforce Solutions, a DVR initiated collaboration of Agency of Human Services funded employment programs, which promotes cooperative job placement and employer relationships. Training related to rehabilitation technology is provided initially through the DVR services training program for new hires. Additional training and staff development is provided in collaboration with the Assistive Technology Program through

on-site, video conferencing, and webinar based trainings, information sessions, and regularly scheduled staff meetings.

A specific staff group, the DVR Benefit Counselors, receive specialized training to ensure the provision of quality services in working with customers who receive monetary or medical benefits. Ongoing training and support is provided by a DVR Project Manager. The local Social Security Administration (SSA) Area Work Incentives Coordinator provides quarterly trainings to the Benefits Counselors on a variety of SSA Work Incentives issues. SSA also provides training and technical assistance for Benefits Counselors through contracts with Cornell and Virginia Commonwealth University. DVR is the SSA Work Incentives Planning and Assistance grantee for the State of Vermont. The four Benefits Counselors working under that project are certified by SSA as Certified Work Incentive Counselors (CWIC). To achieve certification, Benefits Counselors must attend a week long training and complete a comprehensive “take home” assignment that is evaluated by Virginia Commonwealth University staff.

**(B) Acquisition and Dissemination of Significant Knowledge.**

The DVR training coordinators are the primary hub for dissemination of research and training resources to field staff. Program managers, including the Transition Program Director, the Employment Services Manager and the Benefits Counseling Program Coordinator collect and disseminate information from local and national resources. Program managers and staff are encouraged to become members of national organizations in their fields. Organizations like the National Skills Coalition or the National Association of Benefits Planning and Work Incentive Counseling (NABWIS) are excellent resources for managers and front-line staff.

**(5) Personnel to Address Individual Communication Needs.**

The Agency of Human Services has a contract with the Association of Africans Living in VT for on-site interpretation and translation services. If an appropriate interpreter is not available, the VT Refugee Resettlement Program has a contract with Language Learning Enterprise Inc. in Washington D.C. which provides telephonic interpretation.

**(6) Coordination of Personnel Development under the Individuals with Disabilities Education Act.**

The DVR Director and other senior managers meet quarterly with the Deputy Commissioner of the Agency of Education (AOE) and the Special Education Director to coordinate activities and trainings, especially around transition issues. DVR and AOE have a long history of co-sponsoring trainings and conferences for frontline staff.

**(j) Statewide Assessment.**

- (1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:**

**(A) With the most significant disabilities, including their need for supported employment services.**

The Rehabilitation Act (1973) requires the Vermont Division of Vocational Rehabilitation (DVR) and the Vermont State Rehabilitation Council (SRC) to jointly conduct a needs assessment every three years. The assessment is intended to form the basis for the DVR annual State plan and strategic planning activities. The 2017 DVR and SRC Needs Assessment focused particularly on the VR services needs of the following populations:

- Individuals with the most significant disabilities, particularly their need for supported employment;
- Individuals with disabilities who are minorities, including refugees;
- Individuals who have been unserved or underserved by DVR;
- Individuals with disabilities served through the statewide Workforce Investment System; and
- Individuals who are youth with disabilities and students with disabilities, including, as appropriate, their need for Pre-Employment Transition services or other transition services.

A comprehensive report of the results of the Vermont DVR and SRC Needs Assessment was submitted in 2017. The report includes data from a variety of sources, including DVR's Rehabilitation Services Administration (RSA) reporting database, information from the United States Census Bureau, the American Community Survey, as well as surveys conducted by DVR. Although not specifically designed to assess unmet needs, these surveys assisted DVR in determining ways to better serve individuals with disabilities, thereby making its services more accessible and welcoming to populations that may not be currently served.

**(B) Who are minorities.**

The ACS provides data on disability and race by state. Overall, 3.8% of Vermonters are from an ethnic minority. The following table shows the ACS estimates of the incidence of disability by race.

**Table 16: Incidence of Disability by Race for Adults Aged 18 to 64**

<b>Race</b>	<b>Total Number of Working Age</b>	<b>Percentage Reporting a Disability</b>	<b>Estimated Potential VR Eligible Consumers</b>
<b>White</b>	346,300	11.9	41,209
<b>Black/African American</b>	6,000	20.2%	1,212
<b>Asian</b>	5,600	22.4%	1,254
<b>American Indian</b>	1,900	16.5	313

The disability rates for African Americans and Asians in Vermont exceed the average. However, the estimates for the Vermont non-white populations with disabilities are from sample sizes of less than 40 people and too small to be statistically reliable. As a result, this data may substantially over state the actual rate of disability in these groups.

Vermont VR has consistently exceeded the federal RSA standard and indicator that measures access to services by eligible individuals who are minorities. In FFY 2016, 7% of DVR closures



were for individuals from an ethnic minority. Given this data it appears that individuals with disabilities from ethnic minorities are accessing the VR program at a rate proportional to individuals who are white.

**(C) Who have been unserved or underserved by the VR program.**

*Older Vermonters with Disabilities*

The percentage of individuals with disabilities age 55 and above, increased from 12.3% to 13.9% between 2013 and 2016. This seems to reflect the overall aging of the Vermont demographic. The percentage of people served over 65 also increased during this period, from 1% to 3%. Individuals over the age of 55 are working longer, not only for financial reasons but because people are living longer and choosing to remain in the workforce. It is likely that many individuals over the age of 55 experience disabilities and may be eligible for VR services. DVR now oversees the Senior Community Service Employment Program (SCSEP), and has hired a “Mature Worker Program Coordinator”. A primary role of the coordinator is to facilitate the referral of eligible individuals to DVR, by building and supporting strong linkages with services for mature workers.

*Individuals with Physical Disabilities*

DVR suspects that individuals with physical disabilities may be underserved, especially since the number of individuals with psychiatric disorders and substance disorders has increased. It may be that individuals with physical disabilities are not seeking services because their needs are less complex. In addition, DVR recognizes that employers require a more diverse selection of candidates to fill more skilled positions. Although DVR has initiated preliminary outreach to medical providers and community partners to diversify its caseload, more systematic and strategic planning is required.

*Individuals with Traumatic Brain Injury (TBI)*

It is estimated that at least 10,000 Vermonters are recovering from brain injury, but less than 5% of these individuals are seeking services to help them succeed in the workplace. DVR counselors and CRP (Community Rehabilitation Provider) staff have received training on TBI. There are no discrete employment services for individuals with TBI.

**(D) Who have been served through other components of the statewide workforce development.**

DVR does not currently have good data on the needs of individuals who have been served through other components of the workforce development system. As part of the WIOA Unified Plan DVR and VDOL and AOE will implement a variety of strategies to share data and coordinate service provision. A data sharing agreement was finalized in March 2017. This process will assist the three agencies develop a much better understanding of the needs of their consumers across programs. In particular, we expect closer coordination at the field level to result in an increase in consumers being served concurrently across programs.

**(E) Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

In 2017 DVR conducted a Comprehensive Needs Assessment including an assessment of the needs of youth and students with disabilities. The primary findings were as follows:

#### Strengths of the Vermont System

In the school year 2016-17, approximately 1 in 5 (18.5%) eligible students received Pre-ETS services statewide. This suggests DVR has been successful in making Pre-ETS services accessible to eligible students.

Overall, youth with disabilities appear to be accessing DVR services at a high rate (up to 35% of the eligible population). This data suggests DVR has been successful in making services accessible to youth.

DVR has a strong collaborative partnership with AOE at the state level. At the local level, almost all Vermont high schools are working in partnership with DVR to facilitate the provision of and access to Pre-ETS and transition services.

Vermont has a good infrastructure to provide supported employment for youth with developmental disabilities and emotional/behavioral disabilities.

#### Areas for Development in the Vermont System

Core transition teams have formed and met in all 12 Agency of Human Services districts. Most are in the early development stage however, and are working out local processes and agreements. These teams will need time and support to become fully functional and effective groups.

Youth with disabilities are less likely to obtain competitive employment during the transition years. Early employment experiences are a strong predictor of adult employment success. According to VFN, students who have had work experiences expressed more confidence in their ability to work. This suggests youth need more opportunities for real work based learning experiences and/or competitive employment.

Post-secondary education and training opportunities are key for students and youth with disabilities to access higher wage jobs and develop long term career opportunities. Students and youth with disabilities are less likely than their peers without disabilities, to access postsecondary education.

### **(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.**

Because of the small population and rural nature of Vermont, there are very few CRPs in the state. VABIR (the Vermont Association of Business, Industry and Rehabilitation) is the primary CRP for the DVR program with the exception of supported employment. VABIR has capacity to serve DVR consumers statewide and has an excellent track record. VABIR also serves individuals without disabilities through the state TANF program.

DVR provides grants to Vermont's Designated Agencies for employment services for individuals with developmental disabilities and individuals with severe and persistent psychiatric disabilities. Easter Seals also has a small presence in Vermont. While DVR is open to supporting the

development of new CRPs as well as existing CRPs who come to Vermont, there is limited funding available to support multiple agencies.

DVR partnered with other state agencies, VABIR and the Designated Agencies, to create an online training program for CRP staff hosted by Community College of Vermont. The program allows cohorts of employment staff to access training statewide. The content is modified to the specific populations served.

**(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.**

**(A) Students with Disabilities.**

The State of Vermont has sixty supervisory unions serving students in primarily rural communities. During the 2016 to 2017 school year, 5,390 Vermont high school students were served. All were either on an IEP or 504 plan, and therefore met the definition of a student with a disability.

**(B) Youth with Disabilities.**

According to American Community Survey (ACS), 7.5% of youth ages 16 to 20 (3,450) reported having a disability. The ACS does not provide data for youth ages 14 to 24 who report having disability, which is the WIOA definition. However, extrapolating the ACS data for youth ages 16 to 20 would suggest that there are approximately 8,600 youth with disabilities in Vermont. It is important to note that the ACS uses primarily self-reported data and youth may be less likely to self-identify as a person with a disability. Therefore, this number maybe an underestimate of the actual prevalence.

**(C) Employment Rates for Youth with Disabilities.**

The ACS provides data on the employment rate of youth with disabilities ages 16 to 20. As Table 4 shows, youth with disabilities are much less likely to be employed than their counterparts without disabilities at both the national and state level. It is well documented that early work experiences for students and youth are the best predictor of future employment. The gap in employment rates in this age group is likely to continue into adulthood unless students and youth with disabilities have opportunities for work based learning experiences.

**Table 4: Employment Rates for Youth With and Without Disabilities**

<b>Population</b>	<b>Total</b>	<b>Employed Count</b>	<b>Employed Percentage</b>
<b>US Youth without Disabilities</b>	20,268,600	7,539,919	37.2%
<b>Vermont Youth without Disabilities</b>	42,600	18,190	42.7%
<b>US Youth with Disabilities</b>	1,266,800	288,830	22.8%
<b>Vermont Youth with Disabilities</b>	3,400	952	28%

**(D) Postsecondary Education Outcomes for Adults with Disabilities.**

The ACS does not provide post-secondary education outcome data stratified by age group. However, it does provide highest level of education achieved for adults with and without disabilities. As the data in Table 5 indicates, adults with disabilities are much less likely to achieve a BA degree or higher than adults without a disability. Post-secondary completion has been associated with substantially level earnings over the lifespan. In the modern global and high technology economy this trend is likely to become more pronounced.

**Table 5: Adults With and Without a Disability Achieving a BA Degree or Higher**

<b>Population</b>	<b>Total</b>	<b>BA Degree or Higher Count</b>	<b>BA Degree or Higher Percentage</b>
<b>US Adults without Disabilities</b>	164,707,900	54,353,607	33%
<b>Vermont Adults without Disabilities</b>	320,700	127,318	39.7%
<b>US Adults with Disabilities</b>	19,703,800	2,758,532	14%
<b>Vermont Adults with Disabilities</b>	45,600	7,342	16.1%

**(E) VR Pre-Employment Transition Services.**

Once Pre-ETS was announced in October 2014, Vermont DVR moved quickly to come into compliance with the new requirement. As a state, we took a broad strategic approach to:

- Embrace the Congressional intent: try to build the best possible Pre-Employment Transition Services program possible;
- Reassign resources to support the best possible outcome; and
- Build on the existing well-established infrastructure of the DVR statewide transition program of specialized VR counselors.

Vermont took a life span view in our response to the Pre-ETS requirement. Since DVR was going to invest 15% or more of its resources providing Pre-ETS for high school students, we wanted to make sure there was VR capacity to serve them if they graduated on to VR services. Therefore, Vermont invested an equivalent amount of resources in youth post high school to preserve DVR's investment in Pre-ETS and to ensure eligible students had access to VR services. To achieve this DVR deployed its counselor resources as follows:

- 20% of VR counselor capacity (14.5 FTEs) assigned to serving exclusively high school students, providing and arranging for primarily Pre-ETS Required Services.
- 20% VR counselor capacity (14.5 FTEs) assigned to youth or young adults in the senior year of high school or after high school exit (18-27).
- 60% of VR counselor capacity serving adults (27+) including Rehab Counselors for the Deaf

In federal fiscal year 2017, DVR experienced a significant reduction in the VR grant award. This will require DVR to reduce our non-Pre-ETS counseling capacity. This has affected the number and deployment of counselors serving the out of school youth and young adult population. As of May 2017, DVR had 9 Young Adult counselors remaining from the original 14.

**(F) Staffing of Pre-ETS Required Services.**

14 VR counselors providing Pre-ETS services were deployed statewide to serve all 60 supervisory unions in the state. VR Counselors were out posted to an average of four high schools each, to ensure statewide access for eligible students. The daily presence of VR counselors in local high schools allows them to build strong working relationships and coordinate services with school staff.

DVR also contracted with our primary CRP VABIR, to support 14 youth employment specialists to provide Pre-ETS services. The school-based counselors and youth employment specialists essentially work as a team. The focus of the youth employment specialists is work place readiness training, arranging for work-based learning experiences and instruction in self-advocacy.

**(G) The Number and Proportion of Students Receiving Pre-ETS Services and/or VR Services.**

The number of students receiving Pre-ETS and/or VR services increased between the implementation of Pre-ETS in federal fiscal year 2015, and FFY 2016. This increase would be expected since Pre-ETS services were being ramped up during this period.

**Table 6: Students With Disabilities Served- Age 14 through 21 at Referral**

(00 status and above, open in period, in high school)		
Period	Cases	Persons
FFY 2015	852	846
FFY 2016	1,302	1,300

During the 2016/17 school year 1,019 students with disabilities were enrolled in Pre-ETS and/or VR services out of a potentially eligible population of 5,390. This means 18.9% of potentially eligible students were receiving Pre-ETS and/or VR services during the school year.

**(H) VR Services for Youth who have Exited High School.**

VR Transition counselors transfer students to a Young Adult or Adult VR counselor prior to high school exit. This generally occurs in the last semester of the student’s senior year, but may occur earlier based on circumstance. As noted earlier, DVR developed a cadre of 14 Young Adult counselors to match the capacity of VR Transition counselors serving students in school. The intent was to have specialized Young Adult counselors who understand the needs of youth in transition. Unfortunately, due to reductions in federal funding, DVR no longer has the capacity in smaller offices to offer this level of specialization. In some offices, the Young Adult counselor role has been converted to a general counselor role serving all age groups. As of May 2017, DVR had 9 Young Adult counselors remaining from the original 14.

DVR is concerned that the loss of Young Adult counselors may have an impact on services for youth who have graduated from high school. It has been Vermont’s experience that serving youth is more qualitative than serving adults and requires a different approach. Historically, VR Transition Counselors served both in and out of school youth, and received specialized training

and support focused on serving youth. The loss of this specialization may have an impact on youth services and outcomes.

**(I) Supported Employment Services for Youth.**

In addition to core VR services, DVR partners with other state agencies to fund the JOBS program. The JOBS Program is an innovative supported employment and intensive case management service for youth with SED, who have left or dropped out of school. The program is voluntary and uses work as a means to reach this challenging population. Once engaged, youth are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and achieve greater independence. The funding comes from a combination of state funds and Medicaid match from Vocational Rehabilitation, Mental Health, Corrections and Children and Family Services.

In addition to community and state partners, JOBS programs involve employers in meeting the needs of youth through intensive job development, placement, and on and off-site training support. Employment is a non-stigmatizing service that youth want and need. JOBS programs differ from other traditional employment models by providing intensive case management services to assist with other areas of need including legal issues, benefits counseling, homelessness, drug/alcohol abuse, and probation and parole.

**(J) Supported Employment for Youth with Disabilities.**

Vermont has a very strong supported employment infrastructure for youth with developmental disabilities that has been recognized both nationally and internationally. Employment retention for eligible students who exit high school with a job is a priority for the Developmental Disabilities Services Division (DDSD) and is included in their System of Care Plan. This creates a strong incentive for schools and DVR to help youth with developmental disabilities find employment before they exit high school.

DVR and DDSD collaborate to identify students who have a developmental disability and are likely to graduate. The June Graduates survey assists DDSD and DVR to effectively plan for transitioning students district by district. It also allows DDSD to predict caseload funding needs statewide.

DVR has also partnered with DDSD to provide post-secondary education options for individuals with developmental disabilities. Vermont has four post-secondary programs for individuals with developmental disabilities including Project Search, SUCCEED, and College Steps. In general DVR funds tuition and ancillary supports and DDSD funds staffing costs.

**(K) The Number and Proportion of Youth Receiving Services.**

Transition and Pre-ETS services naturally overlap to a significant degree. As noted, the VR Transition counselors are exclusively serving the student population in partnership with the contracted VABIR Youth Employment Specialists. Youth who have exited high school are served by a VR counselor specializing in youth and young adults or a general counselor. The total number of youth served by VR has increased modestly since 2015, most likely due to the increase in students served under Pre-ETS.

**Table 7: Youth With Disabilities Served- Age 14 through 24 at Referral**

(00 status and above, open in period)		
Period	Cases	Persons
FFY 2015	3229	3091
FFY 2016	3320	3202

Based on the ACS data, DVR estimates there were 8,600 youth with disabilities in the state of Vermont in 2015. DVR served 3,091 youth with disabilities during federal fiscal year 2015. This suggests that DVR is serving up to 35% of the eligible population. As noted earlier, DVR suspects the ACS data may underestimate the true number of youth with disabilities because young people often do not want to identify as having a disability.

DVR coordinates VR services with services provided under IDEA (Individuals with Disabilities Education Act) at both the state and local level.

#### State Level

The Vermont Agency of Education (AOE) and DVR have agreed to meet quarterly to discuss the coordination of services within local school districts. In general, those meetings include the following:

- The DVR Director
- The DVR Transition Program Director
- The AOE Special Education Director
- The AOE Postsecondary and Transition Coordinator

In addition to the above, DVR and AOE have frequent ad hoc meetings related to transition services and to plan joint initiatives. DVR and AOE are currently collaborating around the implementation of the Linking Learning to Careers demonstration funded through the federal Department of Education. LLC is an exciting new opportunity to improve career and college readiness outcomes for Vermont high school students with disabilities. This 5-year statewide initiative will build on effective career exploration and employment services already provided to students and engage them in additional experiences that will help them successfully transition from high school into adulthood. LLC is a powerful collaboration of the following partners: Community College of VT (CCV), VABIR, the Agency of Education, high schools, career and technical education centers, and DVR. It is expected that the partnership with CCV in particular will open up post-secondary education opportunities for students with disabilities.

#### Local Level

A primary responsibility of the VR Transition counselor is to coordinate services with the schools. VR Transition counselors spend the bulk of their time in schools, working directly with special education staff and teachers to provide services to students. This strong on the ground presence allows VR Transition counselors and school staff to build close and collaborative working relationships.

In order to improve transition outcomes for students, DVR took the lead in forming core transition teams in all twelve districts last year. The purpose of the core transition team is to bring DVR, schools, and community agencies together to improve collaboration around services for transitioning students. The core teams include:

- Local school staff
- DVR
- Developmental services providers
- Children's and adult mental health providers
- The Department of Labor youth staff
- Other youth programs

The core transition teams are still in the early development. As of May 2017, all 12 have had at least one meeting.

**(k) Annual Estimates.**

**(1) The number of individuals in the State who are eligible for services.**

Based on the American Community Survey (ACS) for 2014, DVR estimates that there are 45,076 Vermonters between the ages of 16 and 64 with a disability. All of these people are potentially eligible for services under this Plan

**(2) The number of individuals who will receive services under:**

**(A) The VR Program.**

An estimated 8,134 individuals will receive VR Program services in FY 2018 with funds provided under either Part B of Title I of the Act or under Part B of Title VI.

**(B) The Supported Employment Program.**

For FY 2017 we estimate that 400 individuals will receive supported employment services through DVR. This number does not include individuals receiving extended supported employment services funded through Medicaid and other non-VR funding sources.

**(C) Each priority category, if under an order of selection.**

On July 1, 2016, DVR transitioned to a new Order of Selection with four categories instead of three. Under the new order of selection we estimate that:

- 5,806 Priority Category 1 customers will be served;
- 2,021 Priority Category 2 customers;
- 299 Priority Category 3 customers; and
- 22 Priority Category 4 customers.



For FY 18 we expect Category 4 to be a closed Category and individuals found eligible under this category to go on a waiting list. DVR will consult with the SRC at least quarterly to determine if the category should be opened.

**(D) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection.**

Under the new Order of Selection we anticipate that individuals under the new Category 4 will be on the waiting list for the program. We estimate about 22 individuals will be found eligible under this Category in FY 18.

**(E) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.**

Total costs to serve individuals in all four categories for FY 17 will be approximately \$15,058,401. Estimated costs of services for each category are:

- Priority Category 1: \$8,892,982 Title I, \$142,059 Title VI-B
- Priority Category 2: \$5,632,221 Title I, \$94,706 Title VI-B
- Priority Category 3: \$250,000 Title I
- Priority Category 4: \$46,433 Title I

**(I) State's Goals and Priorities.**

Based on the DVR/SRC Needs Assessment completed in December of 2017, DVR and the SRC have established targets for Program Year 2019 for DVR's Strategic Plan goals. DVR and the SRC have also established goals and priorities in response to the new mandates and requirements included in the Workforce Innovation and Opportunities Act (WIOA). In particular, DVR and the SRC established goals and priorities related to the implementation of the WIOA Common Performance Measures. All DVR goals and priorities are established within the Division's long established strategic themes as follows:

- *Organizational Effectiveness*
- *Valued and Empowered Employees*
- *Prepared Job Seekers*
- *Collaborative Partnerships*

**(A) Program Year 2019 Goals and Priorities.**

**1. DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.**

Program 2019 Measures:

- a. Employment retention six months post closure

- b. Employment retention twelve months post closure
- c. Median earnings six months post closure
- d. Credential attainment rate
- e. Measurable skills gains
- f. Employer engagement

Program Year 2019 Target: DVR will be collecting and reporting baseline data to RSA during this period.

- 2. DVR will increase the percentage of consumers earning over 110% of minimum wage and over 150% of minimum wage at closure.** DVR believes in order to increase median earnings six months post closure, the agency must increase earnings at closure. Based on Needs Assessment data from 2017, 55% of DVR consumers were earning 110% of minimum wage or less at closure and only 18% of DVR consumers were earning over 150% of minimum wage at closure.

Program Year 2019 Measures:

- a. The percentage of DVR consumers with earnings greater than 110% of minimum wage at employment closure.
- b. The percentage of DVR consumers with earnings greater than 150% of minimum wage at employment closure.

Program Year 2019 Targets:

- a. 55% of DVR consumers will earn 110% or greater of minimum wage at closure.
- b. 25% of DVR consumers will earn 150% or greater of minimum wage at closure.

- 3. DVR will increase consumer opportunities to participate in and gain industry recognized credentials in middle skills professions.** Industry recognized credentials are a proven mechanism for consumers to access higher wage employment. This will include sector-based training programs in collaboration with the Career and Technical Education Centers and Community College of Vermont.

Program Year 2019 Measure: Number of individuals achieving credential attainment.

Program Year 2019 Target: DVR will be collecting baseline data during this period.

- 4. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).** Employer engagement continues to be a critical activity to ensure DVR consumers have access to employment opportunities.

Program Year 2019 Measure: Employer engagement with DVR as tracked through the CWS Salesforce account management system.

Program Year 2019 Target: DVR will maintain active relationships with 2,500 employers statewide during the program year.

- 5. Consumer satisfaction with DVR services will be maintained or increase.**

Program Year 2019 Measure: Bi-annual consumer satisfaction survey.

Program Year 2019 Target: DVR will achieve an 87% or better overall consumer satisfaction rating. Consumers reported an 87% overall satisfaction rating in the most recent survey (2016).

DVR will also develop a process to assess student and parent satisfaction with Pre-ETS services. DVR will explore approaches to conducting such an assessment and develop metrics to track.

- 6. DVR will implement a comprehensive quality assurance process incorporating the new AWARE case management system.** In 2017 DVR successfully implemented the AWARE case management system. This system will provide DVR with a powerful new tool to upgrade the quality assurance process.

Program Year 2019 Measure: Design and implementation of the quality assurance system.

Program Year 2019 Target: Process evaluation of QA system (to be determined).

- 7. DVR will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.**

Program Year 2019 Measures:

- a. The percentage of high schools statewide that have at least one student actively participating in Pre-ETS through DVR.
- b. The percentage of all potentially eligible students statewide who are participating in Pre-ETS through DVR.

Program Year 2019 Targets:

- a. 90% of high schools statewide will have at least one student participating in Pre-ETS through DVR.
- b. 20% of potentially eligible students will participate in Pre-ETS through DVR

- 8. DVR will implement the following strategies to mitigate FFY 2016 and FFY 2017 reductions in re-allotment funding that resulted in substantial cuts in services and capacity:**

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
- Increasing program income through the Ticket to Work program;
- Exploring federal and state grant opportunities to pilot new service models; and
- Continually assessing the assignment of DVR resources to ensure funds are going toward activities that are most likely to result in an employment and career outcome.

Program Year 2019 Measures:

- a. State government or other community agencies that have contributed resources to sustain programs affected by the loss of re-allotment.
- b. Social Security Administration Ticket to Work and Cost Reimbursement revenue.
- c. Federal or state grant applications.

Program Year 2019 Targets:

- a. Baseline
- b. DVR will generate \$2.5 million in Ticket to Work Revenue in Program Year 2019.
- c. DVR will apply for at least one grant application in Program Year 2019.

**9. With the implementation of Pre-ETS, the DVR caseload has trended towards serving a younger cohort. DVR needs to ensure the needs of middle-aged and mature workers are still adequately addressed, and in particular, the following cohorts:**

- Adults ages 35 to 55
- Adults aged 55 and above

Program Year 2019 Measures:

- a. The number of individuals receiving services in these cohorts.
- b. The employment outcomes by age cohort.
- c. Consumer satisfaction as measured in the DVR satisfaction survey.
- d. Services provided by age cohort.
- e. Other measures as identified by DVR and the SRC.

Program Year 2019 Target: DVR will be collecting baseline data for this reporting period.

**10. DVR will continue to seek options for supported employment for the following underserved populations in the state:**

- a. Individuals with developmental disabilities who do not meeting the developmental services system eligibility criteria or system or care priorities;
- b. Individuals with TBI who need onsite support;
- c. Individuals with psychiatric disabilities who do not meet the Community Rehabilitation and Treatment eligibility criteria; and
- d. Individuals with other severe disabilities who need supported employment.

Program Year 2019 Measure: DVR will track and report the results of specific initiatives related to these populations.

Program Year 2019 Target: Thirty individuals in the above categories will receive supported employment services.

**11. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.**

Program Year 2019 Measure: Total number of consumers achieving a successful employment outcome (VR 26 closure).

Program Year 2019 Target: A total of 250 successful employment outcomes.

**(B) Identify the goals and priorities in carrying out the VR and Supported Employment programs.**

See Goals 10 and 11 in Section (A)

**(C) Ensure that the goals and priorities are based on an analysis of the following areas:**

The goals and priorities outlined in the prior sections were based on the DVR and SRC Needs Assessment as outlined in Section (j). In addition, they were informed by the new Common Performance Measures. Finally, DVR and the SRC established goals and priorities related to Pre-Employment Transition Services.

Based on the data gathered and discussions with the State Rehabilitation Council, DVR Senior and Regional Managers, and the DVR Implementation Team, the following are the key findings of the 2017 DVR Needs Assessment (*not* in priority order):

***The need for increased attention to the employment needs of the mature worker.***

Despite a very modest increase, the overall percentage of VR consumers over 65 remains very low (3% in FFY 2016). This is despite the fact that Vermont has an aging demographic. Older Vermonters are increasingly staying in the workforce beyond normal retirement age for financial reasons or just because they want to. Many mature workers may experience age related disabilities and could benefit from DVR services. It is not clear why they are not seeking DVR services in greater numbers, and this is an area DVR may need to research in partnership with programs serving older Vermonters.

***DVR needs to identify and implement strategies to increase consumer hourly wages at closure.***

In FFY 16 55% of individuals were closed earning less than 110% of minimum wage. While this can partly be explained by the concurrent increases in the state minimum wage in 2015 and 2016, it is still an area of concern. The minimum wage in Vermont was \$9.60 in 2016. This compares to a median hourly wage for all occupations in Vermont of \$18.23 for 2016. While entry level employment is appropriate for some consumers, DVR should be looking at ways for individuals to move up the career ladder into higher wage employment.

***DVR consumers need opportunities to gain industry recognized credentials in middle skills professions.***

DVR data suggests that consumers who gain industry recognized certifications such as Licensed Nursing Assistant (LNA) or Commercial Driver's License (CDL), are closed in higher wage employment. Such middle skill certifications are often the quickest way to help individuals move from entry level employment to higher paying employment with genuine career prospects. There is a high demand from employers for individuals with these types of certifications. Historically, DVR has set aside case service funds to support consumers in certification programs. DVR may need to expand these set asides and look at more system wide efforts to make these opportunities available.

***The implementation of Pre-ETS has shifted the DVR caseload to serve a higher proportion of younger people.***

The implementation of Pre-ETS appears to have had the effect of skewing the entire VR caseload towards a younger age group. This is in part because VR also added Young Adult counselors to meet the needs of students who engaged with VR as high school students and needed to transition into the adult caseload. DVR may need to consider new ways of providing services to younger people that matches their specific interests and needs. DVR may also need to pay attention to the needs of adults 35 and older. The number of adults age 35 to 55 has dropped significantly since the implementation of Pre-ETS.

While this change in the overall caseload is predictable, DVR should be careful not to overlook the needs of this age group.

***The loss of re-allotment funding requires DVR to plan and manage services with reduced resources.***

As previously noted, the loss in re-14allotment funds resulted in significant cuts to the DVR program in FFY 17. DVR has managed those reductions while retaining the core services of the program. Going forward DVR will develop and implement strategies to offset this loss through:

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
- Increasing program income through Ticket to Work and other opportunities; and
- Looking for federal and state grant opportunities to pilot new service models.

DVR will also need to continually assess the assignment of resources and their impact on consumer services and outcomes. With limited resources it is especially important DVR invest funds in activities that are most likely to result in high quality employment outcomes.

***DVR must develop strategies to meet and exceed the outcome targets under the Common Performance Measures.***

The WIOA Common Performance Measures significantly change the way DVR is measured. The emphasis on career development, credential attainment, and measurable skills gains, will require DVR to consider changing current practice. As previously noted, DVR will be looking at strategies to increase wages and assist consumers in obtaining industry recognized credentials. In addition DVR will look at how to help consumers develop a career path.

***DVR should consider developing job coach capacity for adults and youth with severe disabilities who are not eligible for existing supported employment programs.***

DVR has recognized for many years that there are consumers with significant disabilities who require on job support to maintain employment, but who are not eligible for existing supported employment programs, like CRT or Developmental Services. These include individuals with TBI, psychiatric disabilities, developmental disabilities, and individuals with multiple disabilities. Field staff have recently experimented with hiring job coaches directly as temporary state employees, instead of contracting out for the service. This approach has proved more flexible and responsive to consumer needs. It also may be more cost effective.

***The need for sector-based training and collaboration with technical centers.***

Training programs, particularly for youth who are not planning to go to college, are inconsistently available across the state. Technical Centers connected to high schools sometimes offer adult training and some have been willing to work with employers to develop sector-based training programs. A more systematic approach to training would ensure that employers are able to hire skilled workers for available positions within their companies.

***The need for a comprehensive quality assurance system incorporating the new AWARE case management system .***

VR would like to develop a quality assurance system that will ensure a cycle of continuous improvement. VR is part of a New England effort to develop such a system. The system would organize and align a state's organizational goals and objectives; performance measures; program evaluation; data analysis; and dissemination and communication strategies. In September 2017 DVR went live with an electronic case management system, called AWARE. Aware is a powerful tool that is capable of producing data that managers and staff can use to inform practice and support quality work. DVR is still in the process of understanding how Aware works and how best to use it. DVR is a data driven organization and AWARE significantly upgrades our capacity to use data effectively.

**(D) The State's performance under the performance accountability measures of section 116 of WIOA.**

with all states, Vermont began collecting and reporting data for the WIOA Common Performance Measures in program year 2018. Program years 2018 and 2019 will be baseline data collection periods before targets are set for 2020. As noted, a major goal and priority for DVR will be realigning services to meet the WIOA measures. DVR has outlined our strategic approach to meet this priority area in Section (o).

**(E) Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.**

Not applicable.

**(m) Order of Selection.**

**(1) The order to be followed in selecting eligible individuals to be provided VR services.**

Vermont continues to operate under the order of selection established in FFY 1999. With the approval of the State Rehabilitation Council, the Category definitions have been rewritten in FFY 2017 to clarify the intent of the Rehabilitation Act to serve those most in need of services. These Category definitions replace the definitions that were in the FFY 2015 State Plan.

**Category I:** Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in four or more areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

**Category 2:** Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in two to three areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

**Category 3:** Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

**Category 4:** Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of less than six months.

**(2) The justification for the order.**

DVR made the changes to the definitions of Categories 1, 2, 3 and 4 because the old definitions did not provide sufficient clarity for counselors. As a result, a high proportion of eligible individuals were found to be eligible under Category 1. Based on data from the last eighteen months, it is clear the new Categories are better at identifying individuals with the most severe disabilities.

With the loss of re-allotment funding DVR has considered closing one or more of the current open categories. However, two factors have enabled DVR to maintain Categories 1, 2 and 3 in an open status. First, DVR has been very successful in generating program income through the Ticket to Work program. In calendar year 2017, DVR received \$2.5 million in Ticket payments. This income has helped offset the loss of re-allotment. Second, DVR's strong partnerships with other state agencies allowed for those agencies to pick up funding for some programs that DVR had funded. Specifically, the Department of Mental Health agreed to fund a peer directed supported employment program for individuals with psychiatric disabilities. Also, the Alcohol and Substance Abuse Division funded employment services housed in peer run recovery centers. These partnerships enabled DVR to focus resources on core VR services.

**(3) The service and outcome goals.**

For FFY 18, DVR expects to serve the following number of individuals in each category:

- Category 1: 5,806
- Category 2: 2,021
- Category 3: 299

DVR projects the following rehabilitation outcomes for the individuals found eligible under the Order of Selection. These are the projected outcomes over the lifetime of the above cases:

- Category 1: 3,193
- Category 2: 1,111
- Category 3: 165

**(4) The time within which these goals may be achieved for individuals in each priority category within the order.**

Individuals found eligible under Categories 1, 2 and 3 are expected to require at least six months of services from the development of the plan to the achievement of the employment goal. The actual



amount of time needed will vary widely depending on the goals and needs of the individual. On average in Vermont it takes 13 months from application to successful employment outcome for individuals in the above Categories.

Individuals found eligible under Category 4 will be expected to achieve their employment goal within six months of plan development. However, these individuals will have to wait one or more quarters for the Order of Selection to be opened (if it is opened), before a plan can be developed. Therefore, assuming one quarter for the Order of Selection to be opened and up to 90 days for plan development, outcomes for individuals under this category may take up to one year or more.

**(5) How individuals with the most significant disabilities are selected for services before all individuals with disabilities.**

In Vermont services for Category 1 eligible individuals are never delayed (as long as they are available for services), when eligible individuals in Priority Categories 2, 3 or 4 are open for services. This assumes all other variables are equal such as application date, IPE date and the individual's availability for services at any given time.

**(6) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.**

Vermont DVR has elected to serve eligible individuals, regardless of the order of selection, who require specific services or equipment to maintain employment.

**(n) Goals and Plans for Distribution of Title VI Funds.**

**(1) Funds Under 603 of the Rehabilitation Act for the provision of supported employment services.**

At the time of this writing, Title VI-B funds have not been appropriated for FFY 2018. DVR has \$200,000 in VI-B carry over funds from the FFY 17 award. These funds will be directed to the JOBS supported employment program serving youth ages 16 to 22.

**(2) Activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:**

**(A) The provision of extended services for a period not to exceed 4 years.**

DVR has committed VI-B funding for youth to the JOBS program, because that program is specifically designed to serve eligible youth with the most severe disabilities. A description of the JOBS program is outlined in other sections of the plan.

DVR counselors will authorize the use of funds for extended services through the JOBS program for up to the maximum of four years.

**(B) Leveraging other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth.**

As noted in Section (F), DVR has a partnership with the Department of Mental Health (DMH) to provide extended services for youth and adults with psychiatric disabilities. The JOBS program uses

Medicaid Global Commitment funds to provide extended supports post DVR closure. In addition, the adult mental health program can provide ongoing supports through the Medicaid case rate for individuals eligible for the Community Rehabilitation and Treatment (CRT) program or outpatient Medicaid Case Management services.

Also as noted in Section (F), DVR has a partnership with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds.

**(o) State's Strategies to Achieve Goals and Priorities.**

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

**(1) The methods to be used to expand and improve services to individuals with disabilities.**

- A. DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.
- B. DVR will increase the percentage of consumer earnings over 110% of minimum wage and 150% of minimum wage at closure. DVR believes a major lead indicator of median earnings six months post closure are earnings at closure. Based on Needs Assessment data from 2017, 55% of DVR consumers were earning 110% of minimum wage or less at closure and only 18% of DVR consumers were earning over 150% of minimum wage at closure.
- C. DVR will increase consumer opportunities to participate in and gain industry-recognized credentials in middle skills professions. Industry-recognized credentials are a proven mechanism for consumers to access higher wage employment. This will include sector-based training programs in collaboration with technical centers.
- D. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS). Employer engagement continues to be a critical activity to ensure DVR consumers have access to employment opportunities.
- E. Consumer satisfaction with DVR services will be maintained or increase;
- F. DVR will implement a comprehensive quality assurance process incorporating the new AWARE case management system. In 2017 DVR successfully implemented the AWARE case management system. This system will provide DVR with a powerful new tool to upgrade the quality assurance process.
- G. DVR will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.
- H. DVR will implement the following strategies to mitigate FFY 2016 and FFY 2017 reductions in re-allotment funding that resulted substantial cuts in services and capacity:

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
  - Increasing program income through the Ticket to Work program;
  - Exploring federal and state grant opportunities to pilot new service models; and
  - Continually assessing the assignment of DVR resources to ensure funds are going toward activities that are most likely to result in an employment and career outcome.
- I. With the implementation of Pre-ETS, the DVR caseload has trended towards serving a younger cohort. DVR needs to ensure the needs of middle-aged and mature workers are still adequately addressed, and in particular, the following cohorts:
- Adults ages 35 to 55
  - Adults aged 55 and above
- J. DVR will continue to seek options for supported employment for the following underserved populations in the state:
- Individuals with developmental disabilities who do not meeting the developmental services system eligibility criteria or system or care priorities;
  - Individuals with TBI who need onsite support;
  - Individuals with psychiatric disabilities who do not meet the Community Rehabilitation and Treatment eligibility criteria; and
  - Individuals with other severe disabilities who need supported employment
- K. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Programs

The following are the strategies that will be implemented by Vermont DVR to achieve one or more of the goals and priorities. Each strategy is linked to the goals and priorities it is intended to address.

**Strategy 1: DVR will implement a portfolio of projects designed to realign staff practices, services and assignment of resources to meet the WIOA. Goals 1, 2, 3, 4 and 8.**

DVR has identified a portfolio of twelve domains the Division will focus on to maximize DVR outcomes under the WIOA Common Performance Measures. These strategy areas of focus will be developed into projects during Program Year 2019. The areas of focus are:

- DVR allocation of resources reflects the program qualitative measures.
- Every step of the rehabilitation process will message and support the DVR commitment to careers.
- DVR casework practices will support serving consumers more than once on their journey. DVR will create a system to reach out to closed cases. DVR consumers will be encouraged to have a short term and long term vocational goal.
- DVR Counselors will provide long term aspirational career counseling. All staff will be trained to support long term career goals.

- Motivational Interviewing (MI) coaches will facilitate coaching circles that support career counseling using MI strategies.
- All DVR staff will be trained to do vocational assessments and use assessments as a career planning tool.
- A continuum of Progressive Education (parallel to Progressive Employment) will be developed and implemented.
- An education and training matrix will be completed in each district, including a gap analysis.
- All staff will be familiar with education and training providers in their communities, as well as what career pathways and stackable credentials are offered. Counselors will be able to speak to consumers about possible career paths, based on assessments.
- BAMs (Business Account Managers) understand the career paths in the businesses they serve.
- AWARE will support the Careers Initiative.
- A new “dashboard” using “leading” measures will be created that reflects the Common Performance Measures.

**Strategy 2: Expand training opportunities in industry recognized certifications that result in higher wage job opportunities for DVR consumers. Goals 1, 2, 3 and 5.**

Since 2015, DVR has set aside funds to specifically support consumers’ access to training for industry recognized certifications in high demand and higher wage fields. Data suggests consumers who participate in these trainings exit the program with higher wage jobs. Also, the skills and qualifications consumers achieve are meeting the demands of local employers. Therefore, DVR plans to improve and expand these opportunities as follows:

- DVR will maintain and expand the funds set aside for industry recognized trainings and certifications with an emphasis on middle and higher skill jobs in high demand sectors.
- DVR will develop partnerships with employers, the Vermont Department of Labor, local Workforce Investment boards and the technical centers, to expand the number and type of training opportunities available.
- DVR will track consumer participation and outcomes to determine which training programs are the most effective in terms of higher wages and career growth.

**Strategy 3: Implement a comprehensive quality assurance system utilizing the AWARE case management system. Goals 4, 5, 6 and 7.**

In September 2017, DVR went live with the AWARE case management system. AWARE greatly increases DVR’s capacity to manage and assess the quality of services. This includes:

- An adaptable quality assurance tool built into the AWARE system.
- The Power BI tool to analyze AWARE data in greater depth.
- The ability to develop “dashboards” of leading quality indicators to measure staff and program performance.

DVR will develop a QA system that does not simply measure compliance but actually looks at the total picture including the quality and effectiveness of services provided. This will also look at which

practices are resulting in positive outcomes and if the assignment of time and resources are being deployed effectively.

**Strategy 4: Coordinate efforts with the Agency of Education (AOE) and the Department of Labor (VDOL) to ensure individuals with disabilities have access to other components of the workforce system. Goals 1, 2, 3, and 8.**

As noted in the Unified Section of the plan, DVR will be working closely with VDOL and AOE to ensure DVR consumers have access to all the workforce development opportunities available in their communities. DVR will be implementing a number of strategies to make this happen including the following:

- The development of joint training programs in high demand and high wage sectors.
- Developing systems to promote co-enrollment across programs to support consumer employment goals.
- Actual or virtual co-location of DVR and VDOL staff. Cross training of VDOL, DVR and AOE staff.

**Strategy 5: Continue to implement and improve Pre-Employment Transition Services (PETS) for students. Goals 1, 3, 5 and 7.**

Vermont DVR has developed a comprehensive strategy to implement Pre-ETS in the state. Implementation started in the spring of 2015, and now Pre-ETS are fully operationalized. The following are the primary activities:

- Vermont DVR has implemented an in school Transition Counselor model providing Pre-ETS services. DVR has reassigned 20% of the program's VR counseling capacity (13.5 FTEs) to work exclusively with students. This provides coverage to all 60 supervisory unions and high schools in the state.
- DVR has worked with its primary CRP, VABIR, to implement the Youth Employment Specialist (YES) model. A full time YES will be paired with each in school VR counselor to provide a range of Pre-ETS services including the development of real work based learning experiences.
- DVR has implemented self-advocacy services for students through a contract agreement with the Vermont Center for Independent Living (VCIL).

DVR has been successful in establishing a high quality Pre-ETS program accessible to students statewide. In addition, DVR will use the Linking Learning to Careers (LLC) project funded through the RSA Work Based Learning demonstration, to explore innovative new practices. The LLC project is an experimental design demonstration that will test the following innovations:

- The provision of Career Consultation services.
- Graduated work based learning experiences including competitive employment.
- Dual enrollment in post-secondary programs for high school students.
- Youth assistive technology services.
- Assistance with transportation.

We believe the LLC demonstration will provide rich information for Vermont and other states around how to provide Pre-ETS services.

**Strategy 6: Expand employer outreach and engagement efforts through Creative Workforce Solutions (CWS) to effectively meet the needs of employers. Goal 4.**

As described in Section (g) of the State Plan, CWS is the primary employer outreach and engagement infrastructure for DVR. CWS, and in particular the Business Account Managers, have been a very effective approach to engaging employers and developing employment opportunities for DVR consumers. DVR will expand these efforts through the following strategies:

- Seek opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Analyze Salesforce account management data to determine if there are industry sectors that are underrepresented. Develop strategies to engage those sectors in partnership with local employers.
- Build on and expand employer events such as Job Fairs, employer breakfasts and business recognition events designed to engage employers.

**Strategy 7: Explore and expand strategies to serve and support the older worker with disabilities. Goal 5 and 9.**

In FFY 17 the proportion of DVR participants over 55 increased to 18%, an increase of 5% over the past four years. In response, DVR has created a Mature Worker Program Director. This position will work with the DVR management team to explore strategies to engage and serve mature workers. This may include:

- Expanding partnerships with community agencies already serving the older worker such as Vermont Associates.
- Training employment staff such as the Business Account Managers and Employment Consultants on how to represent older workers.
- Effective use of Assistive Technology to assist and encourage aging workers to remain in the workforce.

**Strategy 8: Explore strategies to assist DVR consumers retain and advance in employment. Goal 1, 5, and 8.**

DVR recognizes one of the goals of WIOA is to help consumers retain employment and develop career pathways to higher wage employment. The DVR management team had a two-day retreat to consider strategies to achieve this goal. One of those approaches is to engage consumers post closure to determine if they could benefit from additional services to help them advance in their current employment. This might include:

- Exploring the use of post-employment services to support DVR consumers advancing in their current employment or accessing a new higher wage job.
- Exploring outreach to closed cases to determine if individuals could benefit from re-engagement with DVR.

**Strategy 9: DVR will continue to seek funding partnerships with state agencies and community agencies to expand access to supported employment for individuals with the most severe disabilities, who are not currently eligible for long term support through existing systems. Goal 10.**

DVR will continue to seek opportunities to expand supported employment access to individuals through the following strategies:

- Partnerships with other state and community agencies to fund long term supports.
- Innovative use of existing long term services to support employment.
- Development of natural support models.

**Strategy 10: DVR will partner with DMH to promote the Individual Placement and Support (IPS) model within the JOBS supported employment program. Goal 11.**

The IPS model is an evidence-based approach to providing supported employment services for adults with psychiatric disabilities. There is increasing evidence this approach is effective across populations including youth with severe emotional disturbance. DVR and DMH plan to support the implementation of IPS within the JOBS supported employment programs.

**(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.**

The State Assistive Technology Program is managed within the DVR program. The AT Project Director sits on the senior management team of the DVR program to make sure AT services are well integrated into VR services statewide.

DVR provides VR funds to the AT Project through a contract to provide AT assessment and consultation services for VR consumers statewide. These contract funds support three AT Specialists located around the state. In addition, DVR contracts with the AT project to provide two AT coaches to work specifically with youth.

DVR has established a set aside to fund higher cost AT equipment purchases. The AT staff provide guidance to VR counselors around the selection and purchase of AT equipment.

**(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.**

Most of the minorities living in VT reside within Chittenden County, served by the Burlington district office. In particular, Burlington has a high proportion of refugees and new Americans. There are several organizations within Burlington that serve individuals who are minorities and/or refugees. The Burlington VR office has a well-established relationship with the Vermont Refugee Resettlement program and the Association of Africans Living in Vermont.

**(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).**

Part of DVR's overall strategic plan, as noted in Section 1, is to continue implementing highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Vermont DVR has developed a comprehensive strategy to implement Pre-ETS in the state. Implementation started in the spring of 2015, and now Pre-ETS are fully operationalized. The following are the primary activities.

- A. DVR has implemented an in school Transition Counselor model providing PETS services. DVR has reassigned 20% of the programs VR counseling capacity (13.5 FTEs) to work exclusively with students. This provides coverage to all 60 supervisory unions and high schools in the state.
- B. DVR has worked with its primary CRP, VABIR, to implement the Youth Employment Specialist (YES) model. A full time YES will be paired with each in school VR counselor to provide a range of PETS services including the development of real work based learning experiences.
- C. DVR has implemented self-advocacy services for students through a contract agreement the Vermont Center for Independent Living (VCIL).

DVR has been successful in establishing a high quality Pre-ETS program accessible to students statewide. In addition, DVR will use the Linking Learning to Careers (LLC) project funded through the RSA Work Based Learning demonstration, to explore innovative new practices. The LLC project is an experimental design demonstration that will test the following innovations:

- The provision of Career Consultation services
- Graduated work based learning experiences including competitive employment
- Dual enrollment in post-secondary programs for high school students
- Youth assistive technology services
- Assistance with transportation

We believe the LLC demonstration will provide rich information for Vermont and other states around how to provide Pre-ETS services.

**(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.**

A major challenge for the Community Rehabilitation and supported employment programs is high staff turnover and staff training. To help address this issue DVR has partnered with Community College of Vermont to create an online Community Employment Specialist certification. The program meets the requirements for ACRE certification. The program was fully implemented in FFY 2017, and has been well accepted by provider agencies from supported employment programs and other CRPs. Staff appreciate the ability to get an ACRE certification.

**(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.**

As noted in Section 1, one of DVR's strategies is to implement a portfolio of projects designed to realign staff practices, services and assignment of resources to meet the WIOA.



DVR has identified a portfolio of twelve domains the Division will focus on to maximize DVR outcomes under the WIOA Common Performance Measures. These strategy areas of focus will be developed into projects during Program Year 2019. The areas of focus are:

- DVR Allocation of resources reflects the program qualitative measures.
- Every step of the rehabilitation process will message and support the DVR commitment to careers.
- DVR casework practices will support serving consumers more than once on their journey. DVR will have a system to reach out to closed cases will be in place. DVR consumers will be encouraged to have a short term and long term vocational goal.
- DVR Counselors will provide long term aspirational career counseling. All staff will be trained to support long term career goals.
- Motivational Interviewing (MI) coaches will facilitate coaching circles that support career counseling using MI strategies.
- All DVR staff are trained to do vocational assessments and use assessments as a career planning tool.
- A continuum of Progressive Education (parallel to Progressive Employment) will be developed and implemented.
- An education and training matrix will be done in each district, including a gap analysis.
- All staff will be familiar with education and training providers in their community and what career pathways they offer as well as stackable credentials. Counselors will be able to speak to customers, based on assessments, about possible career paths.
- BAMs understand the career paths in the businesses they serve.
- AWARE will support the Careers Initiative.
- A new dashboard will be created that reflects the Common Performance Measures – using “leading” measures.

**(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.**

As noted in this section, one of DVR’s strategies is to coordinate efforts with the Agency of Education (AOE) and the Department of Labor (VDOL), to ensure individuals with disabilities have access to other components of the workforce system.

As noted in the Unified Section of the plan, DVR will be working closely with VDOL and AOE to ensure DVR consumers have access to all the workforce development opportunities available in their communities. DVR will be implementing a number of strategies to make this happen including the following:

- The development of joint training programs in high demand and high wage sectors
- Developing systems to promote co—enrollment across programs to support consumer employment goals
- Actual or virtual co—location of DVR and VDOL staff D. Cross training of VDOL, DVR and AOE staff

**(8) How strategies will be used to do the following:**

**A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

As noted in Section 1, each strategy is linked back to at least one goal and priority established by VR and the SRC, consistent with the Needs Assessment.

**B. Support innovation and expansion activities;**

The strategies for innovation and expansion have been laid out in Section I.

**C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

As noted in Section 1, one of DVR's strategies is to continue to seek funding partnerships with state agencies to expand access to supported employment for individuals with the most severe disabilities, who are not currently eligible for long term support through existing systems.

DVR will continue to seek opportunities to expand supported employment access to individuals through the following strategies:

- Partnerships with other state and community agencies to fund long term supports
- Innovative use of existing long-term services to support employment
- Development of natural support models

**(p) Evaluation and Reports of Progress” VR and Supported Employment Goals.**

**(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined Plan for the most recently completed program year were achieved. The evaluation must:**

FFY 2017 Goals and Priorities as outlined in the state plan:

*DVR will implement highly effective Pre—Employment Transition Services (PETS) for students statewide.*

FFY 2017 Measures:

- a. The percentage of high schools statewide that have at least one student actively participating in PETS through DVR.
- b. The percentage of all potentially eligible students statewide who are participating in PETS through DVR.

FFY 2017 Targets:

- a. 90% of high schools statewide will have at least one student participating in PETS through DVR.

Program Year 2017 results: 100% of the public high schools in Vermont have made referrals to DVR for Pre-ETS services.

- b. DVR has just started to implement PETS in a comprehensive and strategic manner in FFY 16. We intend to use FFY 16 and FFY 17 to establish baseline data on the percentage of the total potentially eligible population participating in PETS.

Program Year 2017 results: During the 2016/17 school year 1,019 students with disabilities were enrolled in Pre-ETS and/or VR services out of a potentially eligible population of 5,390. This means 18.9% of potentially eligible students were receiving Pre-ETS and/or VR services during the school year.

DVR believes that our comprehensive strategic approach to implementing Pre-ETS statewide has contributed to this success. In particular, the designation of 13.5 VR Transition Counselors and 13.5 contracted Youth Employment Specialists. This allowed DVR to have a presence in every school with a single point of contact.

Factors that continue to impede implementation include:

- Lack of engagement from education staff in some high schools
- The challenges involved in serving the most rural and remote schools

***DVR will align services to support consumers in achieving the WIOA Common Performance Outcomes Measures.***

FFY 2017 Measures:

- a. Employment retention six months and twelve months post closure
- b. Median earnings six months post closure
- c. Credential attainment rate
- d. Measurable skills gains
- e. Employer engagement

FFY 2017 Targets: The targets are entered in the Common Performance Measures section of the unified plan.

Program Year 2017 Results: 2017 is a benchmark year for data collection under the Common Performance Measures.

***In addition to the Common Performance Measures, DVR will continue to assist more Vermonters with a disability achieve an employment outcome.***

FY 2017 Measure: The number of individuals who achieve an employment outcome (status 26).

FY 2017 Target: More individuals will achieve an employment outcome in FY 2017 than did in FY 2016

FFY 17 Results: In FFY 2017 1,287 DVR consumers achieved an employment outcome. This is compared to 1,574 consumers who achieved an employment outcome in FFY 16.

DVR believes there are two major factors that impeded the program achieving this goal. First, the loss of re-allotment funds dramatically decreased staff and case service resources. For example, DVR had to reassign or not fill ten DVR counselor positions. This has clearly had an impact on outcomes. Secondly, the shift of resources to Pre-ETS has clearly affected employment outcomes. While DVR supports the

goal of Pre-ETS, there was no way to manage the re-assignment of 15% of federal funds to Pre-ETS without a drop in outcomes.

***DVR will effectively serve employers through Creative Workforce Solutions (CWS).***

FY 2017 Measure: Employer engagement with DVR as tracked through the CWS Salesforce account management system.

FFY 2017 Target: DVR will maintain active relationships with 2,500 employers statewide during the fiscal year.

FFY 17 Results: In FFY 2017, DVR had 2,013 active relationships with employers statewide.

Strategies that contributed to the achievement of this goal included:

- The maintenance of the Business Account Manager (BAM) Capacity statewide. Despite loss of re-allotment, DVR has maintained 10 BAM positions statewide, a reduction of two positions. Two BAMs are covering two of the twelve DVR districts.
- DVR has invested in the training and development of the BAM staff to improve their effectiveness.

Factors that impeded the implementation of the goal:

- The loss of two FTE BAM staff naturally had an impact on the employer outreach overall numbers.

***Consumer satisfaction with DVR services will be maintained or increase.***

FFY 2017 Measure: Bi-annual consumer satisfaction survey.

2017 Target: DVR will achieve an 86% or better overall consumer satisfaction rating. Consumers reported an 83% overall satisfaction rating in the most recent survey (2013).

FFY 16 Results: In the spring of 2016, DVR repeated the consumer satisfaction survey conducted by an independent contractor. 87% of DVR consumers reported they were satisfied or very satisfied with DVR services.

Strategies that contributed to the achievement of this goal:

After the 2013 satisfaction survey results became available, DVR managers met with the survey contractor to look at the underlying data. We found two underlying issues:

- Differences in expectations between DVR consumers and what the DVR program could actually provide.
- Consumer concerns about staff response times to phone calls and E mails.

In response to the above DVR redesigned its approach to orientation to set clearer expectations about the DVR program. DVR also implemented new expectations about response times for consumer contacts.

***DVR will implement the Alliance Enterprises AWARE electronic case management system to support staff in providing high quality VR services.***

FFY 2017 Measure: Staff satisfaction with the AWARE Implementation

FFY 2017 Targets:

- a. More than 70% of staff will report they are satisfied or very satisfied with the implementation of the AWARE case management system three months post operationalization.
- b. More than 90% of Staff will report they are satisfied or very satisfied with the AWARE system one year after implementation (twelve months post operationalization).

FFY 2017 Results: DVR went live with AWARE in September 2017. Based on field feedback, the system has been overwhelmingly accepted by frontline staff. Staff are very happy to finally have a modern case management system. DVR is currently conducting a survey of all staff. We expect the results to be available in April.

***DVR staff will be satisfied with their jobs and have the training, tools and support they need to be effective.***

FFY 2017 Measure: Bi-annual Staff Survey

- a. Overall staff satisfaction
- b. Staff response to the question “Do you have the information you need to do your job?”
- c. Staff response to the question “Do you have adequate training to do your job?”

FFY 2017 Targets:

- a. More than 90% of staff will report they are satisfied or very satisfied with their jobs.
- b. More than 85% of staff will report they have the information they need to do their jobs.
- c. More than 80% of staff will report they had adequate training to do their jobs.

FFY 2017 Results: DVR did not conduct a staff satisfaction survey in 2017. This was because DVR was going through a major restructuring and downsizing. DVR determined it was inappropriate to conduct a satisfaction survey during such a period of change and uncertainty.

***DVR will continue to seek funding for services for the following underserved populations in the state:***

- a. Individuals with measured IQs between 70 and 80
- b. Individuals with TBI
- c. Individuals with psychiatric disabilities
- d. Individuals with other significant disabilities who require case management services
- e. Individuals exiting the correctional system
- f. Individuals with alcohol/substance abuse dependence/abuse disorders (AODA)
- g. Individuals with disabilities who are veterans
- h. Individuals with disabilities who are not primary English speakers
- i. Individuals age 65 and older

FFY 2017 Measures: DVR will track and report the results of specific initiatives related to these populations.

FFY 2017 Targets: None

FFY 2017 Results: In FFY 2016 DVR implemented one pilots to serve underserved populations. These were as follows:

Three pilots with peer run “Recovery Centers” serving adults with substance abuse disorders. The goal was to embed employment staff in the centers. Because of the loss of re-allotment funds DVR had to

discontinue the pilot. However, the Vermont Office of Alcohol and Drug Abuse Programs has agreed to step in and fund this service.

**(A) Identify the strategies that contributed to the achievement of the goals.**

This information is included in Section 1 where applicable.

**(B) Describe the factors that impeded the achievement of the goals and priorities.**

This information is included in Section 1 where applicable.

**(4) An evaluation of the extent to which the VR program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

***DVR will improve the outcomes for supported employment programs serving adults with developmental disabilities. This includes students served under Pre-Employment Transition Services.***

2017 Measures:

- a. Total number of consumers achieving a successful employment outcome (VR 26 closure).
- b. Total number of people employed within the Developmental Services Program.
- c. Total number of students receiving Pre-ETS services through supported employment.

FFY 2017 Targets

- a. Total successful employment outcomes: 250
- b. Total number of people employed: 1,150
- c. Total number served through Pre-ETS: Baseline to be established in FFY 2016 and FFY 2017.

FFY 2017 Results:

Total successful employment outcomes: The implementation of AWARE in FFY 2017 has interrupted DVR capacity to report on these measures. The data crosses the legacy system and AWARE making it very difficult to generate these data accurately. DVR expects to be able to generate these reports going forward in the AWARE system.

Total number of people employed: 1,256 individuals with developmental disabilities were employed.

In FFY 17, DVR ended Pre-ETS funding for developmental services supported employment programs because of the loss of re-allotment funding.

***DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Programs.***

The implementation of AWARE in FFY 2017 has interrupted DVR capacity to report on these measures. The data crosses the legacy system and AWARE making it very difficult to generate these data accurately. DVR expects to be able to generate these reports going forward in the AWARE system.

**(A) Identify the strategies that contributed to the achievement of the goals.**

DVR has a long history of collaboration with the State Division of Developmental Services and the State Department of Mental Health and the community agencies that provide supported employment services. This includes joint monitoring of programs, sponsoring of joint trainings and monthly meetings with leadership. This strong partnership has allowed Vermont to develop a shared vision of supported employment services.

**(B) Describe the factors that impeded the achievement of the goals and priorities.**

The loss of re-allotment funding has required DVR to reduce funding to the developmental services supported employment programs by about 30% and the JOBS supported employment programs by about 40%. Such significant reductions have had an impact on the programs capacity.

**(q) Quality, Scope, and Extent of Supported Employment Services.**

**(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.**

**Individuals with Developmental Disabilities**

DVR works closely with the Developmental Disabilities Services Division (DDSD) to provide supported employment services and DVR funds are viewed, along with Medicaid funds, as an integral part of the overall employment budget for individuals with developmental disabilities. This funding braids DVR funding with individual Medicaid Waiver funds to create a seamless structure of upfront and ongoing support. DVR funds are specifically allocated to provide assessment, training, and placement services until closure, with Medicaid Waiver funds providing the necessary long term follow up.

DVR and DDSD only support individual integrated competitive supported employment. The State does not support any sheltered work or congregate work settings. The most recent employment rate data for individuals with developmental disabilities (SFY16) showed a 48% employment rate for working age adults in the DDSD system.

DVR and DDSD have no sheltered employment workshops since Vermont closed its last workshop for individuals with developmental disabilities in 2002. That same year, Vermont was ranked number 1 in the nation in the number of people with developmental disabilities who received supported employment to work per 100,000 of the state population<sup>1</sup>. In the past two years, the numbers of individuals with developmental disabilities employed in competitive jobs have continued to increase.

---

<sup>1</sup> The State of the States in Developmental Disabilities: 2002 Study Summary, Coleman Institute for Cognitive Disabilities & Department of Psychiatry, University of Colorado, January 2004.

## **Adults with Significant Mental Illness**

DVR has historically worked closely with DMH to support the integration of employment into the broad array of clinical mental health services available to individuals with significant mental health issues. Similar to its relationship with DDS, DVR funding was braided with the DMH Community Rehabilitation and Treatment (CRT) Medicaid case rate to provide a seamless structure of upfront and ongoing support.

Up until SFY 2016, DVR funds have been specifically allocated to provide assessment, training, and placement services until closure, with the CRT Medicaid case rate funds providing the necessary long term follow up. Starting in SFY 16, DVR decided to reallocate the \$700,000 in Title 110 funds committed to adult mental health to the JOBS program. This decision was made to enable DVR to come into compliance with the Pre-Employment Transition Services (Pre-ETS) requirement. In order to meet the 15% Pre-ETS expenditure target, DVR had to reassign funds from adult services to services for students and youth. This was a very difficult decision for DVR and we are greatly saddened by the impact on supported employment services for adults with mental illness.

While DVR no longer has a formal contractual program with the CRT programs to deliver supported employment services, DVR continues to partner with CRT programs at the local level. Many CRT programs have sustained their supported employment services despite the loss of VR funding. Local VR offices continue to provide services for CRT consumers that supplement their Medicaid funded services.

DVR and DMH continue to work together at the state level, to support evidence based supported employment. Vermont was the first state to pilot a Johnson and Johnson Dartmouth initiative, now in 13 states, which continues to demonstrate that adherence to the principles of evidence based supported employment is key to increasing employment rates.

## **Youth with Emotional and Behavioral Disturbances**

The JOBS Program is an innovative supported employment and intensive case management service for youth with emotional and behavioral disturbances (EBD) that uses work as a means to reach this challenging population. As a result of a unique partnership between the Department of Mental Health's Child, Adolescent and Family Unit (CAFU), the Department for Children and Families, the Department of Corrections, the Division of Vocational Rehabilitation, and contract agencies, the JOBS Program is operational in twelve (12) sites across the state. The JOBS Program is funded through a combination of Medicaid Global Commitment funds and a VR grant funds.

JOBS involves employers and the business community in meeting the needs of youth through intensive job development, placement, and on and off site training support. JOBS differs from other traditional employment models by providing intensive case management services to assist young people in meeting other areas of need in their lives, e.g., dealing with legal issues, homelessness, drug/alcohol abuse, transportation and probation and parole. Within this model, DVR funds are used to provide the employment focus and upfront employment assessment, training, and placement services. The case management and ongoing support is provided through state general funds (contributed by the different



state departments noted above) which are matched to Medicaid through a fee for service arrangement with DMH.

### **Individuals with Traumatic Brain Injury**

DVR also works with the Developmental Disabilities Services Division (DDSD) to provide seamless employment support to individuals with Traumatic Brain Injury. Similar to the collaboration that serves individuals with developmental disabilities, the DVR funds are used for the up—front assessment, training, and placement services, while individual Medicaid waiver funds are used to provide the ongoing support.

#### **(2) The timing of transition to extended services.**

Described in Section 1

#### **(r) Certifications.**

##### **Name of designated State agency or designated State unit, as appropriate:**

Vermont Agency of Human Services

##### **Name of designated State agency:**

Vermont Agency of Human Services

##### **Full Name of Authorized Representative:**

Al Gobeille

##### **Title of Authorized Representative:**

Secretary

##### **States must provide written and signed certifications that:**

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act.\*\*

Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary

of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan.

Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan\*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan.\*\*

Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement.

Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

Yes

7. The Authorized Representative listed above has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement.

Yes

8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services.

Yes

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Yes

### **Additional Comments on the Certifications from the State**

1. Certification Regarding Lobbying- Vocational Rehabilitation

Certification for Contracts, Grants, Loans, and Cooperative Agreements the undersigned certifies, to the best of his or her knowledge and belief, that:

- A. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- B. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions
- C. The undersigned shall require that the language of this certification be included in the award documents for all sub awards at all tiers (including subcontracts, sub grants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### **Applicant's Organization:**

Agency of Human Services, Division of Vocational Rehabilitation

#### **Full Name of Authorized Representative:**

Al Gobeille

#### **Title of Authorized Representative:**

Secretary

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to [MAT\\_OCTAE@ed.gov](mailto:MAT_OCTAE@ed.gov)

## 2. Certification Regarding Lobbying- Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

- A. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- B. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- C. The undersigned shall require that the language of this certification be included in the award documents for all sub awards at all tiers (including subcontracts, sub grants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Applicant's Organization:**

Agency of Human Services Division of Vocational Rehabilitation

**Full Name of Authorized Representative:**

Al Gobeille

**Title of Authorized Representative:**

Secretary

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

## Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: The State Plan must provide assurances that:

1. Public Comment on Policies and Procedures:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

- A. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
- B. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council
- C. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
- D. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
- E. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
- F. The designated State agency allows for the local administration of VR funds  
No
- G. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. The designated State agency allows for the shared funding and administration of joint programs:  
No
- H. state wideness and waivers of state wideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of state wideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan.

No

- I. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

No

- J. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
- K. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- L. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- M. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- N. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

#### 4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

- A. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
- B. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
- C. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?
- D. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.  
Agency will provide the full range of services described above
- E. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
- F. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- G. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- H. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.
- I. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs
- J. with respect to students with disabilities, the State, has developed and will implement strategies to address the needs identified in the assessments; and strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with

disabilities on a statewide basis; and has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

- A. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act
- B. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- C. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

- A. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.
- B. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

- A. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- B. The designated State agency assures that:  
  
the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act

an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

---

#### **Certification 1 Footnotes**

\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

#### **Certification 2 Footnotes**

\* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

#### **Certification 3 Footnotes**

\* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes.