

Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* Sec. 102(b)(D)(iii) of WIOA

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

Amended: Input of State Rehabilitation Council on Amendment to State Plan due to more restrictive Order of Selection are as follows:

According to information you have provided, additional budget constraints, other agency constraints as well as compliance with the Consent Decree has resulted in a budget shortfall. Primary among these issues is the failure of the Office of Rehabilitation Services to receive an estimated \$5,000,000 in reallocation funds from the Federal government. The Office of Rehabilitation Services has in past years, used reallocation funds to supplement its operating budget to provide services. While Rhode Island consistently received significant reallocation funds, I question the appropriateness of relying on such a variable and unpredictable source of funding to provide services to those with disabilities in our state. I believe that the State of Rhode Island should fund the Office of Rehabilitation Services at a level to assure that all individuals with disabilities determined to be eligible to receive services be provided services in a timely and predictable manner.

Since the proposed amendment to the State Plan establishes a waitlist for category 1 individuals, it is critical that the Office of Rehabilitation Services develop strategies to provide clear and easily available information about the waitlist so that clients, potential clients, service providers and advocates can plan how best to meet the needs of those seeking services. The Office of Rehabilitation Services should make such information easily available through multiple avenues including its website and social media as well as by direct contact with the Office of Rehabilitation Services staff.

Thank you again for the opportunity to respond to the proposed changes to the State Plan.

Original Input:

1. ORDER OF SELECTION: SRC COMMENT: In the past, ORS was able to serve all eligible individuals. However, as need for services grew, coupled with the need to provide for better employment outcomes for eligible customers, ORS has had to use an Order of Selection and place individuals on a waitlist. ORS has done very well to make efforts to serve all its eligible customers, and also has done a good job in keeping the wait list relatively short and reducing wait times.

In reviewing changes to WIOA, the SRC policy committee noted an important change to the law allowing ORS to exercise its discretion to open up an Order of Selection category for individuals who were working but who might need VR services to maintain employment. The SRC recognized that VR services might be the defining moment for a person to either keep his/her employment or lose it. We encouraged ORS to exercise its discretion under WIOA and provide an exception for what we anticipated may only be a small subset of individuals. Of course, we recognized that ORS would have to determine whether it could use existing resources before committing to it and adding it to its State Plan. We are pleased that very quickly after we raised this issue with ORS, and prior to the State Plan draft, ORS informed the SRC that they were going to incorporate this into their State Plan.

2. TRANSITION: SRC COMMENT: WIOA has a renewed focus on transition aged youth. For many years, the SRC has been interested in transition aged youth as we have recognized that early supports and job exploration opportunities that allow for personal growth and maturity are hallmarks to success as adults. The SRC had a transition committee that provided input to ORS as needed. We applaud ORS for its development of projects and work opportunities for this population before the changes to WIOA renewed the commitment to this population. As a result of its efforts, ORS has (as of FFY2011) exceeded the national average of serving transition aged youth. ORS thus has a head start with transition aged youth, but the work is far from done. ORS has a longstanding cooperative arrangement with entities that serve in-school youth. Under WIOA, the focus is also on out-of-school youth. The SRC thinks more efforts may be needed to locate the out-of-school youth. ORS may need to think of additional strategies to outreach to this population. We urge ORS to do so.

3. COORDINATION WITH NONPROFITS, EDUCATION OFFICIALS AND EMPLOYERS: SRC COMMENT: The SRC made several recommendations regarding interagency cooperation and coordination with other entities. At this point ORS has not, pursuant to Attachment 4.2(c) addressed many of these recommendations. Among our recommendations included that ORS update broken links on its website. We also suggested that ORS review its expired MOU between it and RIDE as well as other MOU partners. In addition, we look forward to working with ORS on the revised Comprehensive Needs Assessment to capture WIOA expectations and employer needs. With regard to coordination with employers, we assisted ORS in framing goals. As this is a new attachment, we look forward to hearing more about ORS efforts to create new pilot projects such as Project Search expansion and additional partnerships with businesses. We continue to be interested in ORS serving as a leader in requiring Community Rehabilitation Providers (CRPs) to deliver services consistent with the spirit of WIOA. We are interested in ORS efforts to modify fee structures, expand upon the competence of CRPs, and other efforts to change the culture to one that has an expectation that all services should ultimately culminate in competitive employment outcomes for people with disabilities. Again, many of these issues were addressed in our January 19, 2016 communication to ORS.

4. SUPPORTED EMPLOYMENT: SRC COMMENT: The SRC fully believes that, regardless of disability, all individuals can benefit from competitive and integrated employment if they have the appropriate support services. However, these services are needed over a long period of time in some cases. With changes to WIOA, ORS can now provide twenty-four months of supported employment services instead of eighteen months. However, the SRC remains concerned about the longer term for these individuals. Many years ago, we strongly encouraged ORS to be a leader to set the tone for its CRPs. In response, ORS created a fee structure with the expectation that CRPs would be finding competitive integrated employment for individuals with the most significant disabilities. We believe this is still the case- that ORS can be a leader- and continue to set the tone for this expectation. More funding avenues for longer term supports may need to be identified as time progresses, but we are hopeful that the change in the law to a longer period of time will be helpful in the interim.

5. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT: SRC COMMENT: The SRC **strongly agrees with the requirement that all new VR Counselors possess a Master's degree in Rehabilitation Counseling.** We believe that this will attract the best new talent to the agency. ORS should post its new VR Counselor job openings with the area colleges. In addition, the SRC suggested that ORS explore paid internships with these colleges, and we are pleased that ORS will be exploring **this possibility.** **We remain interested in learning about the agency's strategies to recruit and retain personnel from diverse cultural backgrounds and how these strategies have been working.**

6. CONFLICTS AND CLIENT RIGHTS: SRC COMMENT: The SRC has long suggested that ORS policies retain consistent language used in federal law. Client rights information being removed from policies as has been done in recent changes to ORS policies is strongly disfavored by the SRC. At the core of ORS is a guiding body of law and its terms, vision, spirit and directives should be preserved and replicated within ORS policies and in its State Plan. Going forward, we will continue to advocate along these lines, and have been disappointed in the ORS response to our concerns.

7. AGENCY MARKETING: SRC COMMENT: The SRC comments have been replete with questions and suggestions about marketing efforts. We have asked how ORS will market to expand upon vendor competence, how it will outreach to transition aged youth, how it will market to attract new **interested business partnerships, and how it will market to attract new talent to its own agency.** ORS' need to continue to create more visibility to potential employees, new vendors, new customers, and to new businesses cannot be understated. WIOA expects outcomes and delivery in a streamlined fashion. The SRC recognizes that the changes presented are not all ironed out for ORS and remains committed to helping the agency where we can to effectuate its mission that all individuals, regardless of disability, can work in a competitive integrated setting if they have the right supports. We look forward to the future.

2. the Designated State unit's response to the Council's input and recommendations; and

Amended: ORS Response to Council's Input on Amendment to State Plan due to more restrictive Order of Selection is as follows:

The hearing was very well attended by our community partners and consumers. There was substantial discussion during the Q & A portion of the hearing. Two people provided verbal testimony (representatives from the SRC and DLC respectively). Both have also submitted written comments which are reflective of what was stated verbally at the hearing. The main point made was they would like transparency in the process, particularly as to the number of people on the waitlist so we can assure our consumers are making informed decisions when applying. We agreed and will make our total number of people on the wait list available on our website (just the raw number, not client specific information) , and will report regularly on the progress to the SRC.

Original Response

1. ORDER OF SELECTION: ORS RESPONSE: ORS concurred with the SRC about the benefits of acting on its discretion to provide services to individuals on the wait list who are presently employed and require vocational rehabilitation services in order to maintain employment in an integrated competitive setting.

2. TRANSITION: ORS RESPONSE: ORS has a well-developed Transition Program for in-school youth. **The SRC's concern about identification and engagement of young adults not affiliated with a formal educational setting is an area that could be included in the Comprehensive Needs Assessment (CNA).**

3. COORDINATION WITH NONPROFITS, EDUCATION OFFICIALS AND EMPLOYERS: ORS RESPONSE: ORS will examine its web-site to identify and correct errors or problems. ORS and

RIDE have discussed the need to renew the Cooperative Agreement (CA) and will be exercising the option to continue the agreement via a letter of agreement. Both ORS and RIDE want to have the opportunity to examine what changes, based on WIOA and experience, need to be included in a new CA. Business Engagement is a new performance measure and expectation of RSA. ORS plans to enlist Technical Assistance offered by our funding source as well as collaboration with partners. However, enlisting the SRC to help ORS include this new deliverable service as part of our C.N.A. would be very helpful. In addition, quite a few members of the SRC have considerable expertise in this area and could provide guidance. Their knowledge and competence was acutely apparent in the development of several attachments of the state plan.

4. SUPPORTED EMPLOYMENT: ORS RESPONSE: ORS agrees with the SRC's confidence in our ability to provide leadership and creativity to an important employment service for individuals with the most significant disabilities. However, I think it is important to measure that confidence with the recognition that ORS does have limitations in its scope of authority in changing the priorities and objectives of other agencies.

5. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT: ORS RESPONSE: ORS agrees with SRC suggestions.

6. CONFLICTS AND CLIENT RIGHTS: ORS RESPONSE: As stated previously, ORS appreciates **the SRC's** concern regarding removal of the Procedure section of the policy and access to information about the Client Assistance Program (CAP). The removal of procedures is in direct **response to the Governor's Office, OHHS and DHS position. In addition, a review of** several other VR agencies Policy Manuals indicated that the procedural steps of implementing a policy were not consistently incorporated into that document. ORS wants to reassure the SRC that the agency will continue to ensure client access to information about client rights and the CAP through the intake process, in conjunction with IPE development and/or Amendment, communication about denial of services as well as at case closure notification. In addition, CAP information will be posted within the agency and on the ORS web-site. ORS is striving to make agency policies helpful to our clients. The regulations do not require that agency policy mirror the language of federal regulations. All policies reference the appropriate law that serves as the foundation for the policy.

7. AGENCY MARKETING: ORS RESPONSE: ORS had a marketing committee that partnered with the SRC Marketing committee. However, the agency marketing committee faltered due to staff turnover and competing demands. The SRC Marketing Committee was disbanded. ORS agrees with the SRC that a focus on marketing is critical. Perhaps the SRC would consider resurrecting the Sub-committee on Marketing to assist ORS in enhancing our visibility to potential employers.

3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.

Explanations are listed in ORS response section.

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

N/A

2. the designated State unit will approve each proposed service before it is put into effect; and

N/A

3. All State plan requirements will apply

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

N/A

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development 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 development system with respect to:

1. Federal, State, and local agencies and 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 collaborates with include: hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, federal agencies, private businesses, and advocacy groups.

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) 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 Labor and Training (DLT), and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) expired in September 2015 but both agencies have agreed to an extension of the CA through 2018, as allowed by the original agreement. The CA extension is in the process of approval and should be fully executed by 6/30/16.

In order to enhance the 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 level Rehabilitation Counseling students.

ORS has cultivated a strong working relationship with independent living centers to augment the services provided by ORS. RI has one IL center that provides support services, transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school and in-school youth.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

ORS has been the lead agency for the state AT Grant since its inception. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide the array of deliverables offered by the AT Grant, including device loans, demonstrations, device re-use, education, and referral services. In addition, ORS operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program that is also included in the ATAP partnership. Through this

leadership role, ORS is able to enlist ATAP services for ORS clients who need access to device loans for vocational assessments and/or work experiences. In addition, ATAP in conjunction with the Business Leadership Network (BLN) and at times with the Job Accommodation Network (JAN), provides training to ORS Rehabilitation Counselors about assistive technology and the services of the program.

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

ORS does not have such cooperative agreements at this time.

4. Noneducational agencies serving out-of-school youth; and

ORS has cultivated a strong working relationship with the one RI independent living center to augment vocational rehabilitation services. The IL center has the ability to provide support services, transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. The IL center is exploring how to expand services to transition-aged populations: out-of-school and in-school youth. ORS participates with the DLT Youth Centers in their reviewing requests for proposals for Youth Center Summer Work programs. In addition, the Office of Rehabilitation Services and one of the Youth Centers, has a project of jointly working with the youth in the South County area. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS is a participant.

5. State use contracting programs.

The Vocational Rehabilitation program relies primarily on a fee-for-service model to purchase/obtain **goods and services for clients. Goods and services are authorized according to the client's Individualized Plan for Employment (IPE).**

Vendors authorized to provide services are approved by ORS via an application process and review by RI Accounts and Control, plus a federal SAM check at application and annually thereafter.

RI has four contracts due to expire 6/30/16 with educational collaboratives to provide an array of transition services to in-school and out-of-school youth. These contracts were established to assist these programs that formally had long-term contracts with ORS to provide only vocational evaluations, and to build their capacity to provide more comprehensive services such as assessment, community-based work experiences, and summer work to youth.

In addition, ORS is the lead agency for the ATAP program. The program is structured into three contracts to deliver device loans, device demonstrations, and other mandated AT grant services. The VR program also has a contract with the Sherlock Center of Rhode Island College to build **Rhode Island's capacity of Certified Benefits Counselors** for individuals receiving SSI and/or SSDI.

d. Coordination with Education Officials

Describe:

1. DSU's plans

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 VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

ORS has several formal agreements with Education Officials: (1) RI Department of Education (RIDE), and (2) RI Institutions of Higher Education.

I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)

- INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. This CA between ORS and RIDE expired 9/15 but is in the process of being extended through 2018 and will be re-written at that time. The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over 16 years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation Counselor at each high school to provide an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services in addition to the new WIOA Pre-Employment Transition Services.

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

The CA between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation **Counselors' presence within each public high school in the state.**

The referral to ORS from the LEA, with parental consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-Employment Transition Services (Pre-ETS). Under the auspices of the Cooperative Agreement, ORS is able to assist in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services and Pre-Employment Services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-Employment Transition Services Program is an expectation that all students who are found eligible for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility and updated as appropriate, and again prior to graduation.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for in-school youth is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-

Employment Transition Services provided to in-school youth may include Counseling & Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of trial work experiences prior to work. Therefore, ORS services incorporate a review with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the team and the ORS Counselor in achieving the 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

The student and his/her family's involvement with ORS will provide a seamless transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

II. COOPERATIVE AGREEMENT (CA) WITH INSTITUTIONS OF HIGHER EDUCATION

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the 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 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.

2. Information on the formal interagency agreement with the State educational agency with respect to:

A. 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;

RIDE has contracts with the Regional Educational Collaboratives to support transition, planning, and information about adult services within each high school. So each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Educational Collaboratives, provides an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS. In addition to the school-based interventions and consultation with the **LEA, ORS is involved in each region's Transition Advisory Council (TAC), the statewide Transition Council**, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible.

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals.

The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Vocational Evaluations and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training. The results of these interventions are shared with the student, families, and school personnel so that planning and academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience 120 days of trial work experiences prior to graduation. Therefore, ORS services incorporates a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

The Transition program is based on the CA between ORS and RIDE. ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees the 39 different state Local Education Authority (LEA) responsibilities for academic requirements, IDEA, and transition activities. RIDE conducts periodic monitoring visits with each LEA and includes ORS in those evaluations.

The Cooperative Agreement describes interagency collaboration and coordination, the role and responsibilities of each partner, and the process for resolving disagreements. This CA has no financial component. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services.

D. procedures for outreach to and identification of students with disabilities who need transition services.

The LEA identifies students with disabilities who may be eligible for transition services with ORS, and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and

family to explain the program, become familiar with the student, and plan next steps. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility.

At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS.

e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts & Control, and the federal SAMs web-site prior to approval by ORS. CRPs/vendors requesting approval to provide services on fee-for-service basis **will be evaluated based on ORS's need for that service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, labor market, and/or client feedback.** Based on these findings, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

- CRP staff must meet certain credentialing criteria to provide Job Coaching & Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State **agency's efforts to identify** and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide 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, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to in-school youth

and obligates ORS to set aside 50% of SE grant for youth with significant disabilities age 14-24. ORS will be exploring how to integrate these SE services into the existing transition service delivery system.

In FFY2017, 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 through real work experiences. ORS sponsors and provides 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 participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that 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 accepting responsibility to provide long term and intermittent support services to the individual with a disability. This shift in service delivery responsibility is well coordinated by the ORS counselor and CRP/long-term support provider so that there will be seamless access to the supports needed to sustain employment.

The time frame for transitioning an individual from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. Although RSA has established SE caps of 24 months for adults and 48 months for youth with disabilities, ORS will be working with CRPs who provide Supported Employment Services to improve the quality and availability of employment-related services.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (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. 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 and will be modified in FFY2017.

The state of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The CD obligates ORS to (1) provide in-school youth with I/DD a 120-day Trial Work Experience prior to leaving high school, (2) CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and (3) establishment of a Continuous Quality Improvement review of each agency providing SE services.

Considerable CRP development will be necessary to meet the needs of all ORS adult and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as Ticket to Work.

g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR services; and

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. Employer-Based Skill Evaluation (EBSE), a partnership between **ORS and specific businesses, provides up to three months' salary**-subsidized work experience in a particular career interest area of the client. This service provides a unique opportunity for ORS to **assess an individual's work skills and behaviors within a business environment. The employer** provides feedback to the agency and the client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS participates in On-the-Job Training (OJT) and Community-Based Work Experiences (CBWE) opportunities.

ORS partners with a Community Rehabilitation Provider (CRP) to identify the specific training needs of a large and growing business. The training, almost a boot camp model, that results from this collaboration occurs within the actual business facility and prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but it is also producing a qualified and specifically-trained pool of candidates for a local business.

The Workforce Development Supervisor has developed more than 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts **the employer and job develops on the qualified job seeker's behalf.**

COMPREHENSIVE NEEDS ASSESSMENT:

ORS will be conducting a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2016. This CNA will incorporate a component related to the needs of the business community and create a foundation for developing new and innovative training and services specific to those needs.

MARKETING/OUTREACH STRATEGY:

Over the next year, ORS will enlist its state partners and the SRC to develop a marketing plan that **targets specific business sectors. Collaboration with the Governor's Workforce Board**, the WIBs, RIDE, and DLT will be critical as the state moves to implement the Comprehensive System Change Plan (CSIP).

2. transition services, including pre-employment transition services, for students and youth with disabilities.

PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The state emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search becoming a reality. The first Miriam Hospital Project Search - 2014, was so successful, that the program was replicated with Blue Cross in 2015, and is planning

to further expand to an additional site in 2016. In addition, ORS funds summer work experiences for youth since 2010. All of these work experiences are in integrated community based work settings at minimum wage or above.

h. Interagency Cooperation

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

1. the State Medicaid plan under title XIX of the Social Security Act;

ORS has a working relationship with each of the entities referenced in this attachment.

THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT:

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services. However, the complexities of increased income on other benefits such as the **Developmental Disability agency's service cost share, subsidized housing, and food stamps** requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan. In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive a complete Benefit Analysis by a Benefits Counselor. ORS is working with Medicaid and Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to examine how the service can be reimbursed by Medicaid.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES:

ORS has a long standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities. ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS sponsors and participates in the Supported Employment Advisory Council for Developmental Disabilities, and has a representative on the Developmental Disabilities Council.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP. The objective of the SE services is in integrated competitive employment as an outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental 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 accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs

of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services. As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support. The State of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services in order to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA.

3. the State agency responsible for providing mental health services.

THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities. ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues. ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health 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, however, RSA has established time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

4. THE STATE AGENCY RESPONSIBLE FOR OPERATION OF ONE STOP CENTERS:

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKri One-Stop Centers. ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI. 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 also participate in annual Request for Proposal reviews. RI has two Workforce Investment Boards (WIB). Recently ORS became an active participant in the Disability Committee required by WIOA - both WIBs agreed to combine their Disability Sector Committee into one state-wide entity in order to maximize resource involvement.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe 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, including the following:

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

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

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

ORS has sought to recruit and retain qualified staff for all positions within the agency. Such incentives as assistance with CRC maintenance credits and ongoing professional training and support are intended to retain the staff. In addition, ORS has cultivated a relationship with local colleges and universities for Rehabilitation Counselor internship opportunities.

QUALIFIED PERSONNEL NEEDS: In FFY2015, ORS provided services to approximately 5,061 individuals, with an average caseload of 115. ORS has a total of 92 full-time equivalent (FTE) positions, which includes 44 MA level Vocational Rehabilitation Counselor positions. ORS has continued to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All **new counselors have Master's** Degrees in Vocational Rehabilitation Counseling. During FFY2015, 6 ORS staff retired or left the agency. Several promotions resulted in vacancies in a VR Counselor I position, a VR Supervisor position, and 2 VR Counselor II positions. One of the VRC II positions has been filled, and the other is in the process of being filled. ORS also had vacancies in the following positions: Human Services Business Officer, Information Aide, Senior Word Processing Typist, and Property Control/Supply 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.

i. Vocational Rehabilitation Counselor I - 29

Vocational Rehabilitation Counselor II - 14

Vocational Rehabilitation Counselor for the Deaf - 1

Supervisory - 13

Administrative - 7

Fiscal - 6

Case Aide - 3

Support Staff - 9

Social Services - 6

Direct Services - 4

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Vocational Rehabilitation Counselor I - 2

Vocational Rehabilitation Counselor II - 1

Vocational Rehabilitation Counselor for the Deaf - 1

Supervisory - 1

Administrative - 1

Fiscal - 0

Case Aide - 0

Support Staff - 3

Social Services - 0

Direct Services - 0

Support Staff - 3

Social Services - 0

Direct Services - 0

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services 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.

Vocational Rehabilitation Counselor I - 3

Vocational Rehabilitation Counselor II - 3

Vocational Rehabilitation Counselor for the Deaf - 0

Supervisory - 2

Administrative - 1

Fiscal - 1

Case Aide - 1

Support Staff - 1

Social Services - 1

Direct Services - 1

B. Personnel Development

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

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

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.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

As of 5/2016, there are 151 students enrolled in the graduate programs (84 at Assumption College and 67 at Salve Regina University) so as to obtain their MA in Rehabilitation Counseling.

iii. 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.

Assumption College - 32 Graduates from previous year with a MA in Rehabilitation Counseling

Salve Regina University - 14 Graduates from previous year with a MA in Rehabilitation Counseling

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development 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.

- 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. Both offer a MA in Rehabilitation Counseling via a combination of on-campus and distance learning.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

1. ADEQUATELY PREPARED AND TRAINED STAFF

- Rhode Island does not have a state-approved or recognized licensure or registration requirement 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.** Rehabilitation Counselors are also highly encouraged to obtain the State of RI Qualified Rehabilitation Counselor Certification, a document awarded by DLT Workers Compensation Unit. ORS will continue to monitor any state efforts for licensure of Rehabilitation Counselors.
- During FFY2013 ORS piloted a program to encourage and fund counselors to pursue their CRC, which has resulted in nine VR Counselors receiving their CRC. At present ORS has 25 VR Counselors, Supervisors, and Administrators who are CRC certified, and has one VR Counselor currently pursuing their CRC. ORS will explore the feasibility of continuing to sponsor VRC staff acquisition of the CRC.

- ORS has assigned an Administrator and Supervisor to the Department of Human Services RAMPS team which has a focus on succession planning and recruitment. (RAMPS is a long-term project that **attempts to install both “off ramp” (exit processes, knowledge retention & succession development) and “on ramp” (on-boarding and orientation) programs and policies for the Department.**)
- 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 meet the CSPD standard of filling all VR Counselor vacancies with individuals **with a Master’s Degree in Rehabilitation Counseling and** expects to be able to continue to meet this standard.
- Through the practicum/internships, involvement on Advisory Boards, and speaking with students in MA Rehabilitation Counseling programs, ORS has worked aggressively with the institutions of higher education to recruit qualified individuals to fill vacancies.
- ORS will continue to fill all fiscal and support staff vacancies with individuals who meet state requirements for education and experience.

2. ANNUAL PERSONNEL NEEDS ASSESSMENTS

The Training Coordinator of ORS conducted a Training Needs Assessment. Information elicited from staff is used to establish a list of training topics and concerns.

- **Top areas of training needs self-reported** by VR Counselors included: 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.**
- **Training** will also incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA.
- **A training schedule is 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 (CRPS).
- **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.**

B. the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Training opportunities are provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices, and assistive technology. 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.

4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development

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, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

- ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of areas identified for training included: Motivational Interviewing, Substance Abuse, Ethics in Rehabilitation Counseling, disability specific training, Cultural Diversity, Supported Employment, Ticket to Work, Relationship Building with the Business Community, Social Security Reimbursements, Employment Networks Partnership Plus, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors.
- The development of a group for Vocational Rehabilitation Counselors providing supervision to interns from Salve Regina University and Assumption College is planned to support agency training of interns.
- 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.
- Of forty-four Rehab Counselors, eight have been on the job for less than 5 years; thus necessitating the training on vocational rehabilitation assessment, guidance and counseling, best practices, and ORS policies and procedures.
- ORS believes that the next three-four 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 due to anticipated promotions and retirements.
- Majority of staff attend the Annual AT Conference in order to learn about new AT devices and services that are available. The 2015 conference had forty-seven vendors available to provide information, as well as thirty-one presentations held over 2 days.
- VR Supervisor participated in the Assistive Technology Industry Association (ATIA) National Conference, where she and an ATAP partner presented "On-the-Job with Mobile Technology - a Go-Pro Perspective". Arrangements are being made to offer this presentation to SE staff at a monthly SE/DoJ meeting.
- Identify available staff resources with the competencies to function as Business Ambassadors, agency marketers, advocates, and educators to the business community.
- ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.
- The Training Coordinator elicits input from counselors, supervisors, support staff, and administrators regarding their 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.
- Explore feasibility of working with Human Resources on how to develop a more formalized mechanism to document supervisory feedback and professional growth goals of staff.
- Enhancing staff competencies in addressing the needs of business community will be a priority for training and examining staff responsibilities.

B. Acquisition and dissemination of significant knowledge

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

- ORS will utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC)/Workforce Innovation Technical Assistance Center (WINTAC) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocation Rehabilitation services.
- Enlist Workforce Innovation Technical Assistance Center (WINTAC) to assist ORS in addressing the following WIOA requirements: (1) Establish performance measure data collection; (2) Establish relationship with DLT; and (3) Establish relationship with Business Community.
- Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

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

- Interpreters and translators are available to 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 a UBI Duo in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.
- The Sr. 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 Deaf and Hard of Hearing Region at ORS has developed and produced an ASL video that explains ORS services and is available on the ORS website.
- 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.
- ORS brochures are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, 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 Act.

- ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration, and service delivery planning between the VR Counselors assigned to the LEA, teachers, and special education staff.
- ORS has about 30 Vocational Rehabilitation Counselors who have Transition responsibilities for providing services to in-school youth with disabilities, technical assistance to school personnel, and outreach to families.
- On a monthly basis, the Assistant Administrator for Transition facilitates a meeting with all the counselors with Transition responsibilities to reinforce Pre-employment Transition Services (Pre-

ETS), training, and problem solving. At least annually, RIDE is invited to provide information about current and changing trends, regulations, and practices.

STATE REHABILITATION COUNCIL

Pursuant to the Act, ORS offers to the State Rehabilitation Council (SRC) the opportunity to review and comment on the CSPD. Additionally, members of the State Plan, Quality Assurance Policy Committee met with ORS representatives to provide input into the CSPD.

j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

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

A. with the most significant disabilities, including their need for supported employment services;

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.

ORS and the State Rehabilitation Council will be initiating a CNA in FFY2016/17 for the 2018 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

- With the most significant disabilities, including their need for supported employment services;
- Who are minorities;
- Who have been unserved or underserved by the VR program;
- Who have been served through other components of the statewide workforce development system; and
- Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

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
- 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 ORS **Vocational Rehabilitation 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)

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

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. The 2015 satisfaction survey results reflect an increase from the 2014 responses, and continue to reflect improvement over the 2014 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, continued learning and skill enhancement for advancement, 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. 2015 surveys reflected positive informed choice trends in the areas of identification of interest, abilities and strengths as related to an employment goal and assistive technology assessments/needs. Areas for continued monitoring are guidance and counseling leading to enhanced understanding of the VR process and informed choice in the area of services. While respondents indicated a positive trend in receipt of benefits planning information, it was noted that the number of respondents who discontinued engagement with VR due to a concern of losing of Social Security, medical coverage, etc. increased.

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 Caucasian, 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 ORS' 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 2015, staff from ORS participated in the seven 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

B. who are minorities;

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**

C. who have been unserved or underserved by the VR program;

The Comprehensive Needs Assessment (CNA) completed in 2014 identified the following as the most unserved/underserved populations served by the VR program:

Substance abuse related disorders

Intellectual Development Disability

Behavioral Health

American Indian/Alaska Native

Pacific Islander/Native Hawaiian

Asian

D. who have been served through other components of the statewide workforce development system; and

The Comprehensive Needs Assessment (CNA) conducted in 2014 did not identify unserved populations for that component. However, discussions between Office of Rehabilitation Services (ORS) and One-Stop Career Centers has identified that many of the people utilizing One-Stop Career Centers were very reluctant to identify that they have a disability, which then impedes their access to ORS services.

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

The 2014 Comprehensive Needs Assessment (CNA) identified that in-school youth with 504 plans are underserved.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

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

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

ORS currently has approximately 650 in-school youth with disabilities. The Transition and Pre-ETS program of ORS has been documented in descriptions (d) Coordination with Education Offices; (g) Coordination with Employers; and (i) CSPD. The CNA for 2017 will be examining unmet needs related to out-of-school youth up to age 24. The DOJ/State Consent Decree requirement to focus on in-school youth with I/DD may have a resulting effect on non-I/DD youth with disabilities being served by the transition program at ORS. Therefore, the new CNA may need to examine that area.

k. Annual Estimates

(Formerly known as Attachment 4.11(b)). Describe:

1. The number of individuals in the State who are eligible for services;

For FFY2015, there were 2,460 new applicants, and 1843 individuals were deemed eligible. There were a total of 1,556 individuals who developed their Individualized Plan for Employment (IPE), and 644 individuals who obtained successful employment outcomes.

For FFY2016, ORS has a goal of 2,461 new applicants, and expects 1,844 individuals to become eligible. ORS anticipates that 1,557 new Individualized Plans for Employment will be developed, and 646 successful outcomes achieved.

For FFY2017, ORS projects 2,462 new applicants, with 1,845 individuals to become eligible for ORS services. ORS anticipates that 1,558 individuals will develop Individualized Plans for Employment, and projects 651 successful outcomes.

2. The number of eligible individuals who will receive services under:

A. The VR Program;

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

As of 10/30/17, ORS has 3,991 active clients. This number includes 520 Non-Applicant Pre-ETS students; 3,421 Category I clients in different statuses; 48 Category II clients, of which 28 are on the Wait List; and 2 Category III clients on the Wait List.

NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

It is anticipated that beginning 12/1/17 all OOS Categories I, II, and III will be closed, and that as money and staff resources become available, individuals will be taken from the Category 1 wait list by date of application. During the month of November 2017, ORS may admit 200 more clients in Category I to active status. ORS in FFY 2017 admitted 27 eligible clients who needed services to sustain employment. It is not anticipated that clients in Category I on the wait list will be moved into services during FFY 2018.

OOS Category I - 2,897

OOS Category II - 20

OOS Category III - 0

Maintain Employment - 27

Total - 2,939

B. The Supported Employment Program; and

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

Amended: In FFY 2018, the projected number of Title VI to be served under an IPE is 725.

ORS will implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services, who are currently employed and at risk of job loss due to their disability, and who could benefit from VR services to maintain employment.

C. each priority category, if under an order of selection;

Amended:

• OOS Category I - Title VI: 724 • OOS Category II - Title VI: 0 • OOS Category III - Title I: 0 • Maintain Employment Clients: 5

ORS will continue to implement the option of serving eligible individuals with a disability who are assigned to a closed OOS priority category, who are currently employed and at risk of job loss due to their disability, and who could benefit from VR services to maintain employment. In FFY 17, ORS provided services to 12 individuals waived from the OOS Wait List due to employment status need.

FFY 2017, ORS provided post-employment services to 16 clients. Therefore, in projecting the number of post-employment clients that will open with ORS for FFY 2018, it is anticipated that at least 15 clients will be provided Post Employment Services. The individuals will be provided services only if needed to sustain or save job.

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Amended: The OOS Wait List is 30 as of 10/30/17. Of this number, 28 are OOS Category II, and 2 are OOS Category III. Each month, ORS averages 200 Category I admissions and 20 Category II admissions, so 220 clients will be admitted to Wait List for each month of FFY 2018. It is anticipated that by 10/30/18, 2,640 clients will be on the Wait List. It is not anticipated that clients in Category I on the wait list will be moved into services during FFY 2018.

4. 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.

Amended:

OOS Category I - Title I: $\$5,600,509.00 \div \$1,933.21 \times 2897 = 5,600,509$
OOS Category I - Title VI: $\$1,399,492.00 \div \$1933.00 \times 724 = \$1,399,492$
OOS Category II - Title I: $\$83,333 \div \$4,166.67 \times 20 = \$83,333.40$
Maintain Employment clients: $\$10,000.00 \div \$1,111.11 \times 27 = \$30,000$

I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed

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, and jointly agreed to any revisions.

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 Performance Measures as stated in WIOA, 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.

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

GOALS FOR FFY2017

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two-three sector business to address personnel recruitment and training needs

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist, via RFP, trainers to build and implement a training curriculum
- Pilot, modify, and replicate

OBJECTIVE 2: Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Encourage RFP requirements of WIOA partners to devote 7% of grant to partnership with ORS and target individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- Expand Project Search from two to three sites
- Enlist Community Enterprise Training, a current ORS vendor, to develop an additional Business/ORS training-employer partnership.
- Partner with an emerging, high wage business sector

GOAL 2: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into integrated competitive employment.

- In-School Youth with Disabilities: enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that integrated competitive employment is the goal from services.

- Develop and implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree.
- Implement training opportunities for SE vendors in assessment, job development, and coaching.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.

- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training program that result in integrated competitive employment outcomes.

- Replicate the Continuous Quality Improvement process for training and rehabilitation services vendors.
- Research and evaluate specific services and correlation with employment outcomes.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.

OBJECTIVE 1: Meet WIOA performance accountability measures

- Participate on the RI Department of Administration (DOA) Common Performance Measures Committee
- **Determine the “what and how” of contributing ORS data to state reporting requirements**
- Educate staff to the new data elements that are required and need to be maintained, be timely, and accurate
- Obtain guidance from RSA to establish specific numerical targets
- Determine how to collect baseline data on performance measures
- Participate in Technical Assistance opportunities on capturing performance measures

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development

- Determine eligibility within 60 days of application
- Develop the Individualized Plan for Employment within 90 days of eligibility determination
- Utilize MIS to track adherence to these standards on a monthly basis

3. Ensure that the goals and priorities are based on an analysis of the following areas:

Goals and priorities established were based on results of 2014 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from clients through client surveys.

A. The most recent comprehensive statewide assessment, including any updates;

Goals and priorities established were based on results of 2014 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from clients through client surveys. ORS will be conducting in collaboration with the SRC, a 2017 CNA.

B. the State's performance under the performance accountability measures of section 116 of WIOA; and

ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the common WIOA performance measures and RSA standards of practice as evidenced by agency ability to meet reporting and status change expectations of RSA. In order to meet this goal, ORS plans to participate on the RI DOA common performance measures committee,

to determine the “what and how” of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107.

The Office of Rehabilitation Services was under a Performance Improvement Plan (PIP) and Corrective Action Plan (CAP) as a result of the 2012 RSA Monitoring visit. ORS met all of the requirements and resolved all of those issues. In addition, State of RI government agencies are looking at incorporating LEAN principles into practices and procedures.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services.

Amended:

Order of Selection Description

The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability -

(i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;

(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and

(iii) who has one or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations.

- First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits three or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.
- Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits one or two functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

- Third priority will be given to other eligible consumers who have a disability that seriously limits one or more functional capacities, but who do not require multiple services over an extended period of time.

Extended period of time: Six months or more.

Multiple services: Requiring two or more primary services.

A. ORS will assign eligible clients to the Wait List who meet the criteria for Category I beginning 12/1/17, and will continue to assign to the wait list eligible clients who meet criteria for Category II or Category III. ORS will serve, as allowable under the WIOA amendments, eligible clients regardless of classification on the Order of Selection who need VR services who are in imminent danger of losing their job to maintain their current job.

For FFY2016 through FFY2017, ORS will serve individuals with the most significant disabilities Priority Category 1 first and individuals with a significant disability Priority Category 2 second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category 3.

ORS will implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment.

B. The justification for the order.

Amended: In FFY 2010 due to retirements, budget constraints, promotions, sick leaves, and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities. All Category II and Category III individuals were placed on a Wait List for services. When resources have become available, Category II eligible clients have been moved off the wait list. It was anticipated, at the time, that this restriction would continue through FFY 2017.

At the conclusion of FFY 2017, ORS is confronted with additional budget constraints, increased costs of services, and agency obligations to comply with a Department of Justice Consent Decree. ORS requested \$5,000,000 in re-allotment VR funds and received \$532,198, as a portion of the funds was used to assist hurricane states. The culmination of **these factors is impeding the Agency's** ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection.

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.

C. The service and outcome goals.

Amended: Projections for numbers to be served in FFY2018 are based on the current census. These numbers reflect those currently being served or projected to be served prior to the closure of Category I. All categories will be closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible but have not begun to receive services under an IPE.

Order of Selection (OOS):

OOS Category I : 3,621

OOS Category II: 20

Maintain Employment Clients: 27

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.

D. The time within which these goals may be achieved for individuals in each priority category within the order.

Amended: 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. Projections based on recent performance: Priority Category I - 36 Months Priority Category II - 13 Months Maintain Employment Clients- 2 Months

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

Amended: ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the most significant disabilities, Priority Category I. 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. Beginning 12/1/17, ORS is closing all categories and taking individuals off the Category I wait list as funds are available for services by date of application. ORS does not anticipate opening the waitlist for any category during FFY2018.

ORS notifies all individuals who do not meet the current Order of Selection, and provides information and referral services. These alternative resources are intended to assist in obtaining employment and related services through such Workforce Development resources as the American Job Centers. Individuals are re-assessed when additional information about their functional limitations is received following the OOS classification decision.

Two exemptions to placement on the Wait List follow:

1. Requests for services to maintain employment are subject to the Order of Selection, and the request for these services will only be granted if the individual is in imminent danger of losing their job and need ORS intervention to save that job.

2. Pre-Employment Transition Services (Pre-ETS) are ORS services that are provided to students with disabilities in collaboration with each Local Education Authority (LEA) or other school program. Students receiving Pre-ETS prior to application and/or eligibility determination may continue to receive Pre-ETS services. Conversely, students determined eligible prior to beginning of receiving Pre-ETS will not receive them until they are taken off the wait list according to the priority category assigned. These Pre-Employment Transition Services, which fall under the regulations implementing the 2014 Workforce Investment Opportunities Act (WIOA) amendments to the Rehabilitation Act of 1973 to help to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities who choose to work, to gain the necessary skills, preparation, exploration, and supports to enter the workforce.

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

Amended: In response to the WIOA waiver to the Order of Selection Wait List, ORS will be exercising its option to provide services to individuals, regardless of priority category, who are employed and need VR services to sustain employment. Individuals meeting this criteria are subject to the OOS and Wait List.

n. Goals and Plans for Distribution of title VI Funds.

1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

STATE'S GOALS AND PLANS FOR TITLE VI FUNDS

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 RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, 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.

GOALS FOR FFY 2017 TITLE VI

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE SUPPORTED EMPLOYMENT OUTCOMES FOR ORS CUSTOMERS WITH THE MOST SIGNIFICANT DISABILITIES COMPARED TO SUCCESSFUL SUPPORTED EMPLOYMENT OUTCOMES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two to three sector business to address personnel recruitment and training needs.

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist, via RFP, trainers to build and implement a training curriculum
- Pilot, modify, and replicate

OBJECTIVE 2: Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Establish a system to disseminate information to VR Counselors
- Encourage RFP requirements of WIOA partners to devote 7% of grant to partnership with ORS and target individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- Expand Project Search, targeting in-school youth with the most significant disabilities, from two to three sites
- Enlist Community Enterprise Training, a current ORS vendor, to develop an additional Business/ORS training-employer partnership

GOAL 2: TO PROVIDE A FLEXIBLE SUPPORTED EMPLOYMENT SERVICE DELIVERY SYSTEM, BASED ON EMPLOYMENT FIRST PRINCIPLES AND PRACTICES THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY INCREASED COMPETITIVE EMPLOYMENT OUTCOMES.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of adults and youth with the most significant disabilities to improve integrated competitive employment outcomes.

- In-School Youth with Disabilities: Enhance the Transition program and service options within each high school to coordinate and deliver Pre-Employment Transition Services (Pre-ETS) that provide assessment and work experiences to youth in order to reach a competitive, integrated employment outcome.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible, considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

OBJECTIVE 2: Change the culture of the Supported Employment (SE) vendor community to expect integrated competitive employment as the goal of services.

- Develop and implement a Continuous Quality Improvement (CQI) process for vendors working with customers with Developmental Disabilities, as required by the DOJ/State Consent Decree.
- Expand the CQI process to all vendors authorized to provide the array of SE services.
- Implement training opportunities for SE vendors in assessment, job development/coaching, and business relationships.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
- Examine the VR fee structure to ensure it rewards integrated employment outcomes.

Objective 3: Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.

- Research and evaluate specific services and correlation with employment outcomes.
- Offer RFPs that are designed to provide innovative SE services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS

Objective 1: Meet WIOA performance accountability measures.

- Participate on the RI Department of Administration (DOA) Common Performance Measures Committee.
- **Determine the “what and how” of contributing ORS data to state reporting requirements.**
- Educate staff to the new data elements that are required and need to be maintained, timely, and accurate.
- Obtain guidance from RSA to establish specific numerical targets.
- Determine how to collect baseline data on performance measures.
- Participate in Technical Assistance opportunities on capturing performance measures.

Objective 2: Meet RSA requirements for eligibility and plan development.

- Determine eligibility within 60 days of application.
- Develop the Individualized Plan for Employment within 90 days of eligibility determination.
- Incorporate the time line, specific supports, and long-term support providers in SE IPEs.
- Enlist RIDE, BHDDH, Medicaid, & ORS to braid funding to support the provision of SE services as part of Pre-ETS..
- Establish increased knowledge **about each state agency's responsibility for funding, adults and youth, SE services** in collaboration with each state partner, and the SE vendor community.
- Utilize MIS to track adherence to these standards on a monthly basis.

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

A. the provision of extended services for a period not to exceed 4 years; and

WIOA obligates ORS to set aside 50% of the Title VI grant for youth with the most significant disabilities age 14-24. ORS anticipates that each population of youth will need different SE services and approaches to engage, explore, and prepare for employment:/p>

Youth In-School in need of SE Services:

- Enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide services and work experiences to youth in order to reach an integrated competitive employment outcome.
- Expand Project Search, targeting in-school youth with the most significant disabilities, from two to three sites.
- Increase the number of Summer Work experiences.
- Refine the Vocational Evaluation service to utilize discovery principles and career exploration opportunities.
- Develop the capacity and process for providing Job Coach supports for community-based work experiences.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.

Youth Out-of-School in need of SE Services:

- Engage DLT Youth Centers, One-Stop Centers, Adult Education Programs, Mental Health agencies, and DD Agencies to identify out-of-school youth in need of SE services.
- Build SE agency capacity to provide a continuum of services.
- Facilitate referrals to BHDDH of youth in need of SE services so that long term supports can be available to sustain employment.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Enlist RIDE, BHDDH, Medicaid, and ORS to braid funding to support the provision of SE services as part of Transition and Pre-ETS.

Establish increased knowledge about each state agency's responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community. Maximize existing youth resources, such as DLT Youth Centers.

o. State's Strategies

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

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

The goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title VI Funds will be realized through the following strategies:

METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES:

ORS plans to expand and improve services through: (1) improved relationships with the business community, (2) staff training focused on client preparation for an employment outcome, (3) increased marketing and accessibility of information about the agency; (4) analysis of internal processes and methods to improve operational systems and overall services to clients; and (5) Continuous Quality Improvement Activities.

1. The overall purpose of ORS, as reinforced by WIOA and the RI Governor's Workforce Board (GWB) system-change initiatives, is to increase the competitive employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next year will include collaboration with other state agencies to develop a coordinated approach to implementing a business needs and customer driven service delivery system, as described in the GWB's Comprehensive System Improvement Plan (CSIP). This revised service-delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer. ORS will enlist its partners to identify two-three businesses to develop targeted training programs to meet the specific needs of business sectors. ORS will continue to participate on the Governors Workforce Board, Workforce Investment Boards, Common Performance Measures Task Group, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS will advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources. ORS will encourage WIOA partners to include an RFP requirement that 7% of grants must be devoted to partnership with ORS and target individuals with disabilities. Several successful business partnerships, Project Search, and Community Enterprise Training will continue to be supported by ORS. The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three year increments, will incorporate the findings of the CSIP and determine if any additional assessment areas are appropriate.

2. ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success. Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, **incorporating work experiences into employment plan development will increase the client's ability to**

make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors. Participation in employment experiences for individuals needing Supported Employment, in-school youth and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE). ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage. ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery principles and practices 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. ORS will 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 decisions.

3. ORS will be updating its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development. Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will explore the feasibility of being able to communicate and advertise using this vehicle of communication. In addition, orientation groups, literature distribution about the agency, presence at the netWORKri One-Stop Centers, and participation in resource education events around the state will enhance referrals and visibility.

4. Expansion and improvement of services involves also examining processes that guide the internal operation of the agency. ORS is critically examining its services through participation in a state-wide LEAN initiative spearheaded by the Governor of Rhode Island. This effort provides an opportunity to explore the specific processes and methods that structure the operation of the agency. An initial study of agency operations will focus on the intake process in order to develop the most efficient/effective customer friendly process possible. A second area of study will be the billing process that has a direct impact on timeliness of payment to vendors.

5. The ORS Continuous Quality Improvement (CQI) committee will update the CQI plan annually to ensure a continuous QI system for monitoring, evaluating, and providing timely information for staff **and administration about the agency's progress in meeting the** goals outlined in the State plan. Monitoring via monthly reports to ORS Administration and staff about status of performance **measures will occur. Additionally, quarterly reporting to the Governor's office on the status of the** deliverables (eligibility, IPE development, and I/DD Supported Employment services) that are included in the RI Strategic Plan Vocational Rehabilitation objectives. ORS will continue to elicit feedback from customers through satisfaction surveys, waitlist outreach, and follow-up as well as ongoing case reviews. The DOJ/State Consent Decree requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot, and modify the process for CQI review of CRPs.

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

PROVISION OF A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

ORS is able to meet the assistive technology and accommodation needs of its clients through the Assistive Technology grant and through vendors approved to provide services through the fee-for-service authorization process.

ORS is the lead agency for the Assistive Technology Grant in RI. The RI Assistive Technology Access Partnership (ATAP) is the name of the program operated by ORS that facilitates the deliverables of the grant. Through contracts with several community-based non-profits, ORS ensures that assistive technology demonstrations, device loans, and re-use opportunities are available. On an annual basis, ORS enlists the ATAP partners to conduct a training for the Vocational Rehabilitation Counselors of ORS.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults and youth with disabilities. The Deaf & Hard of Hearing and Services for the Blind and Visually Impaired (SBVI) units are especially knowledgeable about assistive technology and include these resources in all aspects of the vocational rehabilitation process. In addition, ORS has several vendors who can assess worksite accommodations and assistive technology needs on a case by case basis.

The agency Workforce Development Supervisor is also a resource to employers around accommodations.

ORS plans to enhance the use of the ATAP device demonstration and loan capacity as a resource for making informed choices about equipment, and for using try-outs prior to purchase in order to make more appropriate purchasing decisions. In addition, the DOJ/State Consent Decree has resulted in an increased use of ATAP partner services for ORS supported employment clients ability to loan equipment and devices.

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

OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

ORS monitors outcome ratios for minority populations in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging minority populations.

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.

ORS ensures 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.

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; etc.

Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome.

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

the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school-to-work transition for over 16 years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plan. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD).

Each high school has an identified ORS Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals. ORS contributes to this process through Rehabilitation Counselor attendance and/or consultation to the transition team meetings. A referral system is in place for students with disabilities, and each fall ORS, in collaboration with the Regional Educational Collaboratives, provides an orientation to Special Education staff at each Rhode Island High School. Transition and Pre-ETS services include: Counseling & Guidance, Vocational Evaluations and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any work activities already completed by the LEA such as volunteer positions, work tryouts, and internships provide valuable information to the discussion and planning process. These activities are considered trial-work experiences, so are important to vocational planning.

Transition and Pre-ETS incorporates services for the DOJ/State Consent Decree identified youth with significant intellectual disabilities, as well as for all in-school youth eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all in-school youth with I/DD beginning at age fourteen and reviewed annually. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities for in-school youth may include such services as: Vocational Evaluations and Assessments; Community Based Work Experiences; Participation in Transition Academies; Summer Work Experiences for In-School youth (Employment Alliance - an extended school year paid work experience supported by ORS & an LEA as well as the four-week paid work experience funded by ORS to an ORS approved provider); Project Search, and a pilot of a summer internship program specifically designed for young adults in 2 year and 4 year degree programs

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

PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

The new CRP Supervisor, formerly a Field Supervisor with the agency, has been in place for the past year. Through his efforts, ORS is establishing quarterly meetings with the Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his

participation on the ORS Continuous Quality Improvement Team, the agency has been developing a Quality Assurance program initially for Supported Employment providers. This Quality Assurance Program is required by the DOJ/State Consent Decree, but will eventually be generalized to all CRP providers.

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 are developed and implemented by the SRC State Plan and Continuous Quality Improvement Committee. These studies, organized by the ORS Strategic **Planning Supervisor, provides ongoing information that is relevant to customers' vocational rehabilitation needs and planning.**

In 2013, ORS designed a fee-for-service structure that provided financial incentives for employment outcomes that meet certain benchmark criteria: (1) hours worked and access to and participation in benefits. ORS reviewed the Quality Incentive Bonus being offered to Community Rehabilitation Program providers for the past two years. This resulted in a suspension and plan to redesign the incentive with a focus on assisting customer with obtaining employment that is in keeping with their vocational goal and offers higher hourly wages and the provision of retention services for a longer period of time to assist customers with position advancement and income.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to develop a fee-for-service structure 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), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. However, training programs must demonstrate that employment in the field is identified by business sectors. Fee-for-service agreements incorporate a similar process with the Community Rehabilitation Provider (CRP) being funded based upon authorization, service provision, and employment outcomes. ORS will utilize the information from the FFY2013 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. In FFY 2016/2017, a new Comprehensive Needs Assessment will be completed that captures WIOA expectations of employer needs.

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

STRATEGIES TO IMPROVE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

ORS is participating on a RI DOA Performance Measure Committee that is part of the Governor's system change efforts. The committee is examining methods to gather and track employment outcomes, educational and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases. In addition, monthly monitoring of time line requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applicants, plan development, and successful employment outcomes. This year will provide an opportunity to gather baseline performance information that will provide the basis for improvement strategies moving forward.

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

STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Workforce Development Supervisor interacts with the business community, federal employment resources, National Employment Team **(NET), Chamber of Commerce, Women's Business Enterprise (WBE), and Minority Business Enterprise (MBE)** trade organizations. Both the Workforce Development Supervisor and the Administrator of VR participate on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Sub-committee. ORS staff **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.**

ORS, through its parent agency, Rhode Island Department of Human Services, and as required by WIOA, 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.

ORS provides leadership and consultation to the vendor community. Vendors have historically **viewed themselves as "social service"**-oriented rather than as part of the workforce development community. Providing case specific consultation as well as education about business practices, employment outcomes, and accountability has become a focus of the dialogue between ORS and its approved vendors.

At this point, it is not clear how ORS, Adult Education and Department of Labor and Training will be collaborating on adult education and apprenticeship programs. ORS could use some technical assistance from RSA on this topic.

8. How the agency's strategies will be used to:

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

TTHE AGENCY'S STRATEGIES WILL BE USED TO:

ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The goal and objectives outlined by ORS to increase competitive employment opportunities for ORS customers and to provide a flexible service-delivery system that prepares customers for employment align with the 2013/2014 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2013/2014 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities. ORS will continue to assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan. ORS will coordinate joint training opportunities for CRPs and ORS personnel, **maximize ORS' collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and**

business community, and promote CRP capability in the provision of a continuum of employment services. ORS will encourage assessment activities and plan development that promotes informed choice, self-determination, and case movement toward integrated competitive employment, enhance Supported Employment services with emphasis in integrated and competitive goals, maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits), emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses and coordinate staff resources to work in collaboration with the SRC sub-committees as warranted example, QI/State Plan. ORS and SRC will be initiating a new CNA during FFY2017 for incorporation into the FFY2018 State plan.

B. support innovation and expansion activities; and

- ORS will utilize Innovation and Expansion (I & E) funds during FFY2017 to support the activities of the SRC. The SRC and ORS will conduct a state-wide Comprehensive Needs Assessment, as required by RSA. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing **reports from the Governor's Workforce Board, the results of the Governor's Commission on Disabilities**, as well as DLT reports to frame and structure the CNA.
- ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Such efforts as Project Search, business based training, and expansion of OJT will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes funding will be encouraged.
- I&E funds will be used to generate a service-delivery response that increases the number of minority and underserved populations who participate in services, stay engaged, and who obtain quality employment outcomes.
- ORS will use I&E funds to 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 **Asperger's and Autism, and individuals with sensory impairments**
- ORS will use I&E funds to explore development of a performance-based contract specific to the services provided by the SE Vendor community to individuals with significant intellectual disabilities. The purpose of this pilot is to increase the employment outcomes, as per the DOJ/State Consent Decree, for this population of ORS clients.

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

- ORS will increase the number of minority and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.
- ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers.
- ORS will enlist the resources of interpreters, and ensure forms and information is accessible. Orientation groups are provided for potential applications to attend and apply for services, this includes an orientation group monthly with Hispanic bilingual staff.
- ORS maintains the ability to access information and the application for services on our website.
- Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

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

A. Identify the strategies that contributed to the achievement of the goals.

AN EVALUATION OF THE EXTENT TO WHICH THE VR TITLE I PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED.

STATE PLAN FOR VR TITLE I FFY 2014 AND FFY 2015: The State Plan for FFY2014 and FFY2015 incorporated tracking of admissions, service, and employment outcomes 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.

Accomplishments:

- Several new initiatives, fee-structure adjustments, and expanded training programs had been developed in response to the data analysis, CNA, and feedback from customers, vendors, and staff. ORS developed a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. This process enabled ORS to successfully resolve a Corrective Action Plan instituted as a result of an RSA Monitoring visit in 2012. Several of the other initiatives included: development of two Project Search sites in collaboration with two local businesses, a partnership with a local business to provide on-site training and resultant employment for ORS customers, and development of a summer work experience specific to the career goals of customers attending college.
- In addition, an incentive program to CRPs intended to increase employment hours and benefit availability for customers placed in jobs was piloted for two years. Analysis of this program determined that the intended outcome of quality integrated competitive employment that maximized an individual's earning potential, work hours, and receipt of benefits was not effective so ORS suspended the program in 2015.

STATE PLAN FOR VR Title I FFY 2016: A re-write of the state plan was not required.

ACTUAL EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

FFY2014 - Successful Closures 608
FFY2015 - Successful Closures 643
Variance - Successful Closures 35
Successful Transition Closures -11
Successful Minority/Underserved 54

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

STATE PLAN FOR VR TITLE I FFY 2014 AND FFY 2015: Obstacles

Obstacles for FFY2014 and FFY2015 for Title I, VR, include the focus on in-school and adult **mandates which has compromised the agency's focus on other transition and adult populations.** ORS is exploring obtaining additional information on this trend as part of the CNA.

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

A. Identify the strategies that contributed to the achievement of the goals.

AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT TITLE VI PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT YEAR WERE ACHIEVED:

STATE PLAN FOR SE Title VI FFY 2014 and FFY 2015: The State Plan for FFY2014 and FFY2015 incorporated tracking of admissions, service, and employment outcomes 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.

- Accomplishments: The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued support of sheltered workshops impeded resources being re-directed to employment and long term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding and collaboration among state agencies.

STATE PLAN FOR Title VI FFY 2016: A re-write of the state plan was not required.

ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

FFY2014

Successful Supported Employment Closures 60

FFY2015

Successful Supported Employment Closures 95

Successful Minority and Underserved Closures 36

Variance

Successful Supported Employment Closures 35

Successful Minority and Underserved Closures 18

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

STATE PLAN FOR SE Title VI FFY2014 and FFY2015:

Obstacles: The obstacles for Title VI program for FFY2014 and FFY2015 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment and long-term supports for individuals with other behavioral health issues has seen a decrease in funding, CRP, and supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports.

Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

The WIOA performance accountability indicators are a new requirement which ORS will incorporate into its performance review in the next State plan.

COMPLIANCE WITH STANDARDS & PERFORMANCE INDICATORS for FFY2014 and FFY2015

As a result of not making Standard 1 and 2 for FFY2012, the Office of Rehabilitation Services, as directed by Section 107 of the Rehabilitation Act, was placed on a Program Improvement Plan that both were resolved in FFY2015.

In FFY2014 and FFY2015, ORS met Standard 1 and 2. For FFY2015 ORS again 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. With the goal of maintaining the highest quality of service to customers, the Strategic Planning Supervisor **has continued 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.

ORS maintained a focus on increasing quality employment outcomes as per the CNA Strategic Plan and RSA 107 monitoring report. In October of 2015, R.I. had the highest unemployment rate in New England of 5.3%. While Indicator 1.5 was not met, improvement was noted for the third consecutive year with an average hourly wage of \$12.05 for FFY2015. This represents an increase from the FFY2014 hourly wage of \$11.46.

FFY2015, ORS met RSA Standard I - **VR's impact on employment and Standard II** - Minority Service Rate.

Evaluation Standard 1 - Employment Outcomes

Performance Indicator 1.1: In FFY2015, ORS achieved 643 successful employment outcomes. This **is an increase from the FFY2014's 608 successful employment outcomes.**

Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate. FFY2015 saw an increase in the rehabilitation rate to 69.2% from the FFY2014 rate of 59.61%

Performance Indicator 1.3: ORS exceeded the Federal Standard earnings ratio of 72.6% in FFY 2015 with a rate of 99.7%, which represents an increase from FFY2014 rate of 99.3%

Performance Indicator 1.4: ORS exceeded the Federal Standard of 62.40%, with a rate of 100% for both FFY2015 and FFY2014.

Performance Indicator 1.5: ORS continues face challenges in meeting this indicator in part due to the RI economy and did not meet the Federal Standard of .52%. ORS saw a slight improvement over the FFY2014 rate of .50% with an average hourly rate of .51% earned by individuals in FFY2015. An additional challenge is the Bureau of Labor Statistics (BLS) data runs about three quarters behind, which impacts the ability to accurately calculate and monitor progress toward this goal.

Performance Indicator 1.6: ORS continues to exceed the federal standard of .53%. The number of individuals whose own income at the time of exit from services was their largest source of support was 64.3% in FFY2015. This result represents a slight decrease from FFY2014 rate of 64.4%

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 FFY2015 with a rate of .84%. This also represents an increase from the FFY2014 with a rate of .80%.

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

- I& E funds were used to support the licensing fees for two Project Search pilots as part of the ORS Pre-ETS initiative.
- ORS utilized I&E funds for State Rehabilitation Council and State Independent Living Council activities.
- ORS used I&E funds for CRP trainings.

q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

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

OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree, as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health, representation on the Developmental Disabilities Council, and the RI Transition Council. ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. 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.

SUPPORTED EMPLOYMENT SERVICE DELIVERY:

ORS has employment services that are available to adults and in-school youth found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. This recently negotiated Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, **resulted in a Governor's proclamation declaring that RI is an Employment First state.** The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services. Although ORS has not funded workshop settings for over 15 years, other funding streams continued to direct resources to segregated workshops and day programs. Staff resources were therefore unavailable to support integrated competitive employment efforts for adults and

transition-age youth with significant behavioral health and developmental disabilities. The DOJ/State Consent Decree mandated RI to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment.

The three state entities have developed a Transition timeline for staff, families, and school personnel **to clarify each agency's obligations to implement the DOJ/State Consent Decree requirements for in-school youths' access to employment exploration and work experiences. ORS has had a** Cooperative Agreement with RIDE for over 16 years and a very robust presence at each high school in the state to assist with and provide transition-related services. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of Transition Services and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Vocational Evaluations and Assessments; Community-Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences, Summer Work, Project Search, and other work activities. The array of ORS transition services in place for both in-school youth with disabilities and those youth eligible for Supported Employment services meet the requirements of WIOA and the DOJ/State Consent Decree.

SUPPORTED EMPLOYMENT AGENCY NETWORK:

ORS has a long standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental disabilities and behavioral health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.

ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer selected CRP. The objective of the SE services is an integrated competitive employment outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for **and included in the customer's ORS Individualized Plan for Employment (IPE). These plans are** individualized and define the scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: (1) to individuals with disabilities found eligible for SE Services and a limitation of extended services to 24 months for adults and 48 months for youth with disabilities. The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the time restrictions of ORS (as per RSA) and the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

Due to the complexities of implementation of the DOJ/State Consent Decree, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRP. Those meetings focus on service delivery, a target of 20 hours/week as an expectation of employment goal, and offer support and guidance to the providers.

ORS has taken the lead on identifying and establishing qualifications for employees of mental health agencies and developmental disability agencies to ensure that staff have the expertise appropriate for the vocational services being provided to ORS clients. ORS has been working with the Sherlock Center for Disabilities and VocWorks 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 commitment. The CRP Supervisor actively meets with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. 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 in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and 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.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also 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. 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 designed and implemented in FFY2014 is being re-evaluated in FFY2017.

2. The timing of transition to extended services.

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability **and Hospitals (BHDDH), are planned for and included in the ORS customers' Individualized Plan for Employment (IPE).** The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to RSA and WIOA, limits extended SE funding to 24 months for adults and 48 months for youth with disabilities age 14-24 with most significant disabilities.

The IPE also identifies that the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. 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 job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the extended supports provided solely by the CRP is defined by RSA..

Certifications

Name of designated State agency or designated State unit, as appropriate Rhode Island
Department of Human Services/Office of Rehabilitation Services

Name of designated State agency Office of Rehabilitation Services

Full Name of Authorized Representative: Ronald Racine

Title of Authorized Representative: Associate Director

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of

the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

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

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

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

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

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

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

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

Footnotes

Certification 1 Footnotes

* Public Law 113-128.

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

Certification 2 Footnotes

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

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services

portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

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

Certification 3 Footnotes

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

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

Additional Comments on the Certifications from the State

Certification Regarding Lobbying — Vocational Rehabilitation

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title

31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization Rhode Island Department of Human Services/Office of Rehabilitation Services

Full Name of Authorized Representative: Ronald J. Racine

Title of Authorized Representative: Associate Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying – Supported Employment

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

Applicant's Organization Rhode Island Department of Human Services/Office of Rehabilitation Services

Full Name of Authorized Representative: Ronald J. Racine

Title of Authorized Representative: Associate Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

Assurances

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

1. Public Comment on Policies and Procedures:

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

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

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

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

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

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds No

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: No

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. No

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

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services:

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

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above No

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.

g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.

i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

j. with respect to students with disabilities, the State,

- i. has developed and will implement,
 - A. strategies to address the needs identified in the assessments; and
 - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

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

a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for

individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

- i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
- ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State

Amended:

1. ORS conducted a public hearing on 11/21/17 about the need to close Category 1 and take individuals off the waiting list by date of application as funds become available for their VR services. In addition, communication with the SRC, Disability Law Center, Department of Labor and Training, BHDDH, legislators, RIDE, and the vendor community has occurred. 2. The designated State agency

or designated State unit, as appropriate, assures it will comply with the requirements related to: c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. Yes.