

# **State Plan for the State Vocational Rehabilitation Services Program and State Plan Supplement for the State Supported Employment Services Program Rhode Island Office of Rehabilitation Services State Plan for Fiscal Year 2015 (submitted FY 2014)**

## **Preprint - Section 1: State Certifications**

1.1 The *Office of Rehabilitation Services* is authorized to submit this State Plan under Title I of the Rehabilitation Act of 1973, as amended [1] and its supplement under Title VI, Part B, of the Rehabilitation Act [2].

1.2 As a condition for the receipt of federal funds under Title I, Part B, of the Rehabilitation Act for the provision of vocational rehabilitation services, the *Department of Human Services* [3] agrees to operate and administer the State Vocational Rehabilitation Services Program in accordance with the provisions of this State Plan [4], the Rehabilitation Act, and all applicable regulations [5], policies and procedures established by the secretary. Funds made available under Section 111 of the Rehabilitation Act are used solely for the provision of vocational rehabilitation services under Title I of the Rehabilitation Act and the administration of the State Plan for the vocational rehabilitation services program.

1.3 As a condition for the receipt of federal funds under Title VI, Part B, 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 provisions of the supplement to this State Plan [6], the Rehabilitation Act and all applicable regulations [7], policies and procedures established by the secretary. Funds made available under Title

VI, Part B, are used solely for the provision of supported employment services and the administration of the supplement to the Title I State Plan. **Yes**

1.4 The designated state agency and/or the designated state unit has the authority under state law to perform the functions of the state regarding this State Plan and its supplement. **Yes**

1.5 The state legally may carry out each provision of the State Plan and its supplement. **Yes**

1.6 All provisions of the State Plan and its supplement are consistent with state law. **Yes**

1.7 The (enter title of state officer below) **Yes**

**Associate Director Department of Human Services/Office of Rehabilitation Service**

... has the authority under state law to receive, hold and disburse federal funds made available under this State Plan and its supplement.

1.8 The (enter title of state officer below)... **Yes**

**Associate Director Department of Human Services/Office of Rehabilitation Service**

... has the authority to submit this State Plan for vocational rehabilitation services and the State Plan supplement for supported employment services.

1.9 The agency that submits this State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. **Yes**

State Plan Certified By

As the authorized signatory identified above, I hereby certify that I will sign, date and retain in the files of the designated state agency/designated state unit Section 1 of the Preprint, and separate Certification of Lobbying forms (Form ED-80-0013; available at <http://www.ed.gov/fund/grant/apply/appforms/ed80-013.pdf>) for both the vocational rehabilitation and supported employment programs.

Signed? **Yes**

Name of Signatory **Ronald Racine**

Title of Signatory **Acting Associate Director**

Date Signed (mm/dd/yyyy) **06/23/2014**

#### Assurances Certified By

At the request of RSA, the designated state agency and/or the designated state unit provide the following assurance(s), in addition to those contained within Section 2 through 8 below, in connection with the approval of the State Plan for FY **2015 No**

#### Section 1 Footnotes

[1] Public Law 93 112, as amended by Public Laws 93 516, 95 602, 98 221, 99 506, 100-630, 102-569, 103-073, and 105-220.

[2] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended.

[3] All references in this plan to "designated state agency" or to "the state agency" relate to the agency identified in this paragraph.

[4] No funds under Title I of the Rehabilitation Act may be awarded without an approved State Plan in accordance with Section 101(a) of the Rehabilitation Act and 34 CFR part 361.

[5] Applicable regulations include the Education Department General Administrative Regulations (EDGAR) in 34 CFR Parts 74, 76, 77, 79, 80, 81, 82, 85 and 86 and the State Vocational Rehabilitation Services Program regulations in 34 CFR Part 361.

[6] No funds under Title VI, Part B, of the Rehabilitation Act may be awarded without an approved supplement to the Title I State Plan in accordance with Section 625(a) of the Rehabilitation Act.

[7] Applicable regulations include the EDGAR citations in footnote 5, 34 CFR Part 361, and 34 CFR Part 363.

## CERTIFICATION REGARDING LOBBYING

Applicants must review the requirements for certification regarding lobbying included in the regulations cited below before completing this form. Applicants must sign this form to comply with the certification requirements under 34 CFR Part 82, "New Restrictions on Lobbying." This certification is a material representation of fact upon which the Department of Education relies when it makes a grant or enters into a cooperative agreement.

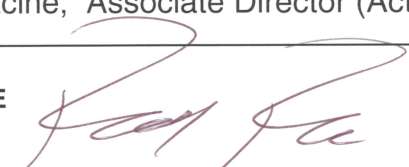
As required by Section 1352, Title 31 of the U.S. Code, and implemented at 34 CFR Part 82, for persons entering into a Federal contract, grant or cooperative agreement over \$100,000, as defined at 34 CFR Part 82, Sections 82.105 and 82.110, the applicant certifies that:

(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 any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant 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 grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;

(c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants and contracts under grants and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certification.

<b>NAME OF APPLICANT</b>	<b>PR/AWARD NUMBER AND / OR PROJECT NAME</b>
Department of Human Services Office of Rehabilitation Services	Vocational Rehabilitation Basic Support H126A070058
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	
Ronald Racine, Associate Director (Acting)	
<b>SIGNATURE</b>	<b>DATE</b>
	6/23/14

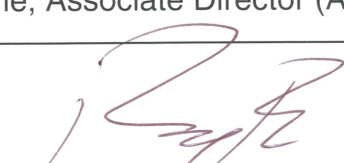
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- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants and contracts under grants and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certification.

<b>NAME OF APPLICANT</b>	<b>PR/AWARD NUMBER AND / OR PROJECT NAME</b>
Department of Human Services Office of Rehabilitation Services	Supported Employment Services Program H187A070059B
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	
Ronald Racine, Associate Director (Acting)	
<b>SIGNATURE</b>	<b>DATE</b>
	6/23/14

# **Preprint - Section 2: Public Comment on State Plan Policies and Procedures**

**2.1 Public participation requirements. (Section 101(a)(16)(A) of the Rehabilitation Act; 34 CFR 361.10(d), .20(a), (b), (d); and 363.11(g) (9))**

**(a) Conduct of public meetings.**

The designated state agency, prior to the adoption of any substantive policies or procedures governing the provision of vocational rehabilitation services under the State Plan and supported employment services under the supplement to the State Plan, including making any substantive amendments to the policies and procedures, conducts public meetings throughout the state to provide the public, including individuals with disabilities, an opportunity to comment on the policies or procedures.

**(b) Notice requirements.**

The designated state agency, prior to conducting the public meetings, provides appropriate and sufficient notice throughout the state of the meetings in accordance with state law governing public meetings or, in the absence of state law governing public meetings, procedures developed by the state agency in consultation with the State Rehabilitation Council, if the agency has a council.

**(c) Special consultation requirements.**

The state agency actively consults with the director of the Client Assistance Program, the State Rehabilitation Council, if the agency has a council and, as appropriate, Indian tribes, tribal organizations and native Hawaiian organizations on its policies and procedures governing the provision of vocational rehabilitation services under the State Plan and supported employment services under the supplement to the State Plan.

# Preprint - Section 3: Submission of the State Plan and its Supplement

## **3.1 Submission and revisions of the State Plan and its supplement. (Sections 101(a)(1), (23) and 625(a)(1) of the Rehabilitation Act; Section 501 of the Workforce Investment Act; 34 CFR 76.140; 361.10 (e), (f), and (g); and 363.10)**

(a) The state submits to the commissioner of the Rehabilitation Services Administration the State Plan and its supplement on the same date that the state submits either a State Plan under Section 112 of the Workforce Investment Act of 1998 or a state unified plan under Section 501 of that Rehabilitation Act.

(b) The state submits only those policies, procedures or descriptions required under this State Plan and its supplement that have not been previously submitted to and approved by the commissioner.

(c) The state submits to the commissioner, at such time and in such manner as the commissioner determines to be appropriate, reports containing annual updates of the information relating to the:

1. comprehensive system of personnel development;
2. assessments, estimates, goals and priorities, and reports of progress;
3. innovation and expansion activities; and
4. other updates of information required under Title I, Part B, or Title VI, Part B, of the Rehabilitation Act that are requested by the commissioner.

(d) The State Plan and its supplement are in effect subject to the submission of modifications the state determines to be necessary or the commissioner requires based on a change in state policy, a change in federal law, including regulations, an interpretation of the Rehabilitation Act by a federal court or the highest court of the state, or a finding by the commissioner of state noncompliance with the requirements of the Rehabilitation Act, 34 CFR 361 or 34 CFR 363.

## **3.2 Supported Employment State Plan supplement. (Sections 101(a)(22) and 625(a) of the Rehabilitation Act; 34 CFR 361.34 and 363.10)**

(a) The state has an acceptable plan for carrying out Part B, of Title VI of the Rehabilitation Act that provides for the use of funds under that part to supplement funds made available under Part B, of Title I of the Rehabilitation Act for the cost of services leading to supported employment.

(b) The Supported Employment State Plan, including any needed annual revisions, is submitted as a supplement to the State Plan.

# Preprint - Section 4: Administration of the State Plan

## 4.1 Designated state agency and designated state unit. (Section 101(a) (2) of the Rehabilitation Act; 34 CFR 361.13(a) and (b))

### (a) Designated state agency.

1. There is a state agency designated as the sole state agency to administer the State Plan or to supervise its administration in a political subdivision of the state by a sole local agency.
2. The designated state agency *is a state agency that is not primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities and includes a vocational rehabilitation unit as provided in paragraph (b) of this section (Option B was selected/Option A was not selected)*
3. In American Samoa, the designated state agency is the governor.

### (b) Designated state unit.

1. If the designated state agency is not primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities, in accordance with subparagraph 4.1(a)(2)(B) of this section, the state agency includes a vocational rehabilitation bureau, division or unit that:
  - A. is primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities and is responsible for the administration of the designated state agency's vocational rehabilitation program under the State Plan;
  - B. has a full-time director;
  - C. has a staff, at least 90 percent of whom are employed full-time on the rehabilitation work of the organizational unit; and
  - D. is located at an organizational level and has an organizational status within the designated state agency comparable to that of other major organizational units of the designated state agency.
2. The name of the designated state vocational rehabilitation unit is

### *Office of Rehabilitation Services*



**4.2 State independent commission or State Rehabilitation Council.  
(Sections 101(a)(21) and 105 of the Rehabilitation Act; 34 CFR 361.16  
and .17)**

The State Plan must contain one of the following assurances.

- (a) The designated state agency is an independent state commission that
1. is responsible under state law for operating or overseeing the operation of the vocational rehabilitation program in the state and is primarily concerned with the vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities in accordance with subparagraph 4.1(a)(2)(A) of this section.
  2. is consumer controlled by persons who:
    - A. are individuals with physical or mental impairments that substantially limit major life activities; and
    - B. represent individuals with a broad range of disabilities, unless the designated state unit under the direction of the commission is the state agency for individuals who are blind;
  3. includes family members, advocates or other representatives of individuals with mental impairments; and
  4. undertakes the functions set forth in Section 105(c)(4) of the Rehabilitation Act and 34 CFR 361.17(h)(4).

(b) The state has established a State Rehabilitation Council that meets the criteria set forth in Section 105 of the Rehabilitation Act, 34 CFR 361.17

(c) If the designated state unit has a State Rehabilitation Council, Attachment 4.2(c) provides a summary of the input provided by the council consistent with the provisions identified in subparagraph (b)(3) of this section; the response of the designated state unit to the input and recommendations; and, explanations for the rejection of any input or any recommendation.

***(Option B was selected)***

**4.3 Consultations regarding the administration of the State Plan.  
(Section 101(a)(16)(B) of the Rehabilitation Act; 34 CFR 361.21)**

The designated state agency takes into account, in connection with matters of general policy arising in the administration of the plan and its supplement, the views of:

- (a) individuals and groups of individuals who are recipients of vocational rehabilitation services or, as appropriate, the individuals' representatives;
- (b) personnel working in programs that provide vocational rehabilitation services to individuals with disabilities;
- (c) providers of vocational rehabilitation services to individuals with disabilities;
- (d) the director of the Client Assistance Program; and
- (e) the State Rehabilitation Council, if the state has a council.

**4.4 Nonfederal share. (Sections 7(14) and 101(a)(3) of the Rehabilitation Act; 34 CFR 80.24 and 361.60)**

The nonfederal share of the cost of carrying out this State Plan is 21.3 percent and is provided through the financial participation by the state or, if the state elects, by the state and local agencies.

**4.5 Local administration. (Sections 7(24) and 101(a)(2)(A) of the Rehabilitation Act; 34 CFR 361.5(b)(47) and .15)**

The State Plan provides for the administration of the plan by a local agency. **No**

If "Yes", the designated state agency:

- (a) ensures that each local agency is under the supervision of the designated state unit with the sole local agency, as that term is defined in Section 7(24) of the Rehabilitation Act and 34 CFR 361.5(b)(47), responsible for the administration of the vocational rehabilitation program within the political subdivision that it serves; and
- (b) develops methods that each local agency will use to administer the vocational rehabilitation program in accordance with the State Plan.

**4.6 Shared funding and administration of joint programs. (Section 101(a)(2)(A)(ii) of the Rehabilitation Act; 34 CFR 361.27)**

The State Plan provides for the state agency to share funding and administrative responsibility with another state agency or local public agency to carry out a joint program to provide services to individuals with disabilities. **No**

If "Yes", the designated state agency submits to the commissioner for approval a plan that describes its shared funding and administrative arrangement. The plan must include:

- (a) a description of the nature and scope of the joint program;
- (b) the services to be provided under the joint program;
- (c) the respective roles of each participating agency in the administration and provision of services; and
- (d) the share of the costs to be assumed by each agency.

**4.7 Statewideness and waivers of statewideness. (Section 101(a)(4) of the Rehabilitation Act; 34 CFR 361.25, .26, and .60(b)(3)(i) and (ii))**

This agency is *not* requesting a waiver of statewideness.

(a) Services provided under the State Plan are available in all political subdivisions of the state.

(b) The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:

1. nonfederal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;
2. services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and
3. state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in Attachment 4.7(b)(3) a waiver of the statewideness requirement in accordance with the following requirements:
  - A. identification of the types of services to be provided;
  - B. written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
  - C. written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
  - D. written assurance that all other State Plan requirements, including a state's order of selection, will apply to all services approved under the waiver.

(c) Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state

may be used as part of the nonfederal share without the state requesting a waiver of the statewideness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

**4.8 Cooperation, collaboration and coordination. (Sections 101(a)(11), (24)(B), and 625(b)(4) and (5) of the Rehabilitation Act; 34 CFR 361.22, .23, .24, and .31, and 363.11(e))**

**(a) Cooperative agreements with other components of statewide work force investment system.**

The designated state agency or the designated state unit has cooperative agreements with other entities that are components of the statewide work force investment system and replicates those agreements at the local level between individual offices of the designated state unit and local entities carrying out the One-Stop service delivery system or other activities through the statewide work force investment system.

**(b) Cooperation and coordination with other agencies and entities.**

Attachment 4.8(b) (1)-(4) describes the designated state agency's:

1. cooperation with and use of the services and facilities of the federal, state, and local agencies and programs, including programs carried out by the undersecretary for Rural Development of the United States Department of Agriculture and state use contracting programs, to the extent that those agencies and programs are not carrying out activities through the statewide work force investment system;
2. coordination, in accordance with the requirements of paragraph 4.8(c) of this section, with education officials to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services;
3. establishment of cooperative agreements with private nonprofit vocational rehabilitation service providers, in accordance with the requirements of paragraph 5.10(b) of the State Plan; and,
4. efforts to identify and make arrangements, including entering into cooperative agreements, with other state agencies and entities with respect to the provision of supported employment and extended services for individuals with the most significant disabilities, in accordance with the requirements of subsection 6.5 of the supplement to this State Plan.

**(c) Coordination with education officials.**

1. Attachment 4.8(b)(2) describes the plans, policies and procedures for coordination between the designated state agency and education officials responsible for the public education of students with disabilities that are designed to facilitate the transition of the students who are individuals with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services under the responsibility of the designated state agency.
2. The State Plan description must:
  - A. provide for the development and approval of an individualized plan for employment in accordance with 34 CFR 361.45 as early as possible during the transition planning process but, at the latest, before each student determined to be eligible for vocational rehabilitation services leaves the school setting or if the designated state unit is operating on an order of selection before each eligible student able to be served under the order leaves the school setting; and
  - B. include information on a formal interagency agreement with the state educational agency that, at a minimum, provides for:
    - i. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to postschool activities, including vocational rehabilitation services;
    - ii. transition planning by personnel of the designated state agency and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under Section 614(d) of the Individuals with Disabilities Education Act;
    - iii. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services; and
    - iv. procedures for outreach to students with disabilities as early as possible during the transition planning process and identification of students with disabilities who need transition services.

**(d) Coordination with statewide independent living council and independent living centers.**

The designated state unit, the Statewide Independent Living Council established under Section 705 of the Rehabilitation Act and 34 CFR 364, and the independent living centers described in Part C of Title VII of the Rehabilitation Act and 34 CFR 366 have developed working relationships and coordinate their activities.

**(e) Cooperative agreement with recipients of grants for services to American Indians.**

1. There is in the state a recipient(s) of a grant under Part C of Title I of the Rehabilitation Act for the provision of vocational rehabilitation services for American Indians who are individuals with disabilities residing on or near federal and state reservations. **No**
2. If "Yes", the designated state agency has entered into a formal cooperative agreement that meets the following requirements with each grant recipient in the state that receives funds under Part C of Title I of the Rehabilitation Act:
  - A. strategies for interagency referral and information sharing that will assist in eligibility determinations and the development of individualized plans for employment;
  - B. procedures for ensuring that American Indians who are individuals with disabilities and are living near a reservation or tribal service area are provided vocational rehabilitation services; and
  - C. provisions for sharing resources in cooperative studies and assessments, joint training activities, and other collaborative activities designed to improve the provision of services to American Indians who are individuals with disabilities.

**4.9 Methods of administration. (Section 101(a)(6) of the Rehabilitation Act; 34 CFR 361.12, .19 and .51(a) and (b))**

**(a) In general.**

The state agency employs methods of administration, including procedures to ensure accurate data collection and financial accountability, found by the commissioner to be necessary for the proper and efficient administration of the plan and for carrying out all the functions for which the state is responsible under the plan and 34 CFR 361.

**(b) Employment of individuals with disabilities.**

The designated state agency and entities carrying out community rehabilitation programs in the state, who are in receipt of assistance under Part B, of Title I of the Rehabilitation Act and this State Plan, take affirmative action to employ and advance in employment qualified individuals with disabilities covered under and on the same terms and conditions as set forth in Section 503 of the Rehabilitation Act.

**(c) Facilities.**

Any facility used in connection with the delivery of services assisted under this State Plan meets program accessibility requirements consistent with the provisions, as applicable, of the Architectural Barriers Rehabilitation Act of 1968, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act of 1990 and the regulations implementing these laws.

**4.10 Comprehensive system of personnel development. (Section 101(a)(7) of the Rehabilitation Act; 34 CFR 361.18)**

Attachment 4.10 describes the designated state agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified state rehabilitation professional and paraprofessional personnel for the designated state unit. The description includes the following:

**(a) Data system on personnel and personnel development.**

Development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs and personnel development with respect to:

1. Qualified personnel needs.
  - A. The number of personnel who are employed by the state agency in the provision of vocational rehabilitation services in relation to the number of individuals served, broken down by personnel category;
  - B. The number of personnel currently needed by the state agency to provide vocational rehabilitation services, broken down by personnel category; and
  - C. Projections of the number of personnel, broken down by personnel category, who will be needed by the state agency to provide vocational rehabilitation services in the state in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.
2. Personnel development.
  - A. A list of the institutions of higher education in the state that are preparing vocational rehabilitation professionals, by type of program;
  - B. The number of students enrolled at each of those institutions, broken down by type of program; and

- C. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

**(b) Plan for recruitment, preparation and retention of qualified personnel.**

Development, updating on an annual basis, and implementation of a plan to address the current and projected needs for qualified personnel based on the data collection and analysis system described in paragraph (a) of this subsection and that provides for the coordination and facilitation of efforts between the designated state unit and institutions of higher education and professional associations to recruit, prepare and retain personnel who are qualified in accordance with paragraph (c) of this subsection, including personnel from minority backgrounds and personnel who are individuals with disabilities.

**(c) Personnel standards.**

Policies and procedures for the establishment and maintenance of personnel standards to ensure that designated state unit professional and paraprofessional personnel are appropriately and adequately prepared and trained, including:

1. standards that are consistent with any national- or state-approved or recognized certification, licensing, registration, or, in the absence of these requirements, other comparable requirements (including state personnel requirements) that apply to the profession or discipline in which such personnel are providing vocational rehabilitation services.
2. To the extent that existing standards are not based on the highest requirements in the state applicable to a particular profession or discipline, the steps the state is currently taking and the steps the state plans to take in accordance with the written plan to retrain or hire personnel within the designated state unit to meet standards that are based on the highest requirements in the state, including measures to notify designated state unit personnel, the institutions of higher education identified in subparagraph (a)(2), and other public agencies of these steps and the time lines for taking each step.
3. The written plan required by subparagraph (c)(2) describes the following:
  - A. specific strategies for retraining, recruiting and hiring personnel;
  - B. the specific time period by which all state unit personnel will meet the standards required by subparagraph (c)(1);



- C. procedures for evaluating the designated state unit's progress in hiring or retraining personnel to meet applicable personnel standards within the established time period; and
- D. the identification of initial minimum qualifications that the designated state unit will require of newly hired personnel when the state unit is unable to hire new personnel who meet the established personnel standards and the identification of a plan for training such individuals to meet the applicable standards within the time period established for all state unit personnel to meet the established personnel standards.

**(d) Staff development.**

Policies, procedures and activities to ensure that all personnel employed by the designated state unit receive appropriate and adequate training. The narrative describes the following:

1. A system of staff development for professionals and paraprofessionals within the designated state unit, particularly with respect to assessment, vocational counseling, job placement and rehabilitation technology.
2. Procedures for the acquisition and dissemination to designated state unit professionals and paraprofessionals significant knowledge from research and other sources.

**(e) Personnel to address individual communication needs.**

Availability of personnel within the designated state unit or obtaining the services of other individuals who are able to communicate in the native language of applicants or eligible individuals who have limited English speaking ability or in appropriate modes of communication with applicants or eligible individuals.

**(f) Coordination of personnel development under the Individuals with Disabilities Education Act.**

Procedures and activities to coordinate the designated state unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

**4.11. Statewide assessment; annual estimates; annual state goals and priorities; strategies; and progress reports.**

(Sections 101(a)(15), 105(c)(2) and 625(b)(2) of the Rehabilitation Act; 34 CFR 361.17(h)(2), .29, and 363.11(b))

**(a) Comprehensive statewide assessment.**

1. Attachment 4.11(a) documents the results of a comprehensive, statewide assessment, jointly conducted every three years by the designated state unit and the State Rehabilitation Council (if the state has such a council). The assessment describes:
  - A. the rehabilitation needs of individuals with disabilities residing within the state, particularly the vocational rehabilitation services needs of:
    - i. individuals with the most significant disabilities, including their need for supported employment services;
    - ii. individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program carried out under this State Plan; and
    - iii. individuals with disabilities served through other components of the statewide work force investment system.
  - B. The need to establish, develop or improve community rehabilitation programs within the state.
2. For any year in which the state updates the assessments, the designated state unit submits to the commissioner a report containing information regarding updates to the assessments.

**(b) Annual estimates.**

Attachment 4.11(b) identifies on an annual basis state estimates of the:

1. number of individuals in the state who are eligible for services under the plan;
2. number of eligible individuals who will receive services provided with funds provided under Part B of Title I of the Rehabilitation Act and under Part B of Title VI of the Rehabilitation Act, including, if the designated state agency uses an order of selection in accordance with subparagraph 5.3(b)(2) of this State Plan, estimates of the number of individuals to be served under each priority category within the order; and
3. costs of the services described in subparagraph (b)(1), including, if the designated state agency uses an order of selection, the service costs for each priority category within the order.

**(c) Goals and priorities.**

1. Attachment 4.11(c)(1) identifies the goals and priorities of the state that are jointly developed or revised, as applicable, with and agreed to by the State Rehabilitation Council, if the agency has a council, in carrying out the vocational rehabilitation and supported employment programs.
2. The designated state agency submits to the commissioner a report containing information regarding any revisions in the goals and priorities for any year the state revises the goals and priorities.
3. Order of selection.  
If the state agency implements an order of selection, consistent with subparagraph 5.3(b)(2) of the State Plan, Attachment 4.11(c)(3):
  - A. shows the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services;
  - B. provides a justification for the order; and
  - C. identifies the service and outcome goals, and the time within which these goals may be achieved for individuals in each priority category within the order.
4. Goals and plans for distribution of Title VI, Part B, funds.  
Attachment 4.11(c)(4) specifies, consistent with subsection 6.4 of the State Plan supplement, the state's goals and priorities with respect to the distribution of funds received under Section 622 of the Rehabilitation Act for the provision of supported employment services.

**(d) Strategies.**

1. Attachment 4.11(d) describes the strategies, including:
  - A. the methods to be used to expand and improve services to individuals with disabilities, including how a broad range of assistive technology services and assistive technology devices will be provided to those individuals at each stage of the rehabilitation process and how those services and devices will be provided to individuals with disabilities on a statewide basis;
  - B. outreach procedures to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities in accordance with subsection 6.6 of the State Plan supplement, and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program;
  - C. as applicable, the plan of the state for establishing, developing or improving community rehabilitation programs;

- D. strategies to improve the performance of the state with respect to the evaluation standards and performance indicators established pursuant to Section 106 of the Rehabilitation Act; and
  - E. strategies for assisting other components of the statewide work force investment system in assisting individuals with disabilities.
2. Attachment 4.11 (d) describes how the designated state agency uses these strategies to:
    - A. address the needs identified in the assessment conducted under paragraph 4.11(a) and achieve the goals and priorities identified in the State Plan attachments under paragraph 4.11(c);
    - B. support the innovation and expansion activities identified in subparagraph 4.12(a)(1) and (2) of the plan; and
    - C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State Vocational Rehabilitation Services Program and State Supported Employment Services Program.

**(e) Evaluation and reports of progress.**

1. The designated state unit and the State Rehabilitation Council, if the state unit has a council, jointly submits to the commissioner an annual report on the results of an evaluation of the effectiveness of the vocational rehabilitation program and the progress made in improving the effectiveness of the program from the previous year.
2. Attachment 4.11(e)(2):
  - A. provides an evaluation of the extent to which the goals identified in Attachment 4.11(c)(1) and, if applicable, Attachment 4.11(c)(3) were achieved;
  - B. identifies the strategies that contributed to the achievement of the goals and priorities;
  - C. describes the factors that impeded their achievement, to the extent they were not achieved;
  - D. assesses the performance of the state on the standards and indicators established pursuant to Section 106 of the Rehabilitation Act; and
  - E. provides a report consistent with paragraph 4.12(c) of the plan on how the funds reserved for innovation and expansion activities were utilized in the preceding year.

**4.12 Innovation and expansion. (Section 101(a)(18) of the Rehabilitation Act; 34 CFR 361.35)**

**(a) The designated state agency reserves and uses a portion of the funds allotted to the state under Section 110 of the Rehabilitation Act for the:**

1. development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities, consistent with the findings of the statewide assessment identified in Attachment 4.11(a) and goals and priorities of the state identified in Attachments 4.11(c)(1) and, if applicable, Attachment 4.11(c)(3); and
2. support of the funding for the State Rehabilitation Council, if the state has such a council, consistent with the resource plan prepared under Section 105(d)(1) of the Rehabilitation Act and 34 CFR 361.17(i), and the funding of the Statewide Independent Living Council, consistent with the resource plan prepared under Section 705(e)(1) of the Rehabilitation Act and 34 CFR 364.21(i).

**(b) Attachment 4.11 (d) describes how the reserved funds identified in subparagraph 4.12(a)(1) and (2) will be utilized.**

**(c) Attachment 4.11(e)(2) describes how the reserved funds were utilized in the preceding year.**

**4.13 Reports. (Section 101(a)(10) of the Rehabilitation Act; 34 CFR 361.40)**

**(a) The designated state unit submits reports in the form and level of detail and at the time required by the commissioner regarding applicants for and eligible individuals receiving services under the State Plan.**

**(b) Information submitted in the reports provides a complete count, unless sampling techniques are used, of the applicants and eligible individuals in a manner that permits the greatest possible cross-classification of data and protects the confidentiality of the identity of each individual.**

# **Preprint - Section 5: Administration of the Provision of Vocational Rehabilitation Services**

## **5.1 Information and referral services. (Sections 101(a)(5)(D) and (20) of the Rehabilitation Act; 34 CFR 361.37)**

The designated state agency has implemented an information and referral system that is adequate to ensure that individuals with disabilities, including individuals who do not meet the agency's order of selection criteria for receiving vocational rehabilitation services if the agency is operating on an order of selection, are provided accurate vocational rehabilitation information and guidance, including counseling and referral for job placement, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and are referred to other appropriate federal and state programs, including other components of the statewide work force investment system in the state.

## **5.2 Residency. (Section 101(a)(12) of the Rehabilitation Act; 34 CFR 361.42(c)(1))**

The designated state unit imposes no duration of residence requirement as part of determining an individual's eligibility for vocational rehabilitation services or that excludes from services under the plan any individual who is present in the state.

## **5.3 Ability to serve all eligible individuals; order of selection for services. (Sections 12(d) and 101(a)(5) of the Rehabilitation Act; 34 CFR 361.36)**

(a) The designated state unit is able to provide the full range of services listed in Section 103(a) of the Rehabilitation Act and 34 CFR 361.48, as appropriate, to all eligible individuals with disabilities in the state who apply for services. *No*

(b) If No:

1. Individuals with the most significant disabilities, in accordance with criteria established by the state, are selected first for vocational rehabilitation services before other individuals with disabilities.
2. Attachment 4.11(c)(3):
  - A. shows the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services;
  - B. provides a justification for the order of selection; and

- C. identifies the state's service and outcome goals and the time within which these goals may be achieved for individuals in each priority category within the order.
3. Eligible individuals who do not meet the order of selection criteria have access to the services provided through the designated state unit's information and referral system established under Section 101(a)(20) of the Rehabilitation Act, 34 CFR 361.37, and subsection 5.1 of this State Plan.

**5.4 Availability of comparable services and benefits. (Sections 101(a)(8) and 103(a) of the Rehabilitation Act; 34 CFR 361.53)**

**(a) Prior to providing any vocational rehabilitation services, except those services identified in paragraph (b), to an eligible individual or to members of the individual's family, the state unit determines whether comparable services and benefits exist under any other program and whether those services and benefits are available to the individual.**

**(b) The following services are exempt from a determination of the availability of comparable services and benefits:**

1. assessment for determining eligibility and vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
2. counseling and guidance, including information and support services to assist an individual in exercising informed choice consistent with the provisions of Section 102(d) of the Rehabilitation Act;
3. referral and other services to secure needed services from other agencies, including other components of the statewide work force investment system, through agreements developed under Section 101(a)(11) of the Rehabilitation Act, if such services are not available under this State Plan;
4. job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
5. rehabilitation technology, including telecommunications, sensory and other technological aids and devices; and
6. post-employment services consisting of the services listed under subparagraphs (1) through (5) of this paragraph.

**(c) The requirements of paragraph (a) of this section do not apply if the determination of the availability of comparable services and benefits under any other program would interrupt or delay:**

1. progress of the individual toward achieving the employment outcome identified in the individualized plan for employment;
2. an immediate job placement; or
3. provision of vocational rehabilitation services to any individual who is determined to be at extreme medical risk, based on medical evidence provided by an appropriate qualified medical professional.

**(d) The governor in consultation with the designated state vocational rehabilitation agency and other appropriate agencies ensures that an interagency agreement or other mechanism for interagency coordination that meets the requirements of Section 101(a)(8)(B)(i)-(iv) of the Rehabilitation Act takes effect between the designated state unit and any appropriate public entity, including the state Medicaid program, a public institution of higher education, and a component of the statewide work force investment system to ensure the provision of the vocational rehabilitation services identified in Section 103(a) of the Rehabilitation Act and 34 CFR 361.48, other than the services identified in paragraph (b) of this section, that are included in the individualized plan for employment of an eligible individual, including the provision of those vocational rehabilitation services during the pendency of any dispute that may arise in the implementation of the interagency agreement or other mechanism for interagency coordination.**

#### **5.5 Individualized plan for employment. (Section 101(a)(9) of the Rehabilitation Act; 34 CFR 361.45 and .46)**

**(a) An individualized plan for employment meeting the requirements of Section 102(b) of the Rehabilitation Act and 34 CFR 361.45 and .46 is developed and implemented in a timely manner for each individual determined to be eligible for vocational rehabilitation services, except if the state has implemented an order of selection, and is developed and implemented for each individual to whom the designated state unit is able to provide vocational rehabilitation services.**

**(b) Services to an eligible individual are provided in accordance with the provisions of the individualized plan for employment.**

#### **5.6 Opportunity to make informed choices regarding the selection of services and providers. (Sections 101(a)(19) and 102(d) of the Rehabilitation Act; 34 CFR 361.52)**

Applicants and eligible individuals or, as appropriate, their representatives are provided information and support services to assist in exercising informed choice throughout the rehabilitation process, consistent with the provisions of Section 102(d) of the Rehabilitation Act and 34 CFR 361.52.



**5.7 Services to American Indians. (Section 101(a)(13) of the Rehabilitation Act; 34 CFR 361.30)**

The designated state unit provides vocational rehabilitation services to American Indians who are individuals with disabilities residing in the state to the same extent as the designated state agency provides such services to other significant populations of individuals with disabilities residing in the state.

**5.8 Annual review of individuals in extended employment or other employment under special certificate provisions of the fair labor standards act of 1938. (Section 101(a)(14) of the Rehabilitation Act; 34 CFR 361.55)**

**(a) The designated state unit conducts an annual review and reevaluation of the status of each individual with a disability served under this State Plan:**

1. who has achieved an employment outcome in which the individual is compensated in accordance with Section 14(c) of the Fair Labor Standards Act (29 U.S.C. 214(c)); or
2. whose record of services is closed while the individual is in extended employment on the basis that the individual is unable to achieve an employment outcome in an integrated setting or that the individual made an informed choice to remain in extended employment.

**(b) The designated state unit carries out the annual review and reevaluation for two years after the individual's record of services is closed (and thereafter if requested by the individual or, if appropriate, the individual's representative) to determine the interests, priorities and needs of the individual with respect to competitive employment or training for competitive employment.**

**(c) The designated state unit makes maximum efforts, including the identification and provision of vocational rehabilitation services, reasonable accommodations and other necessary support services, to assist the individuals described in paragraph (a) in engaging in competitive employment.**

**(d) The individual with a disability or, if appropriate, the individual's representative has input into the review and reevaluation and, through signed acknowledgement, attests that the review and reevaluation have been conducted.**

**5.9 Use of Title I funds for construction of facilities. (Sections 101(a)(17) and 103(b)(2)(A) of the Rehabilitation Act; 34 CFR 361.49(a)(1), .61 and .62(b))**

If the state elects to construct, under special circumstances, facilities for community rehabilitation programs, the following requirements are met:

**(a) The federal share of the cost of construction for facilities for a fiscal year does not exceed an amount equal to 10 percent of the state's allotment under Section 110 of the Rehabilitation Act for that fiscal year.**

**(b) The provisions of Section 306 of the Rehabilitation Act that were in effect prior to the enactment of the Rehabilitation Act Amendments of 1998 apply to such construction.**

**(c) There is compliance with the requirements in 34 CFR 361.62(b) that ensure the use of the construction authority will not reduce the efforts of the designated state agency in providing other vocational rehabilitation services other than the establishment of facilities for community rehabilitation programs.**

#### **5.10 Contracts and cooperative agreements. (Section 101(a)(24) of the Rehabilitation Act; 34 CFR 361.31 and .32)**

**(a) Contracts with for-profit organizations.**

The designated state agency has the authority to enter into contracts with for-profit organizations for the purpose of providing, as vocational rehabilitation services, on-the-job training and related programs for individuals with disabilities under Part A of Title VI of the Rehabilitation Act, upon the determination by the designated state agency that for-profit organizations are better qualified to provide vocational rehabilitation services than nonprofit agencies and organizations.

**(b) Cooperative agreements with private nonprofit organizations.**

Attachment 4.8(b)(3) describes the manner in which the designated state agency establishes cooperative agreements with private nonprofit vocational rehabilitation service providers.

# Preprint - Section 6: Program Administration

## Section 6: Program Administration

### **6.1 Designated state agency. (Section 625(b)(1) of the Rehabilitation Act; 34 CFR 363.11(a))**

The designated state agency for vocational rehabilitation services identified in paragraph 1.2 of the Title I State Plan is the state agency designated to administer the State Supported Employment Services Program authorized under Title VI, Part B, of the Rehabilitation Act.

### **6.2 Statewide assessment of supported employment services needs. (Section 625(b)(2) of the Rehabilitation Act; 34 CFR 363.11(b))**

Attachment 4.11(a) describes the results of the comprehensive, statewide needs assessment conducted under Section 101(a)(15)(a)(1) of the Rehabilitation Act and subparagraph 4.11(a)(1) of the Title I State Plan with respect to the rehabilitation needs of individuals with most significant disabilities and their need for supported employment services, including needs related to coordination.

### **6.3 Quality, scope and extent of supported employment services. (Section 625(b)(3) of the Rehabilitation Act; 34 CFR 363.11(c) and .50(b)(2))**

Attachment 6.3 describes the quality, scope and extent of supported employment services to be provided to individuals with the most significant disabilities who are eligible to receive supported employment services. The description also addresses the timing of the transition to extended services to be provided by relevant state agencies, private nonprofit organizations or other sources following the cessation of supported employment service provided by the designated state agency.

### **6.4 Goals and plans for distribution of Title VI, Part B, funds. (Section 625(b)(3) of the Rehabilitation Act; 34 CFR 363.11(d) and .20)**

Attachment 4.11(c)(4) identifies the state's goals and plans with respect to the distribution of funds received under Section 622 of the Rehabilitation Act.

### **6.5 Evidence of collaboration with respect to supported employment services and extended services. (Sections 625(b)(4) and (5) of the Rehabilitation Act; 34 CFR 363.11(e))**

Attachment 4.8(b)(4) describes the efforts of the designated state agency to identify and make arrangements, including entering into cooperative

agreements, with other state agencies and other appropriate entities to assist in the provision of supported employment services and other public or nonprofit agencies or organizations within the state, employers, natural supports, and other entities with respect to the provision of extended services.

**6.6 Minority outreach. (34 CFR 363.11(f))**

Attachment 4.11(d) includes a description of the designated state agency's outreach procedures for identifying and serving individuals with the most significant disabilities who are minorities.

**6.7 Reports. (Sections 625(b)(8) and 626 of the Rehabilitation Act; 34 CFR 363.11(h) and .52)**

The designated state agency submits 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 Part B, of Title VI and individuals receiving supported employment services under Title I of the Rehabilitation Act.

# **Preprint - Section 7: Financial Administration**

## **7.1 Five percent limitation on administrative costs. (Section 625(b)(7) of the Rehabilitation Act; 34 CFR 363.11(g)(8))**

The designated state agency expends no more than five percent of the state's allotment under Section 622 of the Rehabilitation Act for administrative costs in carrying out the State Supported Employment Services Program.

## **7.2 Use of funds in providing services. (Sections 623 and 625(b)(6)(A) and (D) of the Rehabilitation Act; 34 CFR 363.6(c)(2)(iv), .11(g)(1) and (4))**

(a) Funds made available under Title VI, Part B, of the Rehabilitation Act are used by the designated state agency only to provide supported employment services to individuals with the most significant disabilities who are eligible to receive such services.

(b) Funds provided under Title VI, Part B, are used only to supplement and not supplant the funds provided under Title I, Part B, of the Rehabilitation Act, in providing supported employment services specified in the individualized plan for employment.

(c) Funds provided under Part B of Title VI or Title I of the Rehabilitation Act are not used to provide extended services to individuals who are eligible under Part B of Title VI or Title I of the Rehabilitation Act.

# **Preprint - Section 8: Provision of Supported Employment Services**

**8.1 Scope of supported employment services. (Sections 7(36) and 625(b)(6)(F) and (G) of the Rehabilitation Act; 34 CFR 361.5(b)(54), 363.11(g)(6) and (7))**

(a) Supported employment services are those services as defined in Section 7(36) of the Rehabilitation Act and 34 CFR 361.5(b)(54).

(b) To the extent job skills training is provided, the training is provided on-site.

(c) Supported employment services include placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of individuals with the most significant disabilities.

**8.2 Comprehensive assessments of individuals with significant disabilities. (Sections 7(2)(B) and 625(b)(6)(B); 34 CFR 361.5(b)(6)(ii) and 363.11(g)(2))**

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.

**8.3 Individualized plan for employment. (Sections 102(b)(3)(F) and 625(b)(6)(C) and (E) of the Rehabilitation Act; 34 CFR 361.46(b) and 363.11(g)(3) and (5))**

(a) An individualized plan for employment that meets the requirements of Section 102(b) of the Rehabilitation Act and 34 CFR 361.45 and .46 is developed and updated using funds under Title I.

(b) The individualized plan for employment:

1. specifies the supported employment services to be provided;
2. describes the expected extended services needed; and
3. identifies the source of extended services, including natural supports, or, to the extent that it is not possible to identify the source of extended services at the time the individualized plan for employment plan is developed, a statement describing the basis for concluding that there is a reasonable expectation that sources will become available.

**(c) Services provided under an individualized plan for employment are coordinated with services provided under other individualized plans established under other federal or state programs.**

## **Attachment 4.2(c) Input of State Rehabilitation Council**

Required annually by all agencies except those agencies that are independent consumer-controlled commissions.

Identify the Input provided by the state rehabilitation council, including recommendations from the council's annual report, the review and analysis of consumer satisfaction, and other council reports. Be sure to also include:

- the Designated state unit's response to the input and recommendations; and
- explanations for the designated state unit's rejection of any input or recommendation of the council.

### **SRC Comment:**

The SRC remains concerned with the future for transition age youth. We are glad that the Office of Rehabilitation Services (ORS)-Rhode Island Department of Education (RIDE) Memorandum of Understanding embraces the federal expectation that all students who are eligible for services have an IPE in place prior to graduation. We believe that ORS involvement early in the process will impact students' success later in life. ORS' continued presence through the high schools appears to be an appropriate way to connect with students. Last year, ORS reported that it was developing pilot projects for youth at risk to reach out to even more transition age youth at one urban school. The SRC is glad that ORS has been able to expand the projects to three urban schools. Career exploration and job experiences for transition age youth will help prepare them for quality employment in the future.

### **ORS Response:**

The MOUs between ORS and the institutions of higher education and the CA between ORS and RIDE provide a good foundation for career training and transition services. ORS has Vocational Rehabilitation (VR) Counselors assigned to each public high school in the state. Each Fall, the ORS VR Counselor conducts an orientation about ORS services. Youth with disabilities are identified by the LEA and referred to the ORS VR Counselor who conducts intake & assessment activities and facilitates vocational evaluations, summer work experiences, & maintains contact with the client through graduation and after.

The pilots, Project Search and a new pilot with the DLT South County Youth Center are all opportunities to build capacity and create multiple points of entry and service provision targeting Transition. Additionally, ORS is present at all the TAC meetings and have representation on the Transition Counsel.



The concept of the IPE being an evolving career development document that reflects the changing needs of the client throughout the rehabilitation process has been quite helpful in offering increased flexibility in clients exploring different types of occupations.

**SRC Comment:**

We appreciate that ORS has had staff vacancies and tight staff resources in the past, so we were glad to see that ORS was able to recommit staff resources to job internships, interview skill workshops, and job search and placement activities that were suspended last year. We remain concerned about the high caseload for counselors. We realize that counselors can spread themselves too thin with community presence and outreach, and agree that ORS reviewing some of these activities may be useful. Counselors themselves reported in this year's Comprehensive Needs Assessment that they would like more time to devote to counseling and guidance activities and this is something that the SRC believes is integral to the vocational rehabilitation process.

**ORS Response:**

ORS appreciates SRC's concern and continued support related to staff hiring and caseload size. ORS's posting of vacancy notices, once approved, remain a priority as does our commitment to hiring qualified counselors with a Masters Degree in Rehabilitation Counseling. Toward that end, ORS continues to maintain linkages with area colleges and universities, and to offer practicum and internship opportunities to potential future candidates currently seeking a Masters Degree in Rehabilitation Counseling.

With respect to the size of caseloads, ORS agrees that the average caseload remains on the high side. As service needs for identified populations such as individuals with developmental disabilities increase, ORS does not foresee a significant decrease in this area without additional staff resources, and anticipates based on current referral rates seeing the average caseload size increase. ORS agrees that guidance and counseling activities are important to the rehabilitation process and remains committed to working with VR Counselors on strategies to maximize the timely flow of service delivery to customers, and movement toward a quality employment outcome.

**SRC Comment:**

The SRC supports ORS efforts to build and improve liaison relationships between counselors and Community Rehabilitation Providers (CRPs) and to increase the number of CRPs. The increased marketing efforts and updated brochures, coupled with the ORS use of Workforce Development Task Group Members as

community “Ambassadors” to employers to assess their needs is also a good way to improve these relationships and attract new vendor interest in ORS.

**ORS Response:**

ORS remains committed to building capacity for both new and current vendors via fee-for-service agreements based on the recent Comprehensive Needs Assessment, customers, and programmatic need. The Workforce Development Task group members as “Ambassadors” to community employers is one way in which ORS is seeking to meet the diverse needs of customers, business community, and vendors; and they look forward to working with the SRC Outreach Committee. ORS is working in collaboration with state & private partners in addressing capacity building through training resources. One example of this is ORS working in collaboration with Center for Excellence and Advocacy (CEA) and Division of Developmental Disabilities (DD) SE Council to provide training in becoming an Employment Network, which would provide CRPs with an additional revenue source.

**SRC Comment:**

As we have consistently commented in the past several years, we recognize that ORS can take a leadership role in providing supported employment services for those individuals with the most significant disabilities who need supported employment services. We commented last year that we were excited that ORS had incentivized the fee structure for supported employment providers as a way to move providers toward more competitive and integrated employment for people with developmental disabilities. We are disappointed in the decrease from 77 to 55 successful outcomes for individuals receiving Supported Employment services. We think ORS exploring self-directed “Options Programming” providers for incorporation into Supported Employment service could serve ORS customers well. We think this could help ORS to increase the number of Supported Employment success stories.

**ORS Response:**

The Supported Employment CRP infrastructure has fractured due to state funding restrictions and new configurations. ORS has for the past 15 years endorsed integrated competitive employment as the outcome of services. With the state focus on Employment First, it is believed that alignment of funding and practice will support the mandate of access to integrated employment opportunities for all supported employment participants. The long-term support necessary to sustain employment will need to be solidified, as well.

**SRC Comment:**

The SRC looks forward to learning about the measurable goals set by ORS in an effort to determine whether customers are really receiving quality employment outcomes based on hours worked per week, hourly earnings, and health insurance benefits. We are disappointed that the use of MIS system to track data has been delayed. We would like to see increased numbers of successful outcomes and increased quality of placements measured in wages

**ORS Response:**

ORS agrees that ongoing data collection of measurable outcomes is valuable in the process of our ongoing quality assurance system. ORS continue to work closely with its Information Technology System Administrator and Electronic Case Management vendor as quality assurance data elements are identified and refined by ORS and/or the Rehabilitation Service Administration. Additionally, ORS continues to train staff on the quality assurance data elements identified by ORS, as well as the revised 2014 quality assurance compliance data elements implemented by the Rehabilitation Service Administration.

ORS remains committed to quality employment outcomes. The target for employment outcomes is based on RSA Standard & Indicators compliance with Indicator 1.1 Employment Outcomes in which ORS needs to meet or exceed by 1 or more the employment outcomes attained the previous year. Currently ORS is on a Program Improvement Plan (PIP) with the Rehabilitation Service Administration to address having not met our Standard & Indicators in 2012 and will continue to strive to meet or exceed the previous year's employment outcomes while remaining focused on our goal of increasing the average hourly wage, average hours worked and access to benefits for our customers entering employment.

ORS also remains committed to quality employment outcomes based on average hours worked per week, average hourly wage, and access to benefits such as health insurance. In FFY12 ORS saw the following overall average wage of \$11.37, and in FFY13 an average wage of \$11.55. RSA defines this quality indicator by compliance Standard and Indicator 1.5. Earnings ratio or average earnings versus state average wage as determined by wage data on the Bureau of Labor Statistics (BLS) site for RI is \$22.88. Per RSA Federal Compliance Standard, ORS needs to maintain a ratio of .52% which translates currently to an average hourly wage of about \$12.00 per hour for our customers.

This screen was last updated on Jun 9 2014 2:19PM by Sharon Dipinto

## **Attachment 4.7(b)(3) Request for Waiver of Statewideness**

This agency **has not** requested a waiver of statewideness.

This screen was last updated on Sep 8 2009 9:58AM by Sharon Dipinto

## **Attachment 4.8(b)(1) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Investment System**

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce investment system with respect to

- Federal, state, and local agencies and programs;
- if applicable, Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture; and
- if applicable, state use contracting programs.

The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS works with include: hospitals, medical and disability support organizations, educational institutions, professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, substance abuse treatment facilities, and advocacy groups.

Memorandums of Understanding have been negotiated with , Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island and Community College of Rhode Island), Rhode Island Department of Education (RIDE), Rhode Island Department of Labor and Training (DLT), and the Rhode Island Department of Health (DOH).

In order to enhance our recruitment of qualified rehabilitation counselors, ORS has a Memorandum of Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate students.

ORS has cultivated a strong working relationship with independent living centers to augment our vocational rehabilitation services. The IL centers have the ability to provide support services, transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services.

In order to enhance these working relationships, ORS assigns Vocational Rehabilitation Counselors to function as liaisons to various community agencies.

This screen was last updated on Apr 28 2014 11:16AM by Sharon Dipinto

## Attachment 4.8(b)(2) Coordination with Education Officials

- Describe 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 vocational rehabilitation services, including provisions for the development and approval of an individualized plan for employment before each student determined to be eligible for vocational rehabilitation services leaves the school setting or, if the designated state unit is operating on an order of selection, before each eligible student able to be served under the order leaves the school setting.
- Provide information on the formal interagency agreement with the state educational agency with respect to
  - consultation 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;
  - transition planning by personnel of the designated state agency and educational agency that facilitates the development and completion of their individualized education programs;
  - roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services;
  - procedures for outreach to and identification of students with disabilities who need transition services.

ORS has agreements with RI Department of Education and an MOU with the institutions of higher learning. Based on feedback from the 2012 Rehabilitation Services Administration (RSA) 107 monitoring visit, ORS amended its Memorandum of Understanding (MOU) between the Department of Education (RIDE) and Department of Human Services/Office of Rehabilitation Services (DHS/ORS). The MOU has been changed to a Service Agreement. The Service Agreement identifies students with disabilities who are eligible for transition services with ORS for the purpose of eventually achieving successful employment outcomes. Incorporated into this agreement is the required Federal expectation that all students who are eligible for services have an approved Individualized Plan for Employment (IPE) prior to graduation. The agreement describes interagency collaboration and coordination, the role and responsibilities of each partner, the process for resolving disagreements, as well as providing a Collaborative Services Chart (CSC). The CSC identifies which agency is primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services.

A Memorandum of Understanding (MOU) also exists between the Department of Human Services/Office of Rehabilitation Services (DHS/ORS) and three state institutions of higher education: Community College of Rhode Island (CCRI),

Rhode Island College (RIC), and the University of Rhode Island (URI). The MOU clarifies the role of each partner in fostering a seamless delivery system intended to support DHS/ORS customers attending post-secondary programs. It also defines the financial parameters for each partner in a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS.

This screen was last updated on Apr 28 2014 11:18AM by Sharon Dipinto

## **Attachment 4.8(b)(3) Cooperative Agreements with Private Nonprofit Organizations**

Describe the manner in which the designated state agency establishes cooperative agreements with private non-profit vocational rehabilitation service providers.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to develop fee-for-service agreements with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities. An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA) or by the individualized needs of customers, will initiate efforts to create a new service or training option. Fee-for-service agreements incorporate a similar process with the Community Rehabilitation Provider (CRP) being funded based upon authorization, service provision, and outcomes. ORS will utilize the information from the FFY2014 Statewide Comprehensive Needs Assessment (CNA) as a foundation for expansion and/or development of new fee-for-service agreements that meet the employment needs of customers.

The Continuous Quality Improvement Committee will work with the CRP Supervisor to develop increased options for individuals with disabilities who are considered underserved and/or minority populations based on the CNA findings. In addition, ongoing Quality Improvement activities such as the quarterly satisfaction survey developed and implemented by the SRC State Plan and Continuous Quality Improvement Committee, as well as the ORS Strategic Planning Supervisor, provides ongoing information that is relevant to customers' vocational rehabilitation needs.

ORS has a long-standing history of cultivating collaboration between ORS, CRPs, and the netWORKri One-Stop system. It is anticipated that this effort will continue through FFY2015. ORS, through its parent agency, Rhode Island Department of Human Services, is a financial and programmatic partner with Rhode Island netWORKri One-Stop Centers. ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston One-Stop Career Center/netWORKri. In addition, ORS personnel, through the Assistive Technology grant (ATAP), provide consultation and training to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One Stop Centers. In addition, ORS personnel are members of each of the two regional workforce investment boards (WIB): Providence/Cranston Workforce Solutions and Greater



Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and participate in annual Request for Proposal reviews.

This screen was last updated on Apr 28 2014 11:18AM by Sharon Dipinto

## **Attachment 4.8(b)(4) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services**

Describe the efforts of the designated state agency to identify and make arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities in order to provide the following services to individuals with the most significant disabilities:

- supported employment services; and
- extended services.

The Rhode Island Office of Rehabilitation Services (ORS) continues to embrace supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils, and has representation on the Developmental Disabilities Council.

From FFY 2014 through FFY 2015 the Office of Rehabilitation Services (ORS) will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options. ORS will sponsor and partner with the Sherlock Center, the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH), Division of Developmental Disabilities (DD) and Division of Behavioral Health (BH) Supported Employment Advisory Councils. ORS staff also provide ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, and core values has occurred with staff of ORS and with CRPs to increase their understanding of the ORS Supported Employment process and intent. ORS, as a leader, trainer and funding source of supported employment services, engages community resources to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP agreeing to provide support services to the individual with a disability on a long-term basis. This shift in service delivery responsibility is well coordinated by the ORS counselor and CRP agency staff and long-term support provider so that there will be a seamless delivery of needed services to the individual.

The time frame for transitioning an individual from support services provided by both ORS and the CRP to extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with the Paul V. Sherlock Center on Disabilities, Rhode Island College, FEDCAP Center for

Excellence and Advocacy , and the Institute for Community Inclusion to provide training and improve the quality of services provided by supported employment providers. ORS will continue to increase the number of qualified fee-for-service providers to improve and expand services for customers. In FFY 2015 ORS will encourage CRPs to collaborate with each other to meet the diverse employment needs of significantly disabled individuals and to examine service delivery systems to ensure customer access to supported employment options. This collaboration is encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. In 2013, SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. A new service delivery model and fee structure was designed and implemented on 4/1/2013 for Supported Employment Services and was facilitated to accomplish a few objectives:

1. Offset significant funding limitations that have been implemented over the years within the Supported Employment provider community due to funding decreases of BHDDH.
2. Create a service delivery system that had increased flexibility and options to assist clients in job preparation.

In recognition of these challenges, ORS personnel met with supported employment providers, representatives of BHDDH, and ORS counselors to discuss and assess ongoing service provider capabilities and limitations. As a result of these meetings, new goals or procedures are developed and implemented. The revised SE fee structure provides a more individualized community-based functional and flexible array of service options and includes recommendations for a job preparation component. Also reimbursement for job placement is incentivized and reinforces a commitment to quality employment outcomes based on hours of work per week as well as access to benefits. In 2013 - 2014, new Fact Sheets were developed and updated for Supported Employment Services: SE Assessment/Voc. Evaluation; SE Situational Assessments in the Community; SE Job Preparation; SE Job Development, Placement and Retention; and Job Coaching. Corresponding reporting forms for these services and SE Training and Support services are also provided. The Fact Sheets and reporting forms were designed to provide a clear understanding of each service component and to create a consistent standard of quality across providers. This information is accessible via the ORS website.

This screen was last updated on May 12 2014 10:54AM by Sharon Dipinto

# Attachment 4.10 Comprehensive System of Personnel Development

## Data System on Personnel and Personnel Development

1. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

- the number of personnel who are employed by the state agency in the provision of vocational rehabilitation services in relation to the number of individuals served, broken down by personnel category;
- the number of personnel currently needed by the state agency to provide vocational rehabilitation services, broken down by personnel category; and
- projections of the number of personnel, broken down by personnel category, who will be needed by the state agency to provide vocational rehabilitation services in the state in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

In FFY2013, the Vocational Rehabilitation (VR) Program has served approximately 6,489 individuals, with an average caseload of 162. ORS has a total of 87 full-time equivalent (FTE) positions which includes 40 rehabilitation counselor positions. ORS has continued to recruit and hire counselors for vacancies when they arise. All new counselors have Master’s Degrees in Rehabilitation Counseling. During FFY2013, One VR Counselor II retired and a VR Counselor I was promoted leaving that position vacant. During FFY2013, ORS also had a vacancy for the Chief Human Services Business Officer position, Social Caseworker II, and one for a Data Control Clerk. Over the next 3 to 5 year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Vocational Rehabilitation Counselor I	26	2	3
2	Vocational Rehabilitation Counselor II	14	1	4

3	Case Aide	3	1	0
4	Supervisory	11	0	3
5	Administrative	5	1	4
6	Fiscal	6	2	1
7	Support Staff	10	0	1
8	Direct Services	4	0	1
9	Social Services	8	1	3
10		0	0	0

2. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- a list of the institutions of higher education in the state that are preparing vocational rehabilitation professionals, by type of program;
- the number of students enrolled at each of those institutions, broken down by type of program; and
- the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI. There are approximately 176 students enrolled in the graduate programs (104 at Assumption College, 72 at Salve Regina University) with 41 expected to graduate in May 2014 from these programs.

Row	Institutions	Students enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
1	Assumption College	104	0	0	29

2	Salve Regina University	72	0	0	12
3		0	0	0	0
4		0	0	0	0
5		0	0	0	0

**Plan for Recruitment, Preparation and Retention of Qualified Personnel**

Describe the development (updated on an annual basis) and implementation of a plan to address the current and projected needs for qualified personnel including, the Coordination and facilitation of efforts between the designated state unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

**RECRUITMENT AND RETENTION**

**1. INSTITUTIONS OF HIGHER EDUCATION**

- ORS has ongoing communication with Assumption College and Salve Regina University to ensure that the present and projected needs of ORS are considered in the program planning. In addition, Assumption College and Salve Regina University offer a Master’s in Rehabilitation Counseling program through a combination of distance learning and campus-based courses.
- ORS continues to provide both practicum and internship opportunities for local graduate students. During FFY2013 ORS had two graduate students, one from Salve Regina University and one from Assumption College completing their practicum assignments, and in FFY2014 will have three from Salve Regina University and one from Assumption College completing their practicum assignments.
- The ORS Acting Associate Director is a member of the Technical Assistance Continuing Education (TACE) Advisory Committee at Assumption College which assists with expanding training options for staff. This Committee meets quarterly and consists of Training Coordinators from various other New England states.
- The ORS Acting Associate Director and the Training Coordinator serve on the Advisory Board for the Rehabilitation Counseling Graduate Program at

Salve Regina University which enhances the relationship with ORS and identifies current rehabilitation trends.

## 2. PROFESSIONAL ASSOCIATIONS

- In addition, our efforts to recruit qualified personnel have consisted of maintaining an active relationship with the Rhode Island Chapter of the National Rehabilitation Association (RIRA).
- ORS is in the process of becoming an organizational member of the Association of People Supporting Employment First (APSE).

## 3. EFFORTS TO RECRUIT, PREPARE, MAINTAIN PERSONNEL FROM MINORITY BACKGROUNDS AND INDIVIDUALS WITH DISABILITIES

- ORS makes every effort to hire staff in accordance with the agencies affirmative action policies.
- ORS job announcements are distributed to community-based agencies and the internet to attract qualified individuals, particularly individuals with disabilities and minority backgrounds.
- ORS has recruited and retained a number of qualified individuals with disabilities (21 - visual impairments, Deafness, psychiatric/emotional, physical disabilities, etc) and minority backgrounds (7 - bi-lingual case aides and counselors).
- ORS actively recruits graduate students with disabilities and minority backgrounds for the practicum and internship program. ORS has had 19 graduate students for practicum/internships over the past few years, of which 17 were hired as Rehabilitation Counselors, all with Masters Degrees in Rehabilitation Counseling.
- ORS will continue to explore long-term strategies in FFY2014 for recruitment of personnel from diverse cultural backgrounds.

## **Personnel Standards**

Describe the state agency's policies and procedures for the establishment and maintenance of personnel standards to ensure that designated state unit professional and paraprofessional personnel are adequately trained and prepared, including:

1. standards that are consistent with any national or state-approved or -recognized certification, licensing, registration, or, in the absence of these requirements, other comparable requirements (including state personnel

- requirements) that apply to the profession or discipline in which such personnel are providing vocational rehabilitation services; and
2. to the extent that existing standards are not based on the highest requirements in the state applicable to a particular profession or discipline, the steps the state is currently taking and the steps the State Plans to take in accordance with the written plan to retrain or hire personnel within the designated state unit to meet standards that are based on the highest requirements in the state, including measures to notify designated state unit personnel, institutions of higher education, and other public agencies of these steps and the timelines for taking each step.

Be sure to include the following:

- specific strategies for retraining, recruiting, and hiring personnel;
- the specific time period by which all state unit personnel will meet the standards;
- procedures for evaluating the designated state unit's progress in hiring or retraining personnel to meet applicable personnel standards within the established time period;
- the identification of initial minimum qualifications that the designated state unit will require of newly hired personnel when the state unit is unable to hire new personnel who meet the established personnel standards;
- the identification of a plan for training newly hired personnel who do not meet the established standards to meet the applicable standards within the time period established for all state unit personnel to meet the established personnel standards.

## PERSONNEL STANDARDS

### 1. ADEQUATELY PREPARED AND TRAINED STAFF

- Although Rhode Island does not have a state approved or recognized certification, licensure, or registration requirements for Rehabilitation Counselors, the Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's Degree in Rehabilitation Counseling.
- ORS will continue to monitor any state efforts for licensure of Rehabilitation Counselors.
- Rehabilitation Counselors are highly encouraged to obtain the State of RI Qualified Rehabilitation Counselor Certification.
- During FFY 2013 ORS piloted a program to encourage and fund counselors to pursue their CRC. Seven VR Counselors received their CRC.

### 2. NEW PERSONNEL



- All new Rehabilitation Counselors are required to meet the standard of a Master's Degree in Rehabilitation Counseling from an accredited program.
- ORS has been able to fill all vacancies with individuals with a Master's Degree in Rehabilitation Counseling since 10/01/2000, of which 17 completed practicum/internships with ORS.
- ORS has worked aggressively with the institutions of higher education to recruit qualified individuals to fill vacancies.
- ORS expects that it will be able to continue to hire individuals who meet the standard.
- ORS will continue to fill all fiscal and support staff vacancies with individuals who meet state requirements for education and experience.

### 3. EXISTING PERSONNEL

- Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Master's level in Rehabilitation Counseling. All field VR Supervisors and Administrators meet the CSPD standard.
- ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan.
- ORS is structuring mentoring activities around specific specialization areas in anticipation of future retirements.
- All existing fiscal and support staff meet or exceed state requirements for education and experience.

### **Staff Development**

Describe the state agency's policies, procedures, and activities to ensure that all personnel employed by the designated state unit receive appropriate and adequate training in terms of:

1. a system of staff development for professionals and paraprofessionals within the designated state unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology; and
2. procedures for the acquisition and dissemination to designated state unit professionals and paraprofessionals significant knowledge from research and other sources.

### STAFF DEVELOPMENT

- ORS recognizes the importance of ensuring that its staff has the necessary skills and abilities to provide quality services in a professional and timely manner.
- The Training Coordinator conducted a needs assessment of personnel training needs between December 2013 and February 2014. Examples of areas identified for training included: Motivational Interviewing, Substance Abuse, Ethics in Rehabilitation Counseling, Autism and Asperger's, Cultural Diversity, Supported Employment, Ticket to Work, Social Security Reimbursements, Employment Networks Partnership Plus, Job Development and Placement for staff, as well as for VR Vendors. The needs assessment was analyzed for priorities and a training schedule is being planned and will be implemented.
- In order to retain qualified staff and in anticipation of additional staff retirement, ORS has and will continue to offer leadership development training, succession planning, and capacity building opportunities to interested staff. Management staff has included interested personnel in activities such as: assistive technology, transition, training, CRP development, quality assurance, and strategic planning as a means of expanding agency knowledge base about these content areas. This is of particular importance, given the number of personnel who plan to retire in the near future, and the unique content knowledge of these positions. Of forty Rehab Counselors, thirteen have been on the job for less than 5 years; thus necessitating the training on rehabilitation basic, best practices, and ORS policies and procedures. ORS believes that the next 3-5 year period is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility. ORS recognizes the importance on ensuring that its staff has the necessary skills and abilities to provide quality services in a professional and timely manner.
- The Institute for Community Inclusion (ICI) at the University of Massachusetts in Boston has been awarded the Technical Assistance and Continuing Education (TACE) grant and will be utilized to provide state-of-the-art training programs for all counselor and supervisory staff at ORS. ORS is currently working with the TACE representative and ORS field supervisors to prioritize upcoming trainings. Training on Ticket to Work and Work Incentives is also planned.

### **Personnel to Address Individual Communication Needs**

Describe how the designated state unit has personnel or obtains the services of other individuals who are able to communicate in the native language of

applicants or eligible individuals who have limited English speaking ability or in appropriate modes of communication with applicants or eligible individuals.

## COMMUNICATION NEEDS

- Interpreters and are available for staff to communicate with diverse customer populations, for staff trainings, and supervision. ORS has two Video Relay stations to enable communication in ASL between staff who are Deaf or Hard of Hearing, their colleagues, and customers. ORS utilizes an UBI Duo in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing and their colleagues and customers.
- These training videos can also be a resource for any personnel Corrective Action Plan.
- The Human Services Policy and Systems Specialist, who manages the ORS and the Assistive Technology Access Partnership (ATAP) web pages, has expertise in providing materials in alternate formats, and develops electronic tools for counselors. ORS assures that all information disseminated to staff with disabilities and customers is available in accessible format.
- - The Workforce Development Task Group was recently created and has incorporated the previous Marketing and Cultural Diversity Committees as well as working with the SRC Marketing/Outreach subcommittee to increase ORS's presence in the community. This committee continues the tradition of the previous committees in its commitment to raise the cultural competency of personnel and ensure that the Agency resources are accessible to culturally diverse populations.
  - This committee is working with the Deaf and Hard of Hearing Region at ORS to develop and produce an ASL video to be available. Access to ORS information and services is provided through the use of the Language Line- The Big Word, interpreters from a variety of resources and bilingual staff.
  - The Workforce Development Task Group is also working to update ORS brochures as well as work with its members to become "Ambassadors" to community employers so as ORS can be responsive to their employment needs.

## **Coordination of Personnel Development Under the individuals with Disabilities Education Improvement Act**

Describe the procedures and activities to coordinate the designated state unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Improvement Act.

### **PERFORMANCE EVALUATION SYSTEM**

- ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.
- The annual needs assessment conducted by the Training Coordinator elicits input from counselors, supervisors, support staff, and administrators regarding training needs.
- If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS policy & procedures, and union regulations.
- ORS Transition Counselors attend bi-monthly Transition Counselor meetings to look at how we are working with youth with disabilities who are still in school.
- ORS is actively involved with state initiatives such as "Shared Youth Vision", Statewide Transition conference, as well as participation on the local Transition Advisory Councils (TACs). Staff are also on the RIVESP committee and Transition Council that is chaired by RIDE.
- On an annual basis, ORS has leadership from RIDE come in to talk about updates in terms of transition planning, and standards of graduation.

### **STATE REHABILITATION COUNCIL**

Pursuant to the Act, ORS offers to the State Rehabilitation Council (SRC) the opportunity to review and comment on the CSPD.

ORS will include the comments in the FFY2014 Attachment 4.2(c) update.

This screen was last updated on May 19 2014 10:26AM by Sharon Dipinto

## Attachment 4.11(a) Statewide Assessment

Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the vocational rehabilitation services needs of:

- individuals with most significant disabilities, including their need for supported employment services;
- individuals with disabilities who are minorities;
- individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program; and
- individuals with disabilities served through other components of the statewide workforce investment system.

Identify the need to establish, develop, or improve community rehabilitation programs within the state.

### **RESULTS OF COMPREHENSIVE STATEWIDE ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES AND NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS**

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, minorities with significant disabilities, underserved individuals, and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs (CRPs). ORS views the CNA as an evolving process that incorporates information from several diverse sources rather than from any one event or data source. During FFY2014, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

- Agency strategic planning
- Annual personnel needs assessments
- Community Comprehensive Needs Assessment Survey
- Compliance with Rehabilitation Services Administrations' Standards & Performance Indicators
- Customer Satisfaction Survey

- Environmental Scan of data including: FFY2012 RSA Annual Agency Review, Internal MIS reports, American Community Survey, 2011 RI Employee Benefits Report, and November 2012 RI Employment Trends & Workforce Issues RI Department of Labor and Training Market Unit
- Implementation of the ORS 107 Monitoring Report
- Rhode Island Governor's Commission on Disability Public Forums
- Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
- Focus group with key staff informants

## **AGENCY STRATEGIC PLANNING**

The Rhode Island Office of Rehabilitation Services (ORS) seeks to involve agency staff in identifying the challenges and solutions needed to more effectively assist all individuals with significant disabilities to select, prepare for, obtain and maintain employment. On December 20, 2013 Vocational Rehabilitation Services staff convened for a strategic planning day to reinforce the agency's strategic planning goals and development of annual work plans. Information for strategic planning was gathered through 2013/2014 CNA activities, meetings with the seven field services regions, annual agency work plans, and Quality Improvement Activities. ORS will continue to assess information as it becomes available and will continue to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan. Therefore, the strategic planning objectives have been modified in the following way:

- Coordinate joint training opportunities for CRP and ORS personnel
- Maximize ORS' collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and business community
- Promote CRP capability in the provision of a continuum of employment services
- Encourage assessment activities and plan development that promotes informed choice, self-determination, and case movement toward employment
- Enhance Supported Employment services with emphasis in integrated and competitive goals
- Coordinate staff resources to work in collaboration with the SRC Outreach, QI/State Plan and Transition Subcommittees

- Emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses
- Maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits)

## **ANNUAL PERSONNEL NEEDS ASSESSMENTS**

The Training Coordinator of ORS conducts an annual Training Needs Assessment. From December 2013 to February 2014, information elicited from staff is used to establish a list of training topics and concerns.

- The VR Counselor CNA survey consisted of staff self-report identifying their top areas of training needs. Example of areas identified for training include: Supported Employment Training for VR Counselors and VR Vendors, Motivational Interviewing, Substance Abuse, Ethics and Vocational Rehabilitation, Autism/Asperger's Training, Worker's Compensation, Learning Disabilities and Transition, and Working with clients who have Criminal Backgrounds.
- A training schedule is being developed based upon the identified needs and will be implemented throughout the year. This year, ORS anticipates an increase in the number of referrals of individuals with most significant disabilities who may require supported employment or extended evaluation services. Training in this area is planned for both staff, state partners, and for Community Rehabilitation Providers (CRP'S).
- ORS has many new counselors (13 out of 40) who have been on the job 5 years or less.
- ORS will also be providing some specialized training to Management staff and Vocational Rehabilitation Counselor II's in the areas of clinical supervision and leadership skills.
- In addition, ORS works with TACE and ICI to provide training opportunities for new and existing personnel. These trainings provide opportunities for all staff to improve on their professional practices to ensure quality employment outcomes for our consumers.
- The agency continues to maintain a relationship with two colleges that offer MA programs in Rehabilitation Counseling. An adequate supply of qualified Rehabilitation Counselors, supervisory, administrative, fiscal, and support personnel are essential to provide quality rehabilitation services to customers of ORS.

## **COMMUNITY COMPREHENSIVE NEEDS ASSESSMENT SURVEY**

The 2014 survey conducted by ORS and the RI State Rehabilitation Council (SRC) was sent to 398 individuals, which included CRPs, educational providers, the Department of Labor and Training, and service providers of Intellectually Developmentally Disabled and Behavioral Health individuals. Recipients of the survey were also encouraged to forward the survey to other interested parties; therefore the exact number who received the survey is unclear. Seventy-eight individuals completed the survey which represents a 20% return rate based on the 398. By comparison in 2011 the Community CRP CNA was sent to 67 recipients with a response of 34 surveys or 51%. While the response percentage is lower in 2014, by reaching more individuals' the agency saw a 44% increase over the 2011 number of responses thus providing the agency with more information on the needs of individuals with disabilities.

The survey conducted through Survey Monkey sought to identify the following:

- Quality of services received by people with disabilities to prepare for, obtain and maintain employment
- Availability of services throughout the state
- Obstacles customers confront in attempting to prepare for, obtain and maintain employment
- Individuals with disabilities who are underserved

Several significant findings were reflected by the results:

- Availability of jobs, individual's social skills, personal/home life barriers and fear of losing SSI and SSDI, medical benefits, and other subsidies, ranked as the top four issues preventing individuals from obtaining employment
- The top four issues preventing individuals from maintaining employment included personal home life barriers, social skills, availability of jobs and availability/cost of transportation
- Organizations felt unable to meet customers' needs for benefits counseling and off-site retention supports, including long term Supported Employment supports and job coaching. Work trials, internships and situational assessments were also noted, as was job preparation counseling, employment planning/assessments, interview preparation, and case management.

Respondents identified the following disabilities as least served by ORS:

- Substance abuse related disorders
- Intellectual Developmental Disability
- Behavioral Health



Respondents identified the following ethnic populations as least served by ORS:

- American Indian/Alaska Native
- Pacific Islander/Native Hawaiian
- Asian

CRPs indicated that ORS could:

- Enhance providers awareness of employer resources i.e. ADA, tax incentives, etc.
- Continue to enhance communication regarding ORS updates and changes to policies affecting services
- Continue to build and improve liaison relationships between counselors and CRPs
- Increase awareness of other provider resources, such as long term funding options
- Assist with recruitment of employers

## **COMPLIANCE WITH STANDARDS & PERFORMANCE INDICATORS**

For FFY 2013 ORS met Standard 1 with positive outcomes for Performance Indicators 1.1, 1.2, 1.3, 1.4 and 1.6 and met standard 2.1. As a result of not making Standard 1 and 2 for FFY 2012, the Office of Rehabilitation Services as directed by Section 107 of the Rehabilitation Act is currently on a Program Improvement Plan. With the goal of maintaining the highest quality of service to customers, the Strategic Planning Supervisor will continue to monitor the agency's compliance with all Standard and Indicators on a monthly basis with findings reported to the administration, QI Committee, supervisory personnel and staff.

## **CUSTOMER SATISFACTION SURVEY**

ORS maintained utilization of the Customer Satisfaction Surveys designed in 2009 with input from the SRC State Plan and Quality Improvement sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers with successful case closures as well as to those whose cases closed unsuccessfully following receipt of services.

The following conclusions were formulated based on the results of the surveys.

### **Successful Closure Satisfaction Survey:**

Since the 2011 CNA respondents to the survey indicated ORS has improved in preparing participants to obtain and maintain employment that matches their goals, interest and abilities. While the 2013 satisfaction survey results reflect a decrease from the 2012 responses, the results continue to reflect improvement over the 2011 data in the areas of better preparing participants for employment and providing information to enable individuals to make informed decisions regarding benefits, Social Security and state specific benefits. Areas that continue to reflect need for monitoring are ensuring individuals are aware they can re-contact ORS for services after they are closed and quality of employment outcomes. Overall respondents continue to indicate that they would refer a friend for family member to ORS services.

### **Status 28 Customer Satisfaction Survey – Unsuccessful Closure after provision of services:**

Results of the satisfaction survey since the 2011 CNA reflect the following areas for continued monitoring: ensuring customers are provided information on work incentives, Social Security and state specific benefits, educating customers on the assessment process and identifying the need for assistive technology.

Throughout the rehabilitation process it is crucial to ensure that individuals are referred to services that match their individual needs. 20% of the respondents expressed that the process takes too long, resulting in discontinuing services. In 2013, over 20% of respondents indicated that they are working. 30% indicated not being aware that they can re-apply for services with ORS after their case was closed.

### **ENVIRONMENTAL SCAN**

The environmental scan included information from a variety of sources such as: Agency MIS data, RSA data, RI Department of Labor & Training (DLT) and Department of Labor – Bureau of Labor Statistics, Disability Employment Statistics-U.S Department of Labor’s Bureau of Labor Statistics, American Community Survey US Census Bureau 2009-2011 2011 RI Employee Benefits Report, and November 2012 RI Employment Trends & Workforce Issues RI Department of Labor and Training Market Unit. The sources indicated the following:

- The number of Rhode Islanders obtaining a high school degree/equivalency is below the national average and is the lowest in New England. This educational disparity will present a challenge in the coming years as it is projected that 41.7% of available jobs require a minimum of a High School/equivalency degree.
- While RI employment rate has improved since the 2011 CNA it remains one of the highest in the nation at 9% and the highest among the New England States.

- The 2011 Rhode Island Employee Benefits Report indicated that 73% of RI employers offered health insurance to full time employees and 13% offered health insurance to part time employees.
- The American Community Survey US Census Bureau 2009-2011 earnings estimate reflects that Rhode Islanders with a disability median income for a 12-month period in 2011 was \$21,932 overall, males earned \$26,464, and females earned \$18,890. Conversely, their non-disabled counterparts for the same period had a median income of \$31,957 overall, males \$38,024 and females \$27,098.
- Information from the November 2012 RI Employment Trends & Workforce Issues, RI Department of Labor and Training Market Unit indicates 44.3% of RI residents in 2010 were more likely to come from Latin America. 51.5% of European born RI residents are from Portugal and 80.7 % are from Western Africa. RI foreign-born residents (39.2% of the total population) are three times more likely to have not graduated high school than those born in the U.S. The 2010 Census and 2000 Census indicated that the largest population in RI is Caucasion, followed by Hispanic or Latino, Black or African American, and Asian. 6% identified themselves as some other race. RI counties with the highest Asian population are Providence 3.7%, Kent County 2.0% and Newport and Washington County at 1.6%. Hispanic populations centered in the counties of Providence 18.8%, Newport 4.2% and Kent 3.2%.
- Information obtained from Disability Employment Policy Resource by Topic in January 2013 16 to 19 year-olds with a disability were employed at a rate of 12.7% as opposed to 24.9% for non-disabled youth. For youth ages 20 to 24 with a disability, the employment rate was 25.7% versus 60.6% for non-disabled.
- Post 9/11 and Total Veteran's Unemployment Rates by State for 2011 show veterans in RI with an overall unemployment rate of 14.6% versus the US rate of 8.3%. The post 9/11 veteran unemployment rate is 16.8% for RI, and 12.1% for the US. RI is above its neighbors of Massachusetts and Connecticut who have over all % respectively of 9.5% and 9.4% and post 9/11 veteran unemployment rates of 7% and 8.7%
- Analysis of available RSA statistics for average hours worked per week highlights that in FFY 2011 the ORS average for non SE placements of 28.36 hours/week was below the national average of 32.23. The same held true for ORS average hourly earnings (\$11.15) compared to the national average of \$11.44. Supported Employment data showed ORS to be below the national average of 24.17 in work hours at 16.21/week, but above the national average in hourly wage with \$9.17 versus \$8.94. ORS was below the national average in work hours, but above the national pay per hour for

Self Employment. BEP work hours and pay were below the national average.

- RSA data on ORS employment outcomes by disability for FFY 2011 indicates that ORS is above the national average for visual impairments and mental & emotional disabilities and below the national average for physical impairments, communicative impairments, and cognitive impairments.
- Data available through RSA indicates for FFY 2011 ORS was above the national average in percentage of transition age youth (14 to 24) served in general/combined agencies with 38.7% versus the national average of 35.18%. For the same period ORSs' transition employment rate was 63.31% as opposed to the national average of 51.83%. Average work hours of 25.74% and average hourly pay of \$9.36 for the transition population in FFY 2011 was below the national average of 29.90 hours/week and \$9.56/hour. RSA data for individual age 65 and over reflects that RI is below the national average in employment rate, wage and hours.

## **IMPLEMENTATION OF THE ORS 107 MONITORING REPORT**

The Rehabilitation Services Administration (RSA) conducted a review of ORS in March 2012. The RSA review processes included program performance evaluations, on-site and telephone discussions with stakeholders, and on-site visits with staff, and members of the SRC. RSA found several strengths in the program: strong leadership and dedicated staff; close collaboration with key partners; statewide presence at the netWORKri One-Stop Centers; and statewide cooperative partnerships with all school districts and transition services to youth. The most recent review included an assessment of transition services, organizational structure, and fiscal integrity of ORS. For FFY2015 ORS will focus on the following areas identified in the monitoring report as programmatic goals:

- Continue implementation of a comprehensive Continuous Quality Improvement Plan (CQIP)
- Meet compliance standards for eligibility and IPE development
- Improve the quality of employment outcomes for transition-aged youth, Supported Employment, and adults
- Improve the rehabilitation rate for transitioning youth

## **RHODE ISLAND GOVERNORS COMMISSION ON DISABILITIES PUBLIC FORUMS TO IDENTIFY THE CONCERNS OF PEOPLE WITH DISABILITIES AND THEIR FAMILIES**

The Office of Rehabilitation Services participates annually in the Rhode Island Governor's Commission on Disabilities (GCD) Public Forums. In 2013, staff from ORS participated in the six forums held throughout the state. The forums allow individuals with disabilities, family members, advocates, and providers to present concerns about any of the services/resources for individuals with disabilities. The forums and subsequent public document by the GCD provides ORS with information on themes relevant to employment services for individuals with disabilities.

Employment related themes included:

- Concern over the continuum of services related to the Employment First Initiative
- Supported employment services, lack of long-term funding options and service need ratio to staffing
- Impact on individual benefits and services
- Continuity of services for transition-age youth as they move from one system to another

## **VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT**

In the summer of 2013 ORS and the RI State Rehabilitation Council developed and distributed a survey using Survey Monkey. The survey solicited staff perceptions on the needs of VR customers, barriers to services, and suggestions for improvement to VR services. Questions focused on the following areas: needs of the most significantly and significantly disabled, underserved and unserved populations, need for further development of CRPs, as well as use of the DLT netWORKri One-Stop system and youth centers to assist customers with disabilities to maintain and/or enter employment. The survey was sent to 79 individuals within the agency with 46 or 58% responses to the survey. In comparison the 2011 CNA was sent to 48 individuals within the agency with a response of 26 or 54.17%. As done with the Community CNA, ORS sought to include more agency input. Therefore, the 2014 staff CNA included VRC, VR Supervisors, fiscal, support staff, etc. which resulted in a 56.52% increase in the 2014 CNA response from 2011 CNA. Follow-up was completed with seven key informants who self-identified in their survey they would like to be contacted. In a focus group setting, 3 of the 7 met on 11/14/13 with the QI Committee to further share their feedback on the needs of individuals served by ORS.

Findings reflected the following themes:

Evaluation of ORS's improvement in areas noted in 2011

- CNA Services to the Deaf/Hard of Hearing, individuals with Psychiatric and Emotional Disabilities and African-Americans ranked as the top three most improved areas since the 2011 CNA.

Respondents indicated the following as the least improved areas since the 2011 CNA

- Services for the South East Asian community, Native Americans and Students with 504 plans ranked as the top opportunities to improve outcomes for underserved groups.

Respondents suggested the following to better encourage customer commitment to the rehabilitation process:

- Enhance guidance and counseling relationships
- Ensure vendors are accountable for the services they have been approved for through improved communication
- Renewed focus on provision of services/less involvement in activities not related to agency mission
- Focus on liaison relationships/community involvement

Needs of Individuals with Most Significant/Significant Disabilities:

- Continue to develop services and fee structures based on evidence of regional needs for specific populations throughout the state
- Increase the capacity and knowledge base of CRPs who provide Supported Employment services
- Improve access to vendors and interpreters who have technical competence, as well as awareness of cultural issues and distinctions
- Increase access to vendors with the ability to work with customers using non-English American Sign language
- Increase the capacity of CRPs who work with individuals with Developmental Disabilities to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
- Educate employers about the use of tax credits, hiring incentives, on-the-job training, internships, and other services that ORS provides.
- Establish a standard for CRP services to ensure consistent quality services through joint training with ORS staff and CRP vendors

- Develop service options that incorporate work place social skills and daily time management

#### Rehabilitation Needs of Minorities:

- Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the state
  - Continue to develop and enhance Supported Employment and Work-Trial opportunities
  - Educate staff on availability of internal and external resources such as agency forms in different languages, the Big Word, bilingual co-workers, interpreting resources, and the Cultural Diversity Cadre
  - Improve quality of Vocational Evaluation, Situational Assessment, and Job Preparation specific to minority needs with the CRP network
  - Incorporate interpretation and communication needs into the IPE
- Underserved and Unserved Populations:
- Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
  - Educate ORS staff and vendors on existing wrap around services already available in the community to address mental health, medical needs, substance abuse, and legal barriers to employment
  - Engage individual with physical disabilities, traumatic brain injury and individuals meeting Supported Employment eligibility
  - Build capacity to support transition-age youth with physical, learning, and developmental disabilities, and those with a 504-education plan
  - Improve outreach to Deaf and Hard of Hearing and Visually Impaired communities, individuals within the Pervasive Developmental Disorder (PDD) spectrum (specifically Asperger's Syndrome), and individuals with disabilities who are employed

#### Need to further develop established and/or establish new CRPs:

- Develop CRPs to address the needs within specific geographic areas, establish new CRPs, as needed, to address unmet needs, and adjust the CRPs network to address the changing needs of the customers and labor market
- Continue to improve quality, consistency, and accountability of services provided to customers in Vocational Evaluations, Situational Assessments, and Job Development

- Examine the Supported Employment process to ensure quality employment outcomes with increased hours, wages, and health benefits
- Utilize and maximize ORS collaboration with netWORKri One-Stop Centers
- Assess CRPs' ability to work with varying populations and disabilities

Meeting the needs of the Business Community:

- Educate ORS staff and CRPs to the needs of the Business Community
- Enhance presence at business expos and job fairs
- Provide Business Community with information on ADA and work place accommodations

This screen was last updated on May 12 2014 11:01AM by Sharon Dipinto



## Attachment 4.11(b) Annual Estimates

- Identify the number of individuals in the state who are eligible for services.
- Identify the number of eligible individuals who will receive services provided with funds under:
  - Part B of Title I;
  - Part B of Title VI;
  - each priority category, if under an order of selection.
- Identify 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.

### NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES UNDER THIS STATE PLAN

For FFY2013, there were 2,826 new applicants, and 2,329 individuals were deemed eligible. There were a total number of 1,939 individuals who developed their Individualized Plan for Employment (IPE), and 603 individuals who obtained successful employment outcomes. For FFY2014, ORS has a goal of 2,292 new applicants, and expects 1,817 individuals to become eligible. ORS anticipates that 1,420 new Individualized Plans for Employment will be developed and 604 successful outcomes achieved. For FFY2015, ORS projects 2,370 new applicants, with 1,858 individuals to become eligible for ORS services. ORS anticipates that, 1,461 individuals will develop Individualized Plans for Employment, and projects 605 successful outcomes.

### NUMBER OF INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER TITLE I AND TITLE VI AND NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

In FFY2015, the projected number of clients to be served under an IPE is 4,388. One hundred percent (100%) of those expected to be served will be classified in the Order of Selection as either Category 1 - most significant, or Category 2 - significantly disabled. For FFY 2015, ORS is expected to serve: Category 1 (most significant): 4,203 (Title I - 90%; Title VI - 10%); Category 2 (significant): 185 (Title I - 100%; Title VI - 0%)

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
OOS Category I - Title I	Title I	\$18,650,190	3,783	\$4,930
OOS Category I - Title VI	Title VI	\$2,070,600	420	\$4,930

OOS Category II - Title I	Title I	\$1,073,740	185	\$5,804
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Totals		\$21,794,530	4,388	\$4,966

This screen was last updated on May 2 2014 10:29AM by Sharon Dipinto

## **Attachment 4.11(c)(1) State Goals and Priorities**

The goals and priorities are based on the comprehensive statewide assessment, on requirements related to the performance standards and indicators, and on other information about the state agency. (See section 101(a)(15)(C) of the Act.) This attachment should be updated when there are material changes in the information that require the description to be amended.

- Identify if the goals and priorities were jointly developed and agreed to by the state VR agency and the State Rehabilitation Council, if the state has a council.
- Identify if the state VR agency and the State Rehabilitation Council, if the state has such a council, jointly reviewed the goals and priorities and jointly agreed to any revisions.
- Identify the goals and priorities in carrying out the vocational rehabilitation and supported employment programs.
- Ensure that the goals and priorities are based on an analysis of the following areas:
  - the most recent comprehensive statewide assessment, including any updates;
  - the performance of the state on standards and indicators; and
  - 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.

### **STATE'S GOALS AND PRIORITIES**

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Standards and Performance Indicators, monitoring reviews, quality improvement findings, and feedback from customers, advocates and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

**ORS goals for FFY2015 are as follows:**

**GOAL 1: ORS WILL DEVELOP THE CAPACITY TO ACCURATELY TRACK ADMISSION, ELIGIBILITY, PLAN DEVELOPMENT, SERVICE DATA, AND EVALUATE EMPLOYMENT OUTCOMES FOR ALL CUSTOMERS AND UNDERSERVED POPULATIONS BY 9/30/2015**

**OBJECTIVE 1:** ORS Counselors, Supervisors, and Administrators will be able to obtain accurate and timely reports about population-specific admissions, status time frames, and services.

**STRATEGIES:**

- Identify ORS needs for tracking special populations, such as specific adult, in-school/out-of-school transition, minority and underserved population data
- Work with Libera to program necessary changes into the Case Management System (System 7/MIS)
- Ensure that ORS has necessary report capacity for staff, supervisors, and administrators to monitor service delivery and status changes
- Provide ongoing training to and monitoring of staff on timely eligibility determination, timely plan development, and case flow as elements of tracking, best practices, and quality service provision
- Develop increased capacity to capture "special populations" (ie. individuals with significant intellectual disabilities, individuals within the Pervasive Developmental Disorder spectrum (specifically Asperger's Syndrome), RI Works, transition, SSDI/SSI beneficiaries etc.)

**EVALUATION CRITERIA:**

- Ensure that ORS has the information needed for customer tracking, program evaluation, monitoring, and service delivery adjustments
- Supervisors and Administrators will analyze MIS adjustments to ensure that tracking and monitoring needs of staff, supervisors, and Administrators are met

**EVALUATION PLAN:**

- By 9/30/2015, these elements will provide data for testing and monitoring
- By 9/30/2015, counselors, staff, supervisors, and administrators will be able to track admission, service and employment data for all customers by special population category, services provided, caseload, region, and agency

**OBJECTIVE 2:** ORS will develop and implement a mechanism to evaluate the quality of each job placement based on hours of employment per week, hourly earnings, and health insurance/benefits

**STRATEGIES:**

- Enlist Technical Assistance in the research, development, and implementation of a mechanism as part of Continuous Quality Improvement
- Identify data elements for inclusion and adjust/refine to capture elements at closure in MIS
- Utilize 2011 employment indicators as baseline data
- Review RI wages, hours worked, and health insurance/benefits data available through the State of RI DLT, as well as through the Bureau of Labor Statistics
- Monitor development on a monthly basis and adjust strategies as needed to ensure implementation
- Use of System 7 by supervisory personnel to obtain monthly employment closure data and to monitor closure information in MIS for accuracy and completeness
- Educate staff about information being gathered, counselor role in the process, and the purpose of this mechanisms' implementation
- Analyze data on a quarterly basis by supervisors and administrator to identify employment trends and adjust service delivery strategies as needed
- Identify training needs based on clinical supervision and findings
- Provide quarterly feedback to supervisory staff for inclusion in clinical supervision and to the Training Coordinator for development of the staff training calendar

#### **EVALUATION CRITERIA:**

- Test system to ensure that ORS has information needed for customer tracking, progress evaluation, and monitoring
- Gather monthly data and assess, if required, information is being obtained
- Modify plan, timelines, and objectives, as needed

#### **EVALUATION PLAN:**

- By 6/30/15, ORS will have the capacity to capture defined elements of quality employment outcomes in terms of hours/week, hourly earnings, and health insurance/benefits

- By 7/31/15, counselors, staff, supervisors, and administrators will generate reports about quality employment outcomes by caseload, region and agency
- By 9/30/15, a schedule will be established and implemented by the CQI committee for review of data and adjustments in staff training topics and schedule, supervision, and/or support

**OBJECTIVE 3:** Modify and implement a service-delivery system that reinforces quality employment outcome indicators for adult, transition-aged youth, minority populations, and underserved populations

**STRATEGIES:**

- Educate and train staff, customers, and CRPs to increased expectations by ORS of quality indicators to consider in job placement and self-employment
- Assess the impact of a fee-for-service structure that reinforces and rewards placement activities that are based on number of hours worked per week, at an hourly wage above prevailing wage, and health insurance/benefits
- Ensure that the needs of all customers, minority and underserved populations are evaluated via satisfaction surveys, CNA activities, counselor, and CRP feedback, and selected program evaluation activities
- Coordinate staff resources to appropriately respond to underserved and minority populations in collaboration with the SRC Outreach and Transition Subcommittees, agency Workforce Development Task Group, as well as local Chambers of Commerce
- Increase the number of customers active with ORS who obtain an employment outcome and identify themselves as an underserved population or minority population
- Increase the number of individuals with physical disabilities who receive services from ORS and obtain a quality employment outcome
- Ensure that Cultural Competence training opportunities are provided to Rehabilitation Counselors
- Enhance the service delivery system and partnerships with other state and private providers in order to address the integrated competitive employment outcome expectations for adults and youth with developmental disabilities, including significant intellectual disabilities
- Identify and conduct focus groups with the community stakeholders of respective underserved populations for input on outreach and service delivery

- Tailor marketing strategies and brochures, as needed, to respective populations
- Integrate business relationships through the newly formed Workforce Development Task Group
- Increase rehabilitation counselor knowledge about business needs, and create an ORS cadre of Business Relation Ambassadors
- Reinforce use of benefits counseling as a means of informed choice throughout the rehabilitation process with SSI/SSDI recipients, CRPs, support staff, parents and youth with disabilities, and guardians
- Adjust the referral, assessment, engagement, and service delivery activities for RIWorks customers, transition-aged youth, minority and underserved populations, as appropriate and necessary
- Network with employers, netWORKri, and Workforce Investment Boards to identify labor market trends, employers' needs, and the skill set needed to fill job vacancies in order to provide qualified employees to businesses
- Enlist the Workforce Development Supervisor and Business Relation Ambassadors to bridge the connections between ORS and the business community by informing counselors about current job openings, State/Federal job openings, and labor market trends
- Ensure Rehabilitation Counselors have knowledge about educational and training options, as well various placement incentives, in order to enhance quality employment outcomes
- Provide current information to customers about the local labor market, employer needs, and associated educational/training opportunities
- Examine effective models of service delivery for specific customer populations
- Utilize and monitor outcome ratio for minority and underserved populations, which provide information on current service levels, the need for expanded or new CRP services, and potential emerging minority populations

#### **EVALUATION CRITERIA:**

- Meet Standard One for increasing the number of successful employment closures annually
- Increase average competitive wage (Indicator 1.5) in FFY2015 from the baseline FFY2011 wage of \$10.89

- Increase average hours worked in FFY2015 from the baseline of FFY2011 hours of 26.6
- Decrease homemaker outcomes in FFY2015 from the baseline FFY2011 rate of 2.33% or 17
- Increase the number of customers in FFY2015 who exit with employment-related health benefits from FFY2011 baseline of 52 or 7.3%
- Increase average competitive wage (Indicator 1.5) in FFY2015 for transition customers from the baseline FFY2011 transition wage of \$ 9.39
- Compare the post high school outcomes using Indicator 14 for transition youth who participated in contracted Educational Collaboratives vocational evaluations in 2008
- Increase the number of transition-aged customers in FFY2015 who exit with employment related health benefits from FFY2011 baseline of 16 or 5.59%
- Meet Standards & Performance Indicator 2.1 on a quarterly basis
- Monitor quality and outcomes of customer services provided by minority-oriented CRPs, including those that offer training, job development, placement, and retention on a quarterly basis
- Compare admission, length of time engaged, and employment outcomes for specific minority and underserved populations against data from FFY2012 and FFY2013

#### **EVALUATION PLAN:**

- By 9/30/15 ORS will have the capacity to utilize the CQI data to make decisions around adjustments to service delivery practices

This screen was last updated on May 2 2014 11:00AM by Sharon Dipinto



## **Attachment 4.11(c)(3) Order of Selection**

- Identify the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services.
- Identify the justification for the order.
- Identify the service and outcome goals.
- Identify the time within which these goals may be achieved for individuals in each priority category within the order.
- Describe how individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

### **Justification for order of selection**

The current Order of Selection is expected to continue from FFY2014 through FFY2015, thereby allowing the Rhode Island Office of Rehabilitation Services (ORS) to serve all eligible individuals with the most significant disabilities as designated under OOS Category 1. In order to meet the need for rehabilitation services and to provide high-quality employment outcomes, ORS will continue to monitor the current priority classification within the Order of Selection, and adjust as necessary. All customers with Individualized Plans for Employment (IPE) are individuals with the most significant and significant disabilities. These individuals require multiple services over an extended time.

The Order of Selection consists of the following three categories:

1. Individuals with the most significant disabilities
2. Individuals with significant disabilities
3. All other individuals with disabilities who cannot be classified in a higher category

The Order of Selection does not discriminate against any person by type of disability, economic status, race, color, national origin, disability, political beliefs, sexual orientation, age, religion, sex, or protected class.

### **Description of Priority categories**

The Code of Federal Regulations CFR361.5 Applicable Definitions, (30) and (31) (i), (ii), (iii) defines an individual with the most significant disability in the following manner:

"An individual who has a severe physical or mental disability that seriously limits three or more functional capacities (mobility, communication, self-care, self-

direction, interpersonal skills, work tolerance, or work skills) in terms of employment outcome, and

whose vocational rehabilitation is expected to require multiple VR services over an extended period of time, and

who have one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorder, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia, other spinal cord conditions, sickle cell anemia, specific learning disabilities, end-stage renal disease, or from another disability or combination of disabilities, which based on an assessment for determining eligibility and vocational rehabilitation needs, causes comparable substantial functional limitations."

### **Priority of categories to receive VR services under the order**

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals in Category 1 with the most significant disabilities. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to prepare for and engage in gainful employment in an integrated setting.

ORS notifies all individuals that do not meet the current Order of Selection and provides them with information and referral services to assist them with preparation for obtaining employment and related services.

Individuals are reassessed when additional information relevant to OOS is received subsequent to a classification decision. Requests for post-employment services are not subject to Order of Selection.

### **Service and outcome goals and the time within which the goals will be achieved**

Projections for numbers to be served in FFY2015 are based on recent performance: Order of Selection (OOS) Category 1 = 4,203; and Order of Selection (OOS) Category 2 = 185. The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual's informed career choice that has evolved from information about skills, interests, preferences, abilities and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that

choice and the specific services/interventions needed by the individual to reach that employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal. Quantifying the length of time an individual is active with ORS is difficult as the necessary services, duration, and outcome is individualized to the needs of each customer.

Priority Category	Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Estimated number of individuals who will exit without employment after receiving services	Time within which goals are to be achieved	Cost of services
1	4,203	566	400	29	\$20,720,790
2	185	38	31	26	\$1,073,740

This screen was last updated on May 2 2014 11:02AM by Sharon Dipinto

## **Attachment 4.11(c)(4) Goals and Plans for Distribution of Title VI , Part B Funds**

Specify the state's goals and priorities with respect to the distribution of funds received under section 622 of the Act for the provision of supported employment services.

Title VI, Part B continues to provide \$300,000 of federal funding annually. ORS uses these funds to assist the most significantly disabled populations through carefully-crafted, individually-planned supported employment services. These services are provided through a partnership between the Rhode Island Office of Rehabilitation Services (ORS) and a number of Community Rehabilitation Providers (CRPs) on a fee-for-service basis.

Due to the ongoing ramifications of RI State budget cuts from the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) to CRP agencies, ORS's ability to exercise informed choice with clients was compromised by limited CRP options due to personnel and services restrictions of CRPs. In FFY 2013, in collaboration with CRPs, providers, BHDDH, ORS staff and Administrators, ORS developed a new Supported Employment (SE) Fee-for-Service model with an array of new services and incentives for Quality Employment Outcomes. In FFY 2015, the impact of employment outcomes of these changes will continue to be monitored.

### **STATE'S GOALS AND PRIORITIES**

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Standards and Performance Indicators, monitoring reviews, quality improvement findings and feedback from customers, advocates and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

ORS goals for FFY2015 are as follows:

- Utilize orientation groups, literature distribution about the agency, presence at the Supported Employment CRPs, netWORKri One-Stop and Youth Centers, and participation in resource education events around the state to enhance supported employment referrals
- Critique and refine, when needed, the application process to ensure that it is easily accessible and responded to by agency personnel in a timely manner

- Explore methods to maintain involvement of adults and transition-aged populations in Supported Employment via analysis of closure statuses and feedback from staff, vendors, families, support staff, and customers
- Develop, implement, and monitor strategies to meet timely eligibility determination, plan development standards, and case flow standards for individuals requiring Supported Employment
- Ensure that travel competency and transportation issues are addressed and initiated as a core employment skill and incorporated into Supported Employment IPEs
- Provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to individuals receiving Supported Employment and their families, CRPs, support staff and ORS staff in order to support informed choice and employment
- Monitor and adjust new patterns of Supported Employment service delivery in response to the changing needs of ORS customers
- Educate Supported Employment customers, adult and youth, to the importance of labor market information (LMI), training options, self-advocacy, work experience, self employment, references, volunteering, on-the-job training, resume building, and educational opportunities to increase the likelihood of a quality employment outcome
- Encourage youth participation in statewide transition activities and disability forums with a focus on supported employment in integrated competitive settings
- Enhance summer work experiences for out-of-school transition-aged youth receiving supported employment with direct placement with an employer providing prevailing wage
- Establish Supported Employment pilot projects with local education authorities, CRPs, One Stop Centers, Youth Centers, and the business community to create more responsive and innovative approaches to assessment, placement, training and job retention
- Provide transition services from Services for the Blind and Visually Impaired (SBVI) Social Service Program to the SBVI Vocational Rehabilitation Program to ensure that youth with visual impairments have a smooth transition towards employment and access to Supported Employment services
- Adapt and adjust Supported Employment service delivery as trends and needs are identified from customer feedback, CQI activities and best practices

- Partner with supported employment providers to implement Employment First and Recovery principles into service delivery in order to increase expectations that individuals with significant intellectual and psychiatric disabilities can obtain quality employment outcomes in integrated settings at competitive wages
- Develop more options for long-term support models including natural support options and post-employment support services for individuals needing Supported Employment services
- Examine the BHDDH Options program as a resource for long-term supports

**Identify what outreach procedures will be effective to provide Supported Employment rehabilitation services to a diverse population of emerging, unserved and underserved individuals such as minorities, including those with the most significant disabilities; individuals with significant intellectual disabilities; and other individuals with disabilities who have been under-represented within the VR program.**

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to expand and improve services for individuals with disabilities who are minorities for FFY2015 are as follows:

- Utilize and monitor outcome ratios for minority populations that utilize Supported Employment which provide information on current service levels, the need for expanded or new Supported Employment CRP services, and potential emerging minority populations who need Supported Employment Services
- Outreach to college disability services, high schools, Rhode Island's Youth Councils and youth-oriented community providers in order to identify and engage youth with disabilities and/or from underserved cultural backgrounds who need or receive Supported Employment services
- Review and analyze needs of minority and underserved populations who utilize Supported Employment, in order to develop capacity and expand CRP network ability to competently provide Supported Employment services that result in increased quality employment outcomes
- Ensure all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages) or alternate formats as needed
- Ensure partnership with the new SRC Outreach Subcommittee as a resource in planning and development of Supported Employment services to minority, intellectual disabilities, developmental disabilities, and underserved populations

- Coordinate the outreach and marketing efforts of the SRC Outreach Committee and the agency Workforce Development Task Group to coordinate strategies to engage individuals in the minority or underserved population who need Supported Employment Services
- Establish new and innovative SE strategies to maintain ORS involvement with in-school youth with disabilities and with young adults who are no longer in school

**If applicable, identify plans for establishing, developing, or improving community rehabilitation programs within the state.**

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to expand and improve Supported Employment community rehabilitation programs in RI for FFY2015 are as follows:

- Provide leadership and a Supported Employment fee structure that reinforces indicators of quality employment outcomes
- Provide instruction in the Certified Case Management Training Program of the CRP Community Mental Health Centers on the importance of employment as critical to a recovery model of service and the Vocational Rehabilitation Program as an employment resource for individuals needing Supported Employment
- Re-establish liaison relationships with Supported Employment CRPs who have expertise in serving minority, underserved to include intellectually disabled populations, as well as other populations, to ensure access to Supported Employment Services, training programs, and quality employment outcomes
- Address equal access issues by ensuring that the CRP network and Supported Employment program is responsive to cultural and language diversity issues of current and future customers
- Encourage cultural competency among the Supported Employment CRP network, as well as requiring partners to provide accessible Supported Employment services
- Ensure Supported Employment training programs and CRP services are gender neutral and available to all qualified customers regardless of age, race, and national origin and to universal access to their services
- Recruit additional resources to expand Supported Employment service options for youth with Sensory Impairment

- Enlist community mental health centers and developmental disability organizations to increase the number of customers obtaining and maintaining competitive integrative employment
- Provide Supported Employment CRP providers with best practice training and professional development through ongoing communication and structured learning opportunities
- Participate with both the Developmental Disabilities Supported Employment and Behavioral Health Supported Employment Council Meetings
- Work in partnership with TACE to provide training to Supported Employment CRPs

**Describe strategies to improve the performance of the state with respect to the evaluation standards and performance indicators.**

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to improve Standards and Performance Indicators for FFY2015 are as follows:

- Implement and refine a system for monitoring, evaluating and providing timely information about Supported Employment services for staff and administration about ORS' movement toward accomplishment of goals identified in the State Plan
- Monitor, report and establish corrective actions to agencies' movement toward meeting Standards and Performance Indicators for Supported Employment services
- Maintain annual development of a Continuous Quality Improvement Plan that on a monthly basis evaluates agency Supported Employment services and outcomes in order to meet the goals and objectives of the State Plan
- Update Continuous Quality Improvement Plan (CQI) on an annual basis, ensuring inclusion of data regarding Supported Employment services from the quarterly reviews of the CQI plan, activities, CNA, and State Plan goals
- Educate staff about Continuous Quality Improvement in relationship to Supported Employment services to assure quality employment outcomes for individuals receiving SE services

**Describe strategies for assisting other components of the statewide workforce investment system in assisting individuals with disabilities who utilize Supported Employment services.**

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to assist components of the Workforce Investment Board (WIB) in assisting individuals



with disabilities needing Supported Employment services for FFY2015 are as follows:

- Partner via the Workforce Development Supervisor and the Workforce Development Task Group with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Woman's Business Enterprise, Supported Employment CRP network, and Minority Business Enterprise trade organizations
- Identify labor market trends and business needs as an element of vocational guidance and counseling, career planning, Supported Employment services and IPE development
- Participate on the two existing WIBs covering Providence/Cranston and Greater RI areas and their Youth Sub-committees
- Develop a Supported Employment services system collaboration pilot project with DLT Youth Centers
- Develop marketing materials that showcase employment successes and cultivate awareness and interest in ORS as a workforce resource to local businesses
- Review RFPs of Rhode Island's two Workforce Investment Boards, Youth Councils, and Youth Centers and advocate strategies for the inclusion of youth with disabilities who receive Supported Employment services in the Governor's Workforce Investment initiatives
- Maintain ORS presence at each of the netWORKri sites and enlist One-Stop Youth Centers and Supported Employment CRP network as necessary

**Describe how the agency's strategies will be used to:**

- achieve goals and priorities identified in Attachment 4.11(c)(1);
- support innovation and expansion activities; and
- overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the state Vocational Rehabilitation Services Program and the state Supported Employment Services Program.

The Rhode Island Office of Rehabilitation Services' (ORS) will implement the following program development strategies and utilize Innovation and Expansion (I & E) funds during FFY2015 based on the needs identified in the Statewide Comprehensive Needs Assessment, ORS' Goals and Priorities, and ORS'

commitment to serving individuals with the most significant disabilities who are minorities and underserved population, while ensuring equal access to Vocational Rehabilitation and Supported Employment services:

- Develop the capacity, via work with System 7, to accurately track application, service, and employment data for all adult and all transition-age customers between the ages of 14-24, supported employment customers, and other underserved populations. Gathering this data at critical junctures in the rehabilitation process will ensure ORS staff and administration are able to monitor service delivery, timely eligibility determination, timely plan development, and case flow as elements of quality service, best practice, and competent service provision
- Develop and implement a method to evaluate employment outcomes of both adult and transition-aged youth
- Include access to Technical Assistance as part of the Continuous Quality Improvement Plan, which will enable ORS to analyze data on a quarterly basis against FFY2011 baseline data and adjust strategies as needed. Supervisory staff will analyze closure data and monitor information in MIS for accuracy and completeness
- Increase quality employment outcomes through increased expectations of hours per week of employment, hourly wage, and health insurance/benefits as critical indicators of a quality job placement or self-employment. ORS has developed and implemented a fee structure that reinforces placement outcomes for general and supported employment customers that meet or exceed criteria for quality employment indicators
- Examination of different service-delivery models for the specialized needs of targeted populations will also be a consideration in attaining quality employment outcomes. ORS plans to enlist technical assistance to better engage youth with disabilities with a 504 plan and to develop patterns of service that reflect changing needs of transition-age youth
- Increase the number of minority and underserved populations who participate in services and who obtain quality employment outcomes by cultivating CRPs to meet the needs identified in the Comprehensive Needs Assessment. ORS plans to increase its ability to better monitor outcomes ratio for minority and underserved populations and to establish outreach strategies to engage Southeast Asian, African American, individuals with physical disabilities, developmental disabilities, significant intellectual disabilities, and individuals within the Pervasive Developmental Disorder spectrum, specifically Asperger's Syndrome
- Build capacity to provide appropriate individualized services to individuals with significant physical disabilities

- Outreach will be provided by ORS staff to underserved and minority populations in collaboration with the new SRC Outreach and Transition Subcommittee, agency Workforce Development Task Group, and Self-Employment Committee
- Cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Aspergers and Autism, and individuals with sensory impairments
- Utilize I&E funds to support the projects of the State Rehabilitation Council (SRC), to orient and train new members of the SRC, and support a Strategic Planning Day for the SRC
- Develop the State Plan by the SRC and ORS, as well as the Statewide Comprehensive Needs Assessment, through I & E funds
- Establish and implement Project Search in partnership with Providence School System, a vendor, and Behavioral Health Developmental Disabilities & Hospitals
- Develop an evaluation template to assess the effectiveness of agency pilot
- Participate in developing services specific to the needs of individuals with significant intellectual disabilities
- Implement four pilot projects targeting underserved and minority populations' identified through the CNA:
  - i. Partner with several local high schools, a vendor, and ORS to target 10 youth with disabilities for intensive job preparation training, after-school career & work experience programming to prepare for transition after high school
  - ii. Replicate an intensive employment preparation program for adults with Aspergers which includes environmental coaching, training in social and communication skills, and real work experiences leading to employment and/or training success
  - iii. Establish additional pilot projects around the state that use a team approach to address the myriad of support needs of customers enrolled in ORS and the RI Works (TANF) program in order to realize an employment outcome
  - iv. Design and implement pilot project in collaboration with RI Department of Labor & Training youth center in South County for in school youth as they transition out of school to adult services

This screen was last updated on May 2 2014 12:35PM by Sharon Dipinto

## Attachment 4.11(d) State's Strategies

This attachment should include 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 vocational rehabilitation and the supported employment programs. (See sections 101(a)(15)(D) and (18)(B) of the Act and Section 427 of the General Education Provisions Act (GEPA)).

Describe the methods to be used to expand and improve services to individuals with disabilities.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to expand and improve services for individuals with disabilities for FFY2015 are as follows:

- Utilize orientation groups, literature distribution about the agency, presence at the netWORKri One-Stop Centers, and participation in resource education events around the state to enhance referrals
- Critique and refine, when needed, the application process to ensure that it is easily accessible and responded to by agency personnel in a timely manner
- Explore methods to maintain involvement of adults and transition-aged populations via analysis of closure statuses and feedback from staff, vendors, families, and customers
- Develop, implement, and monitor strategies to meet timely eligibility determination, plan development standards, and case flow
- Ensure that travel competency and transportation issues are addressed and initiated as a core employment skill and incorporated into IPE
- Provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment
- Monitor and adjust new patterns of service delivery in response to the changing needs of our ORS customers
- Work with the SRC, the Workforce Development Task Group, and ORS staff on development of a CNA focus for FFY2014 with the intention of implementation during 2015
- Educate customers, adult and youth, to the importance of labor market information (LMI), training options, self-advocacy, work experience, self employment, references, volunteering, on-the-job training, resume

building, and educational opportunities as variables that increase the likelihood of a quality employment outcome

- Encourage youth participation in statewide transition activities and disability forums
- Enhance summer work experiences for out-of-school transition-aged youth with direct placement with an employer providing prevailing wage
- Establish pilot projects with local education authorities, One-Stop and Youth Centers, and the business community to create more responsive and innovative approaches to assessment, placement, training, and job retention
- Provide transition services from Services for the Blind and Visually Impaired (SBVI) Social Service Program to the SBVI Vocational Rehabilitation Program to ensure that youth with visual impairments have a smooth transition towards employment
- Adapt and adjust service delivery as trends and needs are identified from customer feedback, CQI activities, and best practices
- Partner with supported employment providers to implement Employment First and Recovery principles into service delivery in order to increase expectations that individuals with significant disabilities and psychiatric disabilities can obtain quality employment outcomes in integrated settings at competitive wages
- Develop more options for long-term support models including natural support options and post-employment support services
- Examine the BHDDH "Options Program" as a resource for long-term supports

Identify how a broad range of assistive technology services and assistive technology devices will be provided to individuals with disabilities at each stage of the rehabilitation process; and describe how assistive technology services and devices will be provided to individuals with disabilities on a statewide basis.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to provide assistive technology services/devices for individuals with disabilities for FFY2015 are as follows:

- Improve procedures to expedite customer access to try out on a loan basis AT devices and services

- Enlist SBVI Rehabilitation Teacher to assess individuals' level of ability to utilize AT for their specific needs
- Educate employers, Rehabilitation Counselors, ORS vendors, and customers about assistive technology resources such as the Assistive Technology Access Partnership Program (ATAP), specifically the AT loan opportunities as a resource for making informed choice and more appropriate purchasing decisions
- Incorporate access to and acquisition of assistive technology, evaluations, mobility assessment and training, SSA, Work Incentive information, and self-advocacy skills as core services for adults and youth with disabilities
- Ensure that on an annual basis, the ATAP program, in partnership with the ATAP Director, Training Coordinator, and Transition Supervisor, will provide AT information to Rehabilitation Counselors
- Increase staff and CRPs knowledge about accommodations, ergonomics, best practices, and assistive technology resources throughout the rehabilitation process via participation in training on AT
- Increase linkages between the Assistive Technology Access Partnership (ATAP) resources, existing rehabilitation technology contractors, and Rehabilitation Counselors to ensure that assistive technology needs are considered prior to assessments/evaluations that lead to evidence based IPE development and customer services on a statewide basis throughout each stage of the rehabilitation process
- Provide leadership in conjunction with ATAP to sponsor annual AT Conference attended by over four hundred professionals and individuals with disabilities

Identify what outreach procedures will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities; and what outreach procedures will be used to identify and serve individuals with disabilities who have been unserved or underserved by the VR program.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to expand and improve services for individuals with disabilities who are minorities for FFY2015 are as follows:

- Utilize and monitor outcome ratios for minority populations which provide information on current service levels, the need for expanded or new CRP services, and potential emerging minority populations

- Outreach to college disability services, high schools, Rhode Islands Youth Councils and youth-oriented community providers in order to identify and engage youth with disabilities and/or from underserved cultural backgrounds
- Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes
- Ensure all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternated formats, as needed
- Ensure partnership with the SRC Outreach Subcommittee as a resource in planning and development of services to minority, intellectual disabilities, and underserved populations
- Coordinate the outreach and marketing efforts of the agency on the SRC Outreach Committee and the agency Workforce Development Task Group/Marketing Committee to develop and coordinate a strategy for outreach
- Establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities and youth adults who are no longer in school
- Provide in-service training on cultural sensitivity and competence, including instruction on use of interpreters and the The Big Word, etc.
- Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome

If applicable, identify plans for establishing, developing, or improving community rehabilitation programs within the state.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to expand and improve community rehabilitation programs in RI for FFY2015 are as follows:

- Provide leadership and a fee structure that reinforces indicators of quality employment outcomes
- Provide instruction in the Certified Case Management Training Program of the CRP Community Mental Health Centers on the importance of employment as critical to a recovery model of service and the Vocational Rehabilitation Program as an employment resource



- Re-establish liaison relationships with CRPs who have expertise in serving minority, underserved, and intellectually disabled populations to ensure access to services, training programs, and quality employment outcomes
- Address equal access issues by ensuring that the program is responsive to cultural and language diversity issues of current and future customers
- Encourage cultural competence among the CRP network as well as requiring partners to provide accessible services
- Ensure training programs and CRP services are gender neutral and available to all qualified customers regardless of age, race, and national origin and to universal access to their services
- Recruit additional resources to expand service options for youth with Sensory Impairment
- Enlist community mental health centers and developmental disability organizations to increase the number of customers obtaining and maintaining competitive integrative employment
- Provide Supported Employment CRP providers with best practice training and professional development through ongoing communication and structured learning opportunities
- Participate with the Developmental Disabilities and Mental Health Supported Employment Council Meetings
- Work in partnership with TACE to provide training to CRPs

Describe strategies to improve the performance of the state with respect to the evaluation standards and performance indicators.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to improve Standards and Performance Indicators for FFY2015 are as follows:

- Implement and refine a system for monitoring, evaluating and providing timely information for staff and administration about ORS' movement toward accomplishment of goals identified in the State Plan
- Monitor, report, and establish corrective actions to agency's movement toward meeting Standards and Performance Indicators
- Monitor agency performance on Standard 2.1, Minority Ratio to Non-Minority Service Rate Ratio, by Strategic Planning Supervisor, administrative team, and Workforce Development Task Group/Marketing Committee

- Maintain annual development of a Continuous Quality Improvement Plan that on a monthly basis evaluates agency services and outcomes in order to meet the goals and objectives of the State Plan
- Update Continuous Quality Improvement Plan (CQI) on an annual basis, ensuring inclusion of data from the quarterly reviews of the CQI plan, activities, CNA, and State Plan goals
- Educate staff about the role of Continuous Quality Improvement in relationship to quality outcomes

Describe strategies for assisting other components of the statewide workforce investment system in assisting individuals with disabilities.

The Rhode Island Office of Rehabilitation Services' (ORS) strategies to assist components of the WIB in assisting individuals with disabilities for FFY2015 are as follows:

- Partner via the Workforce Development Supervisor and the Workforce Development Task Group, with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women's Business Enterprise, and Minority Business Enterprise trade organizations
- Identify labor market trends and business needs as an element of vocational guidance and counseling, career planning, and IPE development
- Participate on the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Subcommittee
- Develop a system change pilot project with DLT Youth Centers
- Develop marketing materials that showcase employment successes and cultivate awareness and interest in ORS as a workforce resource to local businesses
- Review RFPs of Rhode Island's two Workforce Investment Boards, Youth Councils, and Youth Centers; and advocate strategies for the inclusion of youth with disabilities in the Governor's Workforce Investment initiatives
- Maintain ORS presence at each of the netWORKri sites and enlist One-Stop Youth Centers as necessary
- Cultivate development of business partnerships through a closer linkage between the Workforce Development Supervisor, the SRC Outreach Sub-

Committee, the agency Workforce Development Task Group, and the Business Advisory Council

Describe how the agency's strategies will be used to:

- achieve goals and priorities identified in Attachment 4.11(c)(1);
- support innovation and expansion activities; and
- overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the state Vocational Rehabilitation Services Program and the state Supported Employment Services Program.

The Rhode Island Office of Rehabilitation Services' (ORS) will implement the following program development strategies and utilize Innovation and Expansion (I & E) funds during FFY2015 based on the needs identified in the Statewide Comprehensive Needs Assessment, ORS' Goals and Priorities, and ORS' commitment to serving individuals with the most significant disabilities who are minorities and underserved population, while ensuring equal access to Vocational Rehabilitation and Supported Employment services:

- Develop the capacity, via work with System 7, to accurately track application, service, and employment data for all adult and all transition-age customers between the ages of 14-24, supported employment customers, and other underserved populations. Gathering this data at critical junctures in the rehabilitation process will ensure ORS staff and administration are able to monitor service delivery, timely eligibility determination, timely plan development, and case flow as elements of quality service, best practice, and competent service provision
- Develop and implement a method to evaluate employment outcomes of both adult and transition-aged youth
- Include access to Technical Assistance as part of the Continuous Quality Improvement Plan, which will enable ORS to analyze data on a quarterly basis against FFY2011 baseline data and adjust strategies as needed. Supervisory staff will analyze closure data and monitor information in MIS for accuracy and completeness
- Increase quality employment outcomes through increased expectations of hours per week of employment, hourly wage, and health insurance/benefits as critical indicators of a quality job placement or self-employment. ORS has developed and implemented a fee structure that reinforces placement outcomes for general and supported employment customers that meet or exceed criteria for quality employment indicators
- Examination of different service-delivery models for the specialized needs of targeted populations will also be a consideration in attaining quality

employment outcomes. ORS plans to enlist technical assistance to better engage youth with disabilities with a 504 plan and to develop patterns of service that reflect changing needs of transition-age youth

- Increase the number of minority and underserved populations who participate in services and who obtain quality employment outcomes by cultivating CRPs to meet the needs identified in the Comprehensive Needs Assessment. ORS plans to increase its ability to better monitor outcomes ratio for minority and underserved populations and to establish outreach strategies to engage Southeast Asian, African American, individuals with physical disabilities, developmental disabilities, significant intellectual disabilities, and individuals within the Pervasive Developmental Disorder spectrum, specifically Asperger's Syndrome
- Build capacity to provide appropriate individualized services to individuals with significant physical disabilities
- Outreach will be provided by ORS staff to underserved and minority populations in collaboration with the new SRC Outreach and Transition Subcommittee, agency Workforce Development Task Group, and Self-Employment Committee
- Cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Aspergers and Autism, and individuals with sensory impairments
- Utilize I&E funds to support the projects of the State Rehabilitation Council (SRC), to orient and train new members of the SRC, and support a Strategic Planning Day for the SRC
- Develop the State Plan by the SRC and ORS, as well as the Statewide Comprehensive Needs Assessment, through I & E funds
- Establish and implement Project Search in partnership with Providence School System, a vendor, and Behavioral Health Developmental Disabilities & Hospitals
- Develop an evaluation template to assess the effectiveness of agency pilot
- Participate in developing services specific to the needs of individuals with significant intellectual disabilities
- Implement four pilot projects targeting underserved and minority populations' identified through the CNA:

i. Partner with several local high schools, a vendor, and ORS to target 10 youth with disabilities for intensive job preparation training, after-school career & work experience programming to prepare for transition after high school

ii. Replicate an intensive employment preparation program for adults with Aspergers which includes environmental coaching, training in social and communication skills, and real work experiences leading to employment and/or training success

iii. Establish additional pilot projects around the state that use a team approach to address the myriad of support needs of customers enrolled in ORS and the RI Works (TANF) program in order to realize an employment outcome

iv. Design and implement pilot project in collaboration with RI Department of Labor & Training youth center in South County for in school youth as they transition out of school to adult services

This screen was last updated on May 19 2014 10:53AM by Sharon Dipinto

# Attachment 4.11(e)(2) Evaluation and Reports of Progress

## Vocational Rehabilitation (VR) and Supported Employment (SE) Goals

1. Clearly identify all VR program goals consistent with the goals described in the FY 2013 Attachment 4.11(c)(1), including an evaluation of the extent to which the VR program goals were achieved.

- Identify the strategies that contributed to the achievement of the goals.
- Provide a description of the factors that impeded the achievement of the goals and priorities.

### EVALUATION OVERVIEW:

The State Plan for FFY2014 incorporated tracking of admission, service, and employment outcome goals for general, transition, underserved, and supported employment customers in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs. Several new initiatives, fee structure adjustments, and expanded training programs have been developed in response to our data analysis; C.N.A.; and feedback from our customers, vendors, and staff.

### GOAL 1: TO INCREASE QUALITY EMPLOYMENT OUTCOMES VIA DATA COLLECTION, TRACKING AND ANALYSIS OF JOB PLACEMENTS BY DEVELOPING INNOVATIVE SERVICE DELIVERY OPTIONS TO ADDRESS THE NEEDS OF ORS CUSTOMERS

#### A. ACTUAL EMPLOYMENT OUTCOMES:

##### FFY 2012

- Successful Closures Total: 602; Successful Transition Closures: 242;  
Successful Minority/Underserved: 181

**FFY 2013** - Successful Closures Total: 603; Successful Transition Closures: 225;  
Successful Minority/Underserved: 191

**Variance** - Successful Closures Total: +1; Successful Transition Closures: -17;  
Successful Minority/Underserved: +10

#### B. SERVICE DELIVERY OPTIONS:

- ORS reinstated orientation meetings in August 2012 in an effort to increase visibility in the community and referrals to the agency. Three statewide meetings are scheduled: (1) one in Providence on the first Tuesday of every month; (2) one in West Warwick on the first Thursday of every month; and

(3) a Providence based group specific for individuals who are Deaf and Hard of Hearing on the the first Thursday on the month. These three monthly groups averaged between three and four participants. In addition, ORS reinstated the monthly orientation at Butler Hospital Outpatient, a psychiatric hospital that serves patients state-wide, which averages more than 5 participants per month. The number of participants in the Orientation Groups has tended to be less than 5 per group, yet overall referrals to the agency have increased over the past year. An examination of the cost benefit of continuing to offer the Orientation Groups will be explored and adjusted as indicated.

- Since the suspension of the paid customer internship program in 2012, ORS has developed and actively utilized other methods of providing work experiences. The use of Situational Assessments in the Community (SAC) provides an assessment, career exploration, and potential reference for clients. On the Job Evaluations, a partnership between ORS and specific businesses provide up to three months experience in a particular career interest area of the client. The On the Job Evaluation has been vetted through the Department of Human Services' Legal Department and has stringent procedures in place to minimize the risk associated with other work experience models.
- The Agency Workforce Development Supervisor has educated staff regarding the changing needs of the business community, identified resources to assist customers with criminal backgrounds, and oriented customers to the on-line application process for most jobs. The Workforce Development Supervisor and four staff have facilitated 3 interview workshops with 19 participants to help customers become more knowledgeable about and more skillful in the interviewing process. In addition, the Workforce Development Supervisor provides support and critiques of resumes for customers.
- ORS modified a Service Agreement with Rhode Island Department of Education (RIDE) that will identify students with disabilities, IEP, and 504 plans, who are eligible for ORS transition services for the purpose of achieving successful employment outcomes. This document creates the foundation for the ORS transition program at each of the high schools in RI.
- ORS is assisting five educational collaboratives in transitioning from being a contract-based service provider of 220 vocational evaluations per year to

multi-service fee-for-service partners. Meetings with the staff and leadership of each collaborative and ORS have continued as the collaboratives transition from a funding contractor to becoming a provider which develops a business model and the technical expertise to become a comprehensive CRP using a fee-for-service model of reimbursement. Training in job development and technical assistance about the array of services necessary to provide a comprehensive rehabilitation program have been offered to the 5 collaboratives. In addition, on-site financial audits are occurring beginning spring 2014.

- ORS has defined and quantified elements of a quality employment outcome in terms of hours worked per week, hourly earnings, health insurance and benefits and has developed and implemented a fee structure to capture these data elements.
- Over the past year, the Agency has actively pursued enhancing the relationship with the business community through participation in the RI Business Leadership Network (RIBLN) which provided a myriad of educational workshops to employers: disability resources, Job Accommodation Network (JAN), and ORS services. ORS has representation on each of the two Rhode Island Workforce Investment Boards (WIBs), the two Youth Councils of each WIB, as well as MOU's with each of the WIBs. In addition, the Agency Workforce Development Supervisor is the point of contact for federal jobs posted through the National Employment Team (NET). However, the majority of the positions are not in Rhode Island and most ORS customers are reluctant to relocate.
- ORS has sought to reestablish and strengthen the working relationship with the regional Chambers of Commerce. However, staffing changes and shifting priorities have impeded being able to devote staffing resources to this effort.
- A critical component of customer education and career counseling is staff training and clinical supervision. ORS counselors have participated in a number of in-person trainings and on-line trainings designed to reinforce the fundamental principles of the ORS mission, vocational rehabilitation practices, customer service, and quality employment outcomes. These trainings have included areas, such as: supported employment, documentation, eligibility determination, plan development, ADA accommodations, transferable skills analysis, assistive technology, and job



development and job placement activities. These topics provided a basic skill set for the newer counselors and a refresher for the more experienced counselors. This information has directly impacted their vocational activities with the customers as they implemented the new skills that they have learned.

- Counselors have been encouraged to incorporate labor market research, volunteer work, situational assessments, and informational interviews, as well as Ticket to Work and other Social Security Work Incentives, into vocational exploration with the customer in order to support informed choice and career development. With this knowledge, the customer could then choose an appropriate vocational goal based on informed choice, which will help improve the overall quality of their employment outcomes and job retention.
- The WIPA program concluded funding from SSA in June 2012 but was reinstated in August 2013. In addition to the WIPA program, ORS does provide Benefits Counseling to ORS clients through a fee-for-service arrangement with several SSA Certified Benefits Counselors. In addition, a small budget was reserved to conduct sessions about work incentives to non-ORS customers. ORS began implementing monthly Group Benefit Information sessions in 8/2013.
- Many ORS customers rely on reduced rates to afford the use of the public transportation system for travel to and from training, school, and work. Because Rhode Island Public Transportation (RIPTA) was dealing with an increased incidence of fraud in the free and reduced fare programs, RIPTA personnel and ORS staff developed a process that was responsive to the concerns of RIPTA while still maintaining ORS customer access to the service.
- ORS instituted and enhanced services to transition-aged and adult populations, and trained staff in occupational information in an effort to enhance customer knowledge about work, experience with employment, and focus on career development. Transition activities in FFY2013 strengthened services for youth with disabilities. During the summer of 2013, ORS funded a summer work experience for 290 transition-aged youth in order to offer a hands-on paid work experience in the community. Of this number about 55 were youth with intellectual disabilities. The Transition Academies were funded by ORS on a fee-for-service basis to provide work

preparation and employment experiences for youth. In addition, 450 transition-aged youth completed vocational evaluations through the Educational Collaboratives and other fee-for-service providers. ORS collaborated with "Dare to Dream," an initiative focused on employment and empowerment which included 500 students with disabilities from around the state. ORS helped organize the College Forum at Providence College, a program that offers workshops to 100 parents and students on preparation and expectations of secondary educational environments. In March 2014, the agency transition and management staff attended the 2014 2nd Rhode Island Transition Institute where two Administrators and three Supervisors served as facilitators.

- The Self Employment Committee at ORS has evolved into a customer-friendly resource that assists ORS consumers in realizing their self employment vocational goals. The committee's goal is to review the individual's self-employment proposal and to help guide the process to a successful outcome. The Self Employment Committee functions as a technical assistance resource to both the customer and the counselor. The Committee which consists of 5 ORS staff members, who have varying degrees of experience in business ownership and the ORS process, meet to review each proposal. The group determines which path of self employment (Independent Contractor or Business Ownership) is the most appropriate based on each customer's plan. The goal is to discuss and offer feedback including whether more work is needed, recommending that the customer and counselor move towards development of Self Employment plan, and defining services necessary to be successful. Since moving towards a more consumer-counselor friendly approach, the Self Employment Committee has consulted on 9 Self Employment Proposals from 6 different counselors that are in various stages of the employment process.

### **C. CONTINUOUS QUALITY IMPROVEMENT PLAN:**

The Strategic Planning Supervisor, Deputy Administrators of the Vocational Rehabilitation (VR) Program and Services for the Blind and Visually Impaired (SBVI), Assistant Administrator for Vocational Rehabilitation, two Vocational Rehabilitation Supervisors, Human Services Policy & System Specialist, Sr. Word Processing Typist, and Program Assistant II developed, administers, and monitors a Continuous Quality Improvement Plan (CQI) in collaboration with the Quality Assurance/State Plan/Policy sub-committee of the State Rehabilitation Council (SRC). The CQI Plan evaluates and monitors agency concerns in collaboration with the SRC. The focus of the CQI Plan is modified to reflect new areas of study, service delivery processes, needs and concerns identified in the Comprehensive Needs Assessment (CNA). It is updated annually to ensure that

data from quarterly reviews and other evaluation activities are incorporated into the assessment of agency accomplishments.

- Through the use of program management, evaluation, and CQI activities, agency staff at all levels of the organization have participated in and contributed to strategic planning and program evaluation. A structured Customer Satisfaction Survey process is included in the CQI Plan to obtain feedback from customers closed in status 26 and status 28 on a quarterly basis. In FFY 2014 ORS began sending the surveys monthly versus quarterly in the hope of improving the return rates. Aggregate findings are shared with administration, supervisors, and direct service staff. In FFY2013, ORS sent 588 surveys to customers closed employed with a return rate of 21.76% (128 surveys). This represents a 4.46% increase in the return rate over FFY2012. Themes from these surveys suggested the following areas for consideration in service delivery: (1) enhanced focus by ORS on quality employment outcomes, (2) the need to educate customers on life long learning, training, and on-the-job training to enable job keeping and/or advancement, (3) ensure customers' understanding of informed choice in obtaining employment that matches their stated goals and interest, (4) ensure information dissemination to customers of their future ability to access ORS services. Respondents did continue to indicate that they would refer a family member or friend for services.
- Additionally ORS sent 393 satisfaction surveys to customers closed unsuccessfully after receiving services. The return rate of 13.74% (54 surveys) is consistent with FFY 2012. Themes from these surveys included: (1) ensure timely response to receipt of an application, scheduled opportunities to meet and monitor customer movement toward objectives with increased contact at time of plan implementation; (2) inform customers of VR process and services that support their making decisions about goals and needs prior to IPE development; and (3) ensure information dissemination to customers of their future ability to access ORS services if applicable.
- In compliance with the regulatory requirements of 34 CFR 361.29, ORS completed a CNA in the second half of FFY 2013 through first half of FFY 2014 for inclusion in the FFY 2015 State Plan. This process included staff and community surveys; customer satisfaction surveys; meetings with staff; public forums; and review of agency and RSA data and environmental data. The findings of the most recent CNA are included in Attachment 4.11 (a) Statewide Assessment.

- ORS was one of the host agencies for the 6th Annual Vocational Program Evaluation & Quality Assurance Summit held in Providence. The Strategic Planning Supervisor and the Work Force Development Supervisor represented the agency on the planning committee for this event. The Strategic Planning Supervisor is an active participant in the New England VR Program Evaluation and Quality Assurance Group, Summit Group, and the Rehabilitation Program Evaluation Network of the National Rehabilitation Association. Technical Assistance about CQI and program evaluation has been provided through the above entities.

**GOAL 2: TO INCREASE QUALITY EMPLOYMENT OUTCOMES VIA DATA COLLECTION, TRACKING AND ANALYSIS OF JOB PLACEMENTS BY DEVELOPING INNOVATIVE SERVICE DELIVERY OPTIONS TO ADDRESS THE NEEDS OF MINORITY AND UNDESERVED POPULATIONS**

**A. ACTUAL EMPLOYMENT OUTCOMES:**

**FFY 2012**

Successful Closures Total: 602

Successful Minority/Under-served: 181

**FFY 2013**

Successful Closures Total: 603

Successful Minority/Under-served: 191

**Variance**

Successful Closures Total: +1

Successful Minority/Under-served: +10

**B. SERVICE DELIVERY OPTIONS:**

- ORS sought to develop and build strong relationships over the past year with community-based agencies and training programs that demonstrated cultural competence with diverse populations for youths with disabilities and adults. The ORS Cultural Diversity Cadre provided guidance on ensuring equal access by minority communities to ORS services. Bilingual staff helped to increase ORS' capacity to meet the needs of Spanish-speaking customers and other minority and underserved populations. The Rehabilitation Counselors and Case Aide improved the agency capacity to serve minority population, improve service delivery to Spanish-speaking consumers, and assist ORS staff with translation and interpreting needs.

- ORS and the SRC have identified the need to better coordinate its outreach and marketing efforts and have established a new Outreach Committee. The newly-formed committee has representation from the ORS Assistant Administrator of VR, who is also responsible for the intake activity of the agency and participates on the agency Workforce Development Task Group.
- ORS is the primary provider of employment services for RIWORKS (TANF) parents with disabilities. The referral process consists of both an ORS and a TANF/DHS supervisors/staff jointly presenting our programs to RI Works parents. Over the past year, DHS has invited 827 referrals to 43 joint Orientation Meetings of which 395 attended. Of the attendees, 197 applied for services with ORS. RIWorks parents continue to be an underserved population that presents unique obstacles to engagement. The 4-week work readiness program has been quite effective in providing a structure and support to RI Works parents who are moving toward employment.
- Work Readiness and Vocational Assessment, for RIWorks customers, in the outlying areas of the state, has been a challenge. ORS has been exploring different service-delivery models based on the geographic/customer needs of the area. ORS has had difficulty instituting work readiness groups in Woonsocket, Newport, and South County due to the inability to engage a core group of 8 to 10 customers at one time. This presents a cost-effectiveness problem to our venders in providing services.

2. Identify all supported employment program goals consistent with the goals described in Attachment 4.11(c)(4), including an evaluation of the extent to which the supported employment program goals were achieved.

- Identify the strategies that contributed to the achievement of the goals.
- Provide a description of the factors that impeded the achievement of the goals and priorities.

**GOAL 1: TO INCREASE QUALITY EMPLOYMENT OUTCOMES VIA DATA COLLECTION, TRACKING AND ANALYSIS OF JOB PLACEMENTS BY DEVELOPING INNOVATIVE SERVICE DELIVERY OPTIONS TO ADDRESS THE NEEDS OF CUSTOMERS OF SUPPORTED EMPLOYMENT**

**A. ACTUAL EMPLOYMENT OUTCOMES FOR SUPPORTED EMPLOYMENT:**

**FFY 2012**

Successful Supported Employment Closures: 77

Successful Minority and Underserved Closures: 15

**FFY 2013**

Successful Supported Employment Closures: 55

Successful Minority and Underserved Closures: 17

### **Variance**

Successful Supported Employment Closures: -22

Successful Minority and Underserved Closures: +2

### **B. SERVICE DELIVERY OPTIONS:**

- ORS revised its Supported Employment fee structure to provide an array of new services, more specific outcome-based services, and a reimbursement structure with incentives for customers placed in jobs that meet the quality employment outcome criteria on April 1, 2013. Over the past year multiple meetings with providers of Supported Employment have highlighted the challenges of providing quality services to mutual customers at a time of dwindling resources, funding source changes, loss of seasoned personnel, and increased operating expenses. Joint meetings with providers, BHDDH (Behavioral Health Developmental Disabilities and Hospitals), and ORS had sought to identify potential fee structure changes that offered increased flexibility to meet the diverse support and employment needs of SE customers. As a result of this feedback, ORS revised its Supported Employment fee structure and service delivery options with a job placement reimbursement schedule that reinforces quality-employment indicators: number of hours/week, hourly wage, and participation in health insurance/benefits. Input and feedback were offered to CRPs and ORS staff that resulted in revisions to the initial draft. Prior to the implementation, meetings with staff and vendors to explain the new structure occurred. It will be critical to assess if participation rates increase with the new schedule.
- ORS has sought for many years to bring the national Project Search model to Rhode Island. The state emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities helped to facilitate RI Project Search becoming a reality. A multi-disciplinary, state/private steering committee has been able to engage Miriam Hospital as the employer site for the project. This program will target youth with intellectual disabilities and has a start date of 2014.
- A Cooperative Agreement between ORS and the Sherlock Center, at the time a University Center of Excellence, provided a foundation for training personnel from the community mental health and developmental disability provider network. In 2013, certificates were awarded to graduates of two separate programs offered to the community via this agreement, as well as two employer forums with RI Business Leadership Network. The Assistant Administrator from ORS provides training twice a year in collaboration with

the Sherlock Center. In addition, the fee-for-service SSA Benefits Counselors from ORS present information regarding the SSA work incentives. The area of training provided by ORS titled "Recovery Thru Work" is offered to case managers, primarily from the Mental Health System, as a part of the curriculum to achieve a Community Support Professional Certification.

ORS continued to work with the Groden Network, an agency in RI recognized for its expertise with individuals on the Autism spectrum. This I&E initiative is refined with each cycle. The intervention is intended to incorporate supportive services, training, and job development, placement, and retention for individuals with Aspergers via a Job Club. Discussions are occurring with Groden and other community provider networks about replication of the program in other locations in the state.

3. Provide an Assessment of the performance of the VR program on the standards and indicators for FY 2013.

- ORS did meet RSA Standard I - VR's impact on employment or Standard II - and also meet Minority Service Rate for FFY2013.
- ORS maintained a focus on increasing quality employment outcomes as per our CNA/Strategic Plan and RSA 107 monitoring report. Employment outcomes continued to be impacted by the economic climate in R.I. While Indicator 1.5 was not met, ORS saw improvement for the second consecutive year with an average hourly wage of \$11.55 for FFY 2013 over the FFY 2012 wage of \$11.37.

Evaluation Standard 1 - Employment Outcomes

- Performance Indicator 1.1: In FFY 2013, ORS achieved 603 successful employment outcomes. This is an increase from the FFY 2012's 602 successful employment outcomes.
- Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate. FFY2013 saw an increase in the rehabilitation rate to 58.9% from the FFY2012 rate of 28.8%.
- Performance Indicator 1.3: ORS exceeded the Federal Standard earnings ratio of 72.6% in FFY2013 with a rate of 99.8%, which represents an increase from FFY2012 with a rate of 99.2%.
- Performance Indicator 1.4: ORS exceeded the Federal Standard of 62.40%, with a FFY2013 rate of 100%. This was a slight increase from the FFY2012

rate of 98.8% for individuals with significant disabilities who are earning at least prevailing wage.

- Performance Indicator 1.5: ORS continues to be challenged in meeting this indicator in part due to the RI economy. The average hourly rate of .50 earned by individuals in FFY2013 and FFY2012 was below the Federal Standard of .52. An additional challenge is the Bureau of Labor Statistics (BLS) data runs about three quarters behind making calculating of this indicator difficult.
- Performance Indicator 1.6: ORS met the federal standard of .53%. The number of individuals whose own income at time of exit was their largest source of support was 64.1% in FFY 2013 represents a decrease from FFY2012's 70.1%..

#### Evaluation Standard 2 - Equal Access to Services

- Performance Indicator 2.1: ORS met the standard of .80% for services and employment outcomes for minorities who are disabled for FFY2013 with a rate of .84%. This also represents an increase from the FFY2012 with a rate of .73.

#### 4. Provide a report on how the funds reserved for innovation and expansion (I&E) activities were utilized in FY 2013.

- Expansion of pilot projects into 3 local high schools: Partnership with local high schools, a vendor, and ORS to target youth with disabilities for intensive after-school career and work experience program to prepare for transition after high school. This initiative targeted youth with disabilities who were considered at risk of dropping out. Two of the pilots offer after-school work readiness and community work experiences programming. Students received instruction and complete a 100-hour paid work experience in their communities. In rural RI, a pilot was developed to provide seamless services, such as vocational evaluations and summer work, to school youth within their own communities. The program design included continuity of staff as students move on to adult services.
- Utilized I&E funds for State Rehabilitation Council and State Independent Living Council activities.



- In April 2013 a pilot project called "Journey to Success" was established to create a team approach to addressing the myriad of support needs of customers enrolled in ORS and the RIWorks (TANF) program. Included in this ORS/DHS team approach, ORS instituted a comprehensive case management/employment specialist model for RIWorks customers that will increase employment outcomes. The project includes an approved ORS vendor dedicating staff to provide extensive case management and hands-on job development to RIWorks customers with disabilities who have completed the 4-week Work Readiness program. Customers are immediately placed in internships in the community to assess onsite work skills. Assistance was provided for daycare, housing and transportation issues. This pilot targeted RIWorks referrals from the Providence/Pawtucket and Warwick offices. Since its inception, ongoing classes have provided wrap around services to 30 participants of which 10 are employed. The program expanded to include Spanish-speaking customers, along with the addition of a Spanish speaking job coach.

This screen was last updated on Jun 9 2014 2:23PM by Sharon Dipinto

## Attachment 6.3 Quality, Scope, and Extent of Supported Employment Services

- Describe quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities
- Describe the timing of the transition to extended services

Since the introduction of Supported Employment (SE), individuals with significant barriers to work have been able to participate in competitive integrated employment. For FFY2013, out of the 603 successful outcomes, 55 individuals with the most significant disabilities receiving Supported Employment services were placed in competitive employment. In FFY2012, out of the 602 successful outcomes, 70 individuals with the most significant disabilities receiving Supported Employment services were placed in competitive employment.

In FFY2014/2015, it is anticipated that with the State of RI mandate to implement Employment First Principles, ORS, with the support and collaboration of other state agencies and the CRP Supported Employment community, will be focusing on successful quality outcomes that reflect an increase in the number of hours employed, the hourly wage, and individuals receiving health insurance/benefits.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. In order to accomplish customer access to employment services, ORS is diligently recruiting and developing CRPs to provide Quality Supported Employment Services. The perception of physical safety and financial security in facility-based day programs and workshop settings has impeded resources from being directed toward integrated competitive employment for adults and transition-age youth with significant behavioral health, intellectual disabilities, and developmental disabilities. ORS has been a partner in several grant initiatives that sought to facilitate "work first", "discovery", and "recovery" models.

The Social Security Work Incentive and Planning (WIPA) program's grant that ended in June 2012 has been reestablished by Social Security and as a result, group sessions offering information and education about SSI/SSDI work incentives is once again being provided to the community in RI. ORS has continued to provide individualized benefits counseling to ORS eligible customers via a fee-for-service agreement with several certified benefits counselors. Due to the overwhelming number of individuals needing benefits counseling, ORS has also been instrumental in providing either financial assistance or guidance for individuals who want to obtain training to become a benefits counselor in order to meet the needs of its customers. ORS plans to involve state and private partners in developing a state-wide response to the recruitment, training and funding challenges of access to SSA certified, competent Benefits Counselors.

ORS has taken the lead on identifying and establishing qualifications for employees of mental health agencies and developmental disability agencies to insure that their level of expertise is appropriate for the vocational services being provided to ORS clients. ORS has been working with the Sherlock Center in order to identify, develop, plan, and execute training for employees of ORS approved provider networks. Attending to the training needs of CRPs is an ongoing activity. The CRP Supervisor actively meets with community providers/vendors who provide Supported Employment (SE) services to reinforce the philosophy, values, and SE desired outcomes. The CRP supervisor in collaboration with field supervisors, counselors, and ORS administrators is actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS. These meetings with CRPs provide an opportunity to address concerns, questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities. A Cooperative Agreement between ORS and the Sherlock Center, provides a foundation for training personnel from the community mental health and developmental disability provider network.

The Assistant Administrator from ORS provides training twice a year in collaboration with the Sherlock Center. The area of training provided by ORS titled "Recovery Thru Work" is offered to case managers, primarily from the Mental Health System, as a part of the curriculum to achieve a Community Support Professional (CSP) Certification.

In FYY 2013, the revised Supported Employment fee-for-service model was implemented. This new fee structure includes increased funding amounts, incremental billing, and quality employment incentive fees in order to create a more flexible service delivery model for customers needing Supported Employment services. As of April 1, 2013, this new fee structure and service delivery model was implemented. In FFY2014/2015, ORS will explore self-directed "Options Programming" providers for incorporation into Supported Employment service. There are several pilot projects being developed or implemented. For example, ORS is working with the West Bay Collaborative to expand supportive employment services for individuals with significant intellectual disabilities through Self-Directed Options funding through BHDDH. Monthly meetings with a team from ORS and a team from West Bay Collaborative convene to discuss issues and service provision of the clients in this pilot project. ORS facilitated a meeting with BHDDH and West Bay Educational Collaborative to explore issues with BHDDH Options and to examine West Bay becoming a licensed BHDDH provider. In addition, ORS is encouraging West Bay to become an Employment Network (EN) through the Social Security Ticket to Work program in order to maximize the funding for their program. ORS will be providing a training to our CRPs with assistance from SSA Maximus to the CRPs to provide and encourage their becoming EN's. Another pilot involves ORS, BHDDH, and the Trudeau Center, a vendor to both state agencies, partnering

with a local municipality to develop a Job Preparation program within the parameters of city hall.

ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting customers' individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support/vendor who will continue to provide support services to the individual with disability on a long-term basis. These long-term support providers are identified in a signed agreement of understanding, which is signed by the vendor agency and ORS. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of needed services to the individual.

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# System Information

## System information

The following information is captured by the MIS.

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Last updated by:saridipintos

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Approved by: