

**PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION
(COMBINED OR GENERAL)**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	Vacant	
Parent Training and Information Center	vice 1st term	11/2023
Client Assistance Program	vice 1st term	11/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2nd term	11/2023
Community Rehabilitation Program Service Provider	2nd term	11/2022

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Business, Industry, and Labor	Vacant	
Disability Advocacy Groups	1st term	9/2021
Current or Former Applicants for, or Recipients of, VR services	1st term	9/2022
Section 121 Project Directors in the State (as applicable)	2nd term	9/2019
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	Vacant until Dept of Ed fills position	
State Workforce Development Board	Vacant	
VR Agency Director (Ex Officio)	1st term	5/2022

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

ORS and SRC consistently meet throughout the year, which includes several executive board meetings, several full council meetings, an annual planning day, and other meetings regarding best practices in vocational rehabilitation that are not annually scheduled. ORS works in conjunction with the SRC to promote individuals to take an interest in joining the SRC. These individuals can come from a number of areas including employers, parents of individuals with disabilities, educators, students in vocational rehabilitation programs, customers/past customers of our vocational rehabilitation program, etc.

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

Goals of the Council

The Workforce Innovation and Opportunities Act charges the State Rehabilitation Council with meeting the following goals:

- Review, analyze, and advise ORS regarding the performance of their responsibilities in planning, developing, and implementing services to persons with disabilities to affect competitive employment outcomes,
- Advise and assist in the application of the State Plan, strategic plans, reports, needs assessments, and evaluations required under the Rehabilitation Act of 1973, as amended,
- Conduct a review and analysis of the effectiveness of consumer satisfaction with the functions and activities of the State Agency as they relate to competitive, integrated employment outcomes,
- Advise the State Agency and provide for working relationships between the State Agency and the Statewide Independent Living Council (SILC),
- Perform such other functions as the Council deems appropriate and that are comparable to the other functions performed by the Council, and
- Prepare and submit an Annual Report to the Governor and the Rehabilitation Services Administration (RSA).

In 2023, members of the Council assisted ORS with reviewing ORS State Plan updates. The State Plan, Policy, and Quality Assurance Committee of the State Rehabilitation Council (SRC) leads the SRC to provide meaningful comments and feedback to ORS. The committee leads the review of the quality of ORS service delivery to ORS customers by engaging in commentary on plans and policies, the Comprehensive Needs Assessment (CNA), and the vocational rehabilitation portion of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. During the last few years, the committee's focus was working with ORS to produce a monthly survey of consumers. This data is used as part of ORS's CNA and was incorporated into the State Plan update. In the later part of this year, the SRC received the ORS State Plan updates. The SRC initially began to plan the work. This process resulted in engaging more Council members to participate in the work of the State Plan to capture diverse voices that could bring different perspectives and provide meaningful feedback to ORS. The initial stages of planning consisted of receipt of the updates to the state plan from ORS. The SRC then requested that ORS meet with the members of our Council on a weekly basis for a total of five weeks to explain the changes in each section. ORS did meet with the SRC and provided a helpful framework and highlighted important issues. The Council found this to be immensely helpful and the work continued through the process until the SRC submitted final comments to ORS.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

On behalf of the State Rehabilitation Council, we appreciate this opportunity to provide the following comments and recommendations regarding rehabilitation services (VR) portion of the

Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2023 select Office of Rehabilitation Services (ORS).

The SRC's comments related to the Combined State Plan are the culmination of input from a variety of constituencies, including acknowledgment of the comments from Disability Rights Rhode Island and individual members of the State Rehabilitation Council.

The comments provided relate to areas in need of clarification or suggest changes to the language of the State Plan. Sections of the plan that did not warrant comment are not addressed in this letter.

(a) State Rehabilitation Council

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B): [check box] (A) is an independent State commission.

(B) has established a State Rehabilitation Council.

In Rhode Island's response to the COVID-19 pandemic, Executive Order 21-72 enabled public bodies covered by the Open Meetings Act to meet virtually. This was an enormous advantage for all attendees, but particularly for vulnerable individuals with disabilities. Once Executive Order 21-72 expired, these groups now meet in person. The SRC is concerned that not allowing virtual meetings has had the effect of discouraging individuals with disabilities from serving on the Council and attending meetings, thereby limiting the voices of these individuals in government on significant matters that affect their wellbeing and everyday lives.

Before COVID, and during the pandemic when Executive Order 21-72 was in place, the Council had an abundant membership, meeting all required membership areas except for two vacancies in Business, Industry, and Labor. The SRC had good recruitment and participation, in part due to the use of telecommunications (i.e., platforms like Zoom) for its meetings. Once the more severe danger of the pandemic passed, the State removed the ability for councils and commissions to meet virtually, for voting members. At this point, Council membership dropped by more than 50%, including two members representing Business, Industry, and Labor. The SRC also lost two members who represented former clients of ORS and one former client of ORS. The Council lost three members from the Department of Education, one working with transition, and the other two working with collaboratives in different parts of the state.

Over the past year, the Council has collaborated with the Governor's Commission on Disabilities, and other state organizations representing all Rhode Islanders, to get the telecommunications participation for voting members reinstated, but the issue has stalled in the State Legislature.

Given the nature of this Council, and the number of people who either have a disability that makes them susceptible or have a vulnerable disabled child of family member at home, it is not surprising that concerns around COVID have diminished its in-person numbers. The SRC is currently working on new recruitment ideas and will seek help from the National Coalition of State Rehabilitation Councils, as well as the Office of Rehabilitation Services to assist us with this. The SRC welcomes help from ORS with recruitment of new membership.

(b) Comprehensive Statewide Needs Assessment (CSNA)

The SRC worked with DRRI and ORS on the Comprehensive Statewide Needs Assessment. The responses to the survey concerning areas of need were wide-ranging. It is concerning that RI ranks 19th in the US for employment of individuals with disabilities, with only 40% of adults with disabilities employed in Rhode Island.

ORS staff has requested that the agency provide services for job development, job clubs, vocational evaluations, etc., within ORS, rather than relying on CRP vendors to provide these services. The Council supports this approach, given some of the other findings of the CSNA. For example, ORS staff noted that clients often had other barriers to employment (the fear of losing benefits, social aspects of work). ORS Counselors would be in a unique position to be more actively involved and have the ability to address these other barriers with clients if these services were to be provided in-house at ORS.

The SRC had the following questions regarding this section of the plan.

1. How is ORS enhancing the Sherlock Plan?
2. Are there things ORS can do to alleviate the fears of losing Social Security benefits?
3. What types of outreach are being done with vendors?
4. What other training does ORS offer to meet service delivery needs by providing training to vendors?
5. Could ORS be more specific about the training?

(c) Goals, Priorities, and Strategies

ORS recognizes that one challenge with engaging students who have 504 Plans is the stigma of identifying with a disability. The SRC suggests arranging contact with successful individuals with disabilities in a variety of fields. Exposure to professionals with disabilities can help to reduce some of the misconceptions that remain and might make students with 504 Plans consider engaging with ORS. In addition, the rebranding/renaming of Vermont's VR agency seems to have met with success by removing the word "rehabilitation," which is often misunderstood by both younger people and employers. The SRC would like to know if ORS has more specific plans to move forward with their own rebranding efforts.

(d) Evaluation and Reports of Progress- VR and SE Goals

ORS shared that it has been unable to form an alignment methodology of On-the-Job Training (OJT) but will continue efforts with DLT. The SRC would like more information on how ORS plans to alter its strategy to make OJT possible.

The SRC is pleased that ORS has continued the Project Search initiative. As reported in the State Plan update, the engagement of an out-of-state vendor has produced positive initial results, engaging two prominent businesses to help develop relationships with businesses in Rhode Island.

Additionally, ORS encouraged vendors to provide a full continuum of SE Services including Pre-ETS and worked with providers to explore impediments to service delivery and strategized solutions to overcome obstacles. ORS also reviewed fee structure and increased fees for services for many services to allow CRPs to have a more stable workforce and fiscal outlook.

The SRC feels these are positive moves forward. However, the SRC would like to see more vendors and employment agencies, like Goodwill Industries of Rhode Island and other agencies with a broader range of services.

(e) Supported Employment Services, Distribution of Title VI Funds

ORS's investment in a strong presence for transition-aged youth at high schools pursuant to the DOJ consent decree is helping to keep the focus on the expectation of successful employment outcomes for students with disabilities, as well as the services that are needed to achieve employment that ORS can provide. The SRC acknowledges that ORS is committed to providing extended services for supported employment up to age 25 for individuals with the most significant disabilities. We would like to see ORS invest as strongly in the initial years of transition planning (beginning at age 14, as required by state and federal law), as beginning services at this time result in better outcomes for job placement and success as youth approach age 25.

(i) Comprehensive System of Personnel Development

ORS has revealed in recent years that recruitment and retention issues remain a concern. Currently, some Supervisors are taking on some of the caseloads of the Counselors in order to meet statutory requirements under the Rehabilitation Act. The SRC believes that ORS should be doing even more to attract new talented and qualified individuals, and we recognize the additional initiatives presented in this plan update. Without enough highly qualified staff, clients who need ORS services will be at risk of not reaching their goals of competitive, integrated employment.

The SRC remains concerned that the Counselor vacancies are destined to continue as more ORS personnel are retiring over the next few years and recruitment is not meeting the demand.

Additionally, compensation for RI ORS Counselors has been found to be not commensurate with that of neighboring states. These legitimate challenges need to be offset by innovative efforts to attract and retain qualified professionals.

The SRC recognizes that ORS has taken suggestions from previous updates to the plan and has looked for creative ways to address its staffing deficiency. For example, ORS has recently hired five (5) Rehabilitation Technicians who function as case aides to assist Rehabilitation Counselors until additional master's level staff can be hired, or other options are developed. The SRC would like to see the establishment of a program that would provide these Rehabilitation Technicians with the financial support needed to obtain the education and experience to meet the ORS master's degree requirement (i.e., substantial tuition assistance). Adding a tangible incentive to the mentoring and real-world experience that ORS already provides could create a stream of qualified candidates who are able to pursue the credentials needed and move into the role of Rehabilitation Counselor. The SRC supports ORS's efforts to create a pathway for non-master's degree candidates to move into the Rehabilitation Counselor role.

(l) Interagency Cooperation with Other Agencies

State programs conducted under section 4 of the Assistive Technology Act of 1998:

The SRC urges ORS to educate consumers about DRRI's ability to assist consumers who are experiencing delays or denials regarding Assistive Technology devices or services. Additionally, the ability of ORS to provide in-house training is a step toward maintaining and increasing the number

of referrals for AT services and devices through ORS. Training must also include the fact that AT is excluded from ORS's comparable benefit requirement.

Noneducational agencies serving out-of-school youth:

Out-of-school youth remain an underserved or unserved population and reaching those youth is critical. The State Plan must identify the reasons the subcommittees for youth did not meet this year, and whether these meetings are scheduled to resume in 2024 (and if not, why that is).

Additionally, with respect to employment goals and skilled job opportunities, SRC requests that ORS provide more specific information regarding outcomes and goals within the State Plan.

The Council was unsure of which section to apply to the following topics.

Community Rehabilitation Program (CRP)

1. ORS has described training opportunities for CRP staff. The SRC would like to know how effective is the training? Has it led to better outcomes for ORS customers?
2. SRC wanted to see data in general (e.g., What percentage of the ORS budget is devoted/spent on Supported Employment? What percentage of the total ORS caseload is non-Supportive Employment or and Pre-Employment Transition Services?)

Thank you for the opportunity to comment on the update to the two-year VR portion of the Combined State Plan. We are encouraged by the changes ORS has implemented based on needs assessments over the past few years. We look forward to a continuing collaboration to ensure that all Rhode Island residents with disabilities will have equal access to employment services and jobs of their choosing in settings of their choice.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

The Office of Rehabilitation Services (ORS) thankfully appreciates the following opportunity to respond to the comments and recommendations from the State Rehabilitation Council (SRC) of the VR portion of the 2024 Combined State Plan. ORS has addressed each comment in the order in which the SRC presented them.

(a) State Rehabilitation Council

ORS thanks the SRC for contributing to this section of the state plan, while providing helpful and valuable information that represents the how and why of the composition of their council. ORS is delighted to hear that the SRC welcomes help from ORS with recruitment for SRC new membership and would like to collaborate with the SRC on building joint strategies for recruiting new members, such as:

- Collaborating with community organizations such as Independent Living Centers (ILCs) to identify potential SRC candidates.
- Partnering with ORS to create and launch a targeted advertisement campaign encouraging VRC's to identify potential SRC candidates.

- Planning and holding SRC recruitment events to identify potential SRC candidates.
- Increasing availability and accessibility of SRC materials online and developing a robust communication, marketing, and branding strategy for SRC.
- Developing print and social media recruitment strategies with the committee, in addition to eliciting suggestions to the committee for any additional recommendations for the most effective print and electronic media materials to reach potential committee members.
- Ensuring that as a council vacancy opens, the SRC chair(s) will recruit, recommend, and consult with the Governor's Office to ensure membership compliance with the Rehabilitation Act.
- Working with the SRC to actively recruit and outreach with business and disability organizations to educate them on the services of ORS and the purpose of SRC.
- And continually reviewing and updating the SRC portion of the ORS website and explore including an informational video to be developed in conjunction with the SRC.

(b) Comprehensive Statewide Needs Assessment

ORS thanks the SRC for their comments in this section. ORS continuously strives to deliver excellent service to individuals with disabilities in RI. With this being our primary goal, percentages and rankings are secondary. However, ORS is proud of the fact that RI ranks 19th in the US for employment of individuals with disabilities. This figure means that RI is in the top 62nd percentile and out-performing 30 of the other 49 US states, with only 36% (18 of the 49 other) of US states out-performing RI. Additionally, ORS strives for ALL Rhode Islanders with disabilities to be employed. Rhode Island has been an Employment First State since 2014. As of 2022, the national average of adults with disabilities who are employed is 21.3%. ORS is proud of efforts here in RI that have resulted in a nearly doubling the national average statistic.

ORS thanks the SRC for their questions on how ORS could collaborate efforts on enhancing the Sherlock Plan and alleviating individuals' fears of losing social security benefits. ORS continues to work with the Sherlock Center Work Incentive Planning and Assistance (WIPA) program to provide valuable information to individuals receiving SSI and SSDI through orientations and other public forums. Our Assistant Administrator of Supported Employment is on a committee with other State Agencies and other collaborators to increase usage and awareness of the Sherlock Plan and to create marketing techniques to alleviate the fears of working while collecting social security benefits.

ORS thanks the SRC for asking about outreach to vendors and training that ORS offers to vendors regarding service delivery needs, and acknowledging the great efforts ORS has made with our vendors. ORS is proud of efforts from our Business Engagement Specialist Team (BEST) who work with our Assistant Administrator of Vendor Affairs & Workforce Development, Assistant Administrators for Supported Employment and Transition towards continuing the good relations with our CRP's, helping them to increase the number of services offered and the ongoing efforts they take to recruit new CRP's and services for individuals open and active with ORS. ORS recently sent out a survey for innovative strategies to CRPs and met individually with each to identify and incorporate new ideas and strategies for services. ORS also works collaboratively with BHDDH via the Sherlock Center on regular scheduled Behavioral Health and Developmental Disabilities

Supported Employment Council meetings to deliver training, best practice technical assistance, and strategize how best to meet the needs of the mutual clients each agency works with.

(c) Goals, Priorities, and Strategies

ORS thanks the SRC for their comments pertaining to this section. ORS is committed to exploring how best to initiate and move forward with agency rebranding, as Vermont and Massachusetts have both done, to promote awareness of ORS services and increase hiring initiatives for individuals with disabilities while working on lessening the unintended stigma of the word “rehabilitation.”

(d) Evaluation and Reports of Progress – VR and SE Goals

ORS thanks SRC for their comments on this section and in particular, OJT and CRP's. ORS is currently exploring ways to model our efforts after the DLT work immersion program. ORS continues to collaborate with DLT on these efforts and hope to have resolution during this State Plan. Additionally, ORS has added more services – including virtual options -- and increased fees paid to our vendors. Offering more employment and job development services is part of our ongoing efforts to increase service delivery needs.

(e) Supported Employment Services, Distribution of Title VI Funds

ORS thanks the SRC for their comments and concerns for transition-aged youth. ORS shares a large interest in this area. Our ORS Assistant Administrator of Transition is currently involved in a Pre-ETS program to expand ORS assistance to middle-school youth. ORS has reached out and presented to the School Guidance personnel at the RI School Counselor Association Conference. The hope was to educate school counselors and guidance counselors on ORS services, as in many schools the 504 coordinators are guidance personnel. ORS also has a VR Counselor assigned to every public high school as well as private and alternative schools, where they meet with guidance departments and teachers to discuss and educate on the benefits of ORS services and make referrals. ORS currently has Pre-Employment Transition Services (Pre-ETS) that start at age 14 in the Middle School and continue to age 22. Our earliest service is a work readiness 101 program for Middle School students, which begins with developing an understanding of the job market, employer expectations, and how to match interests with careers. We have a wide range of services specifically developed to give youth in transition many opportunities to be well developed and ready for post school success. These services include Work Readiness, Job Exploration, Community Based Work Experiences, Summer Work Experiences, Summer Employment Alliance, Project Search, Tri-Employment, Interviewing Skills, STARTURI and Rhode to College. We also collaborate with partners and school districts for student events that include the College Forum and Dare to Dream. ORS has also worked collaboratively with our CRPs to expand our Pre-ETS deliverables to those students who will require supported employment supports to gain employment, preparing them earlier with the knowledge and skills they need to be successful prior to exiting high school as well as working collaboratively with families, fellow state partners, schools, and CRP's in connecting them with the appropriate long term supports as they transition into post high school life. Our ORS Assistant Administrator of Transition is currently involved in a Pre-ETS program to expand ORS assistance to middle-school youth. Additionally, the five new Rehabilitation Technicians at ORS are assisting our agency in working with our Youth in Transition, from students with disabilities starting in Middle School and participating in Pre-ETS to our out-of-school youth up to age 24.

(i) Comprehensive System of Personnel Development

ORS thanks the SRC for their comments and suggestions on ORS personnel development. Despite ORS staff covering some extra caseload duties, this is not new to the culture and dynamics of ORS personnel. Our counselors and supervisors consistently extend their help in any way they can to improve the strength of service delivery to our consumers. This practice has been ongoing for many years, with or without caseload vacancies, to improve the lives of our consumers, along with sustaining a high degree of value to our agency. ORS has always had a culture of helping those in need, which is reflective upon the consistent integrity and dedication of ORS staff.

ORS thanks the SRC for mentioning their findings of ORS staff compensation not being commensurate with that of neighboring states. The majority of ORS staff are union employees, with wages fixed by the Department of Administration (DOA). As a result, ORS administration does not have the ability to alter staff compensation. Additionally, neighboring states offer more teleworking options to their staff as part of their flexible compensation and union contracts. Even though ORS supports a healthy mix of teleworking, fieldwork, and office working, the Department of Administration dictates the mechanic of the telework program.

ORS thanks the SRC for recognizing the efforts ORS continues to take towards fully staffing our agency and noting our recent hiring of five Rehabilitation Technicians who function as assistants to our Rehabilitation Counselors. A point of clarification, these Rehabilitation Technicians are not case aides and function to help Rehabilitation Counselors with some data and record collection and Pre-Employment Transitions Service monitoring. ORS has undertaken many efforts outlined in the 2024 Combined State Plan in our ongoing pursuit of recruiting new staff members to our ORS team.

ORS would like to thank the SRC for their suggestion that ORS provide incentives and tuition assistance that might help the Rehabilitation Technicians to obtain the education and experience to meet the ORS master's degree requirement. ORS has provided the Rehabilitation Technicians information about RSA-funded Rehabilitation Counseling programs. Such initiatives are a longer-term option for ORS. However, ORS thanks the SRC for supporting ORS's efforts to create a pathway for non-master's Rehabilitation Counseling degree candidates to move into the Rehabilitation Counselor role." ORS is thankful to have support from the SRC in finding alternate methods to help fill vacancies.

(1) Interagency Cooperation with Other Agencies

ORS thanks the SRC on their comments and concerns in this section, particularly regarding Assistive Technology (AT) and out of school youth. ORS continues to monitor the Assistive Technology Access Partnership (ATAP) Federal Contract and Adaptive Telephone Equipment Loan Program (ATEL) which provides access to assistive technology for device loan equipment, training, access to training, and to make informed choice. ORS continues to support individuals with access to assistive technology and training to support vocational goals through a fee-for-service model. ORS recognizes that individuals predominantly have a personal cell phone or access to a tablet, and these can be effective as a vocational tool to assist with executive functioning needs and job support. ORS has partnered with assistive technology practitioners, has offered training, continues to update the assistive technology knowledge base, and will continue to offer training to ORS Supported Employment Counselors on the benefits and utilization of assistive technology as a job retention tool. ORS has been collaborating with BHDDH (DD and Behavioral Health) on this

effort through Supported Employment Council (SEC) meetings and working with BHDDH via their NEON Grant and DD Supports specifically related to assistive technology.

Finally, ORS would like to thank the SRC for the continued partnership and commitment to improve and expand on the services that ORS provides to individuals with disabilities. We thank the SRC for asking for data towards a better understanding of the efficacies of VR service delivery. We will work with the SRC during this Plan to devote time in meetings to delivering this data along with some necessary background. We look forward to working together to provide the best services that vocational rehabilitation can offer to clients and participants.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:
 - A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

ORS will:

1. Continue increasing the capacity and knowledge base of CRPs who provide Supported Employment services;
2. Continue to improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking;
3. Explore available options for Transportation to services;
4. Increase the capacity of CRPs to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment;
5. Look to CRPs to continue to develop a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities and to expand the number of qualified trained personnel to allow for the provision of supported employment services.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

ORS will explore:

1. Enhancement of the cultural competency of ORS staff and CRPs to specific minority populations within the State

2. Incorporate interpretation and communication needs into the IPE for underserved, unserved and minority populations
3. Engagement of the American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian communities through outreach and marketing strategies.
4. Increased access to services for individuals who are not English-speaking or have English as a second language.
5. Ensuring services are readily available for emerging populations/minorities.

The Comprehensive Needs Assessment (CNA) completed in 2021 identified the following as the most unserved/underserved populations served by the VR program:

1. Those with Physical Disabilities
2. Those with Intellectual and Development Disabilities
3. Those with Behavioral Health/Mental Health
4. Those with Blindness/Visual Impairment

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE
WORKFORCE DEVELOPMENT SYSTEM; AND

ORS will explore:

1. Better collaboration between ORS, WIOA partners and the Workforce Development System through communication, information sharing, meetings, and training.
2. Collaboration with the Workforce Development System to improve service delivery to Cape Verdean, American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian
3. Dissemination and/or awareness of resources available through the workforce development system and increased awareness of employer resources
4. Increased outreach to individuals with behavioral health concerns, those who are deaf/hard of hearing, and those with communication disorders and respiratory disabilities are the most unserved/underserved by the Workforce Development System.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR
PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

The SRC and ORS identified the following areas that could yield a high rate of success for all entities involved in the vocational rehabilitation process of need for ORS:

1. Increase student and parent awareness of the full scope of services available from ORS and what services ORS may, or may not, fund.
2. Assist the public to develop a better understanding of the ORS process and scope of services by ORS.

3. Work in conjunction with CRPs to assist individuals with disabilities in overcoming personal barriers towards obtaining and maintaining employment.
4. Increase the amount and frequency of services provided to underserved and emerging populations.
5. Market and alleviate the stigmas of disabilities in the workplace to bridge the gap between employers and individuals with disabilities.
6. Ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment plan.
7. Explore grants/funding sources such as Youth Build Grants.
8. Further explore and enhance service capacity for underserved/unserved individuals such as beneficiaries of SSI/SSDI.
9. Consider strategies on how to better connect to “at-risk” students outside of the schools, including those in juvenile correction and residential placement.
10. Provide education so that students who report feeling stigmatized/labeled understand the rehabilitation process better and become more engaged.
11. Expand outreach to other programs, such as youth centers, family resource centers, and career and education programs.
12. Strengthen connections to higher education, particularly disability support service coordinators, to increase access to unserved/underserved youth and students with disabilities.
13. Assist schools in increasing communication, access, and coordination for “at-risk” youth and students with disabilities who generally are not utilizing ORS services.

The 2021 Comprehensive Needs Assessment (CNA) identified 24,548 students between the ages of 3-21, in RI, with IEP's. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc. Students with 504 plans are underserved and students with behavioral health concerns are also an underserved population.

ORS continues to enhance and expand access to Pre-ETS including those students in juvenile justice system, an additional unserved/underserved population.

“At-risk” students with learning disabilities who at times do not want to be identified as having a disability; and therefore, are not potentially accessing services.

Students indicated a positive experience with ORS, and that the referral process was seamless. Students also indicated job explorations in different employment fields and internships in those settings are important to them, as they indicated their top priority is working in a setting that interests them.

Per the CNA, students (and their parents) indicated they are unaware of the full scope of services available to them from ORS and what services ORS may, or may not, fund. Parents stated that communication between all professional team members on behalf of the student is a key to success.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

The 2021 CNA identified a need to further remove the following barriers in order to strengthen the quality of services from CRPs:

1. Finding solutions to transportation barriers, finding ways to maintain CRP staff, providing easy access to benefits counseling and community-based jobs.
2. Fear of losing Social Security benefits, medical coverage, raising family expectations, raising individual expectations, finding solutions to issues with home life and lack of social skills are the most common personal barriers for individuals with disabilities who are seeking employment.
3. Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
4. To assess CRPs' ability to work with varying populations and disabilities and find ways to improve delivering services and better employment outcomes.
5. Develop or identify more behavioral health vendors with the training and capacity to provide vocational services.
6. Assist CRPs to meet service delivery needs by providing training to vendors, strengthening communication with vendors, and assisting vendors with report writing skills.

Meeting the needs of the Business Community:

1. Increase marketing and awareness of ORS services.
2. Enhance presence at business expos, job fairs and continue an ever-increasing online presence via agency website, social network platforms, etc.
3. Provide Business Community with information on ADA and workplace accommodations.

During FFY 2019/21, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

1. Community Comprehensive Needs Assessment Surveys for community rehabilitation providers (CRP)
2. Employer Comprehensive Needs Assessment Survey
3. Customer Satisfaction Survey
4. Environmental Scan of Data including Department of Labor & Training data, Bureau of Labor Statistics, Disability employment statistics, US Department of Labor, RI Department of Education, Kids Count, Social Security Maximus/RI Ticket to Work Program and the Office of Disability Employment Policy
5. Office of Rehabilitation Services Staff Comprehensive Needs Assessment Surveys
6. Focus group with transition age youth/consumers and parents and ORS staff members.

The Employer survey was completed by 13 employers throughout the state of RI. The employer survey yielded the following areas as needs:

1. Access to or knowledge about accommodations, safety concerns, and having the skills to do the job were the largest challenges faced when hiring a person with a disability.
2. Assess to or knowledge of persons with disabilities need for time off, dependability to come to work, getting hurt, and potential lawsuits were the largest concerns in hiring people with disabilities.
3. ORS could perform marketing through public service announcements, commercials, signs, a larger online presence and/or a website directory for potential job candidates that employers can access as ways ORS could be viewed as a viable workforce.

The Employer survey also indicated that:

1. Diversity, work ethic, and performing the job duties were the largest rewards in hiring individuals with disabilities. Good candidates with qualifications (the primary motivation in employing people with disabilities)

CUSTOMER SATISFACTION SURVEY

The 2 ORS re-designed monthly consumer satisfaction surveys (completed with input from the SRC State Plan, Policy and Quality Assurance sub-committee) was designed as an ongoing tool to be distributed at set intervals, and provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS, are in post-employment plan services and employment status. The re-designed surveys assist in capturing WIOA data, and undergoes continued phases of analysis as an ongoing process.

The conclusions formulated on the results of the Surveys conducted between April 2020 and March 2022 indicated the following needs:

1. ORS can improve services by increasing communication with consumers, helping customers obtain employment, networking with employers and increasing staff and resources.
2. Nothing, or already being satisfied with ORS services, was the second most occurring response.

Additionally, the Customer Satisfaction Surveys indicated that:

1. Supported employment, job placement, job development, and job coaching were indicated as the most important services.
2. Transition-aged individuals aged 14-24 were the largest population of survey respondents at 30% of all individuals who responded in the survey.
3. Individuals with mental health, developmental and cognitive disabilities were the most frequently identified of individuals who responded in the survey.
4. Response rate of those who identify as minorities rose since the 2021 CNA, with respondents indicating themselves 67.5% as White/Caucasian, 17.5% as Black/African American, 8% as Hispanic/Latino, 3.5% as American Indian/Alaskan Native and 3.5% as Asian.

5. Three-quarters of respondents indicated that ORS matched their stated employment goals, that they feel better prepared to enter employment, that their counselor responds to them within 2 business days, that they would recommend ORS services to family and friends, and that they receive SSI/SSDI.

The further conclusions based on the results of the surveys conducted between April 2022 and March 2023 indicated the following needs:

1. ORS can improve their services helping customers obtain employment, increase communication with consumers, helping customers obtain education, networking with employers.
2. Nothing, or already being satisfied with ORS services, was one of the most frequently occurring response.

Additionally, the customer satisfaction surveys from April 2022 and March 2023 indicated that:

1. Supported employment, job placement, job development, job coaching, and counseling & guidance were indicated as the most important services.
2. Transition-aged individuals aged 14-24 were the largest population of survey respondents at 32% of all individuals who responded to the survey.
3. Individuals with mental health, developmental and cognitive disabilities were the most frequently identified individuals who responded to the survey.
4. Response rate of those who identify as minorities during April 2022 – March 2023 stayed roughly the same since the 2021 CNA, with respondents indicating themselves 72% as White/Caucasian, 17.33% as Black/African American, 11.33% Hispanic/Latina, 6% as American Indian/Alaskan Native and 2.33% Asian.
5. Over three-quarters of respondents indicated that ORS matched their stated employment goals and interests, that they receive services in a timely manner, and that they would recommend ORS services to family and friends.

ENVIRONMENTAL SCAN

The environmental scan included information from a variety of sources such as: 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, RI Department of Education, Kids Count, Social Security Maximus Ticket to Work Office of Disability Employment Policy. The sources indicated the following:

1. 31% of workers with a disability were employed part-time, compared to 17% of workers without disabilities.
2. People with disabilities were more concentrated in-service occupations (19%) compared to those without a disability (17%). PWD were more likely to work in production, transportation, and material moving (14%) compared to those without a disability (12%) and less likely to work in management, professional occupations (34%) and in Government (14%) compared to those without a disability (13%).

3. RI was ranked 19th in the nation for employing people with disabilities with 40.6% of individuals with disabilities in RI employed. Since the 2017CNA, jobs in RI fluctuated. From 2018 – 2019: RI gained jobs in retail trade, educational services, wholesale trade, arts, entertainment, recreation, natural resources and mining. RI lost jobs in professional services, business services, financial activities and construction. From 2019-2020: RI had a decrease in the job fields of accommodation, food service, health care, social assistance, professional/business service.
4. Kids Count data of youth in RI from 2018 – 2020 shows 3% of those aged 16-19 are out of school and not working; 11% of those aged 20-24 are out of school and not working; 9% of those aged 16 – 24 are out of school and not working. Over the past ten years, the number of out of school youth not working has declined by 5% in those aged 16-19, stayed the same in those aged 20-24, and declined by 3% in those aged 16-24.
5. Social Security/Maximus Ticket to Work RI data received for 6/30/2019 and 1/20/21 indicated that as of March of 2019, there were a total of 47,737 assignable beneficiary tickets in RI (currently not “in-use”). 32,149 of these tickets were in Providence County alone. As of January 2021, there were a total of 45,204 assignable tickets with 30,225 being in Providence County. ORS-RSA-911 data for PY20 quarter two reflected a total of 1,510 applicants indicating being on SSI/SSDI at time of application. Data suggest PWD in RI on SSI/SSDI disability are potentially an underserved population. It also suggests CRP education and program development on the benefits of becoming an Employment Network (EN) may be advantageous towards developing the continuum of employment network services for people with disabilities in RI. Currently, ORS and only one other EN is available within the state.
6. According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers and internship providers to partner with school districts to complete employability skills assessments and transcripts.

VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

ORS conducted two staff surveys in 2019 and 2020 to obtain information on how to improve service delivery, while remaining up to date with the evolving field of vocational rehabilitation. The first survey pertained to best business practices as a state agency. The second survey pertained to all descriptions directly related to WIOA-CNA focus areas.

The surveys reflected the following needs:

1. Sixty-six percent of staff indicated ORS should provide in-house services such as job development, vocational evaluations, job clubs, resume development, etc., directly, rather than relying on CRP's solely for consumer service delivery.

2. Fifty-six percent of staff indicated they were satisfied with the consumer services provided by CRP's. Services for individuals with behavioral health concerns, individuals with autism/ASD, individuals who identify as minorities, youth and individuals with anxiety rank as the top opportunities to improve outcomes for underserved or unserved groups.

Additionally, respondents indicated ORS can assist CRPs/vendors to meet service delivery needs by providing training to vendors, strengthening communication with vendors, and assisting vendors with report writing skills.

ORS should develop or identify more behavioral health vendors with the training and capacity to provide vocational services.

ORS can better collaborate with WIOA partners and the Workforce Development System through communication, information sharing, meetings, and training opportunities.

ORS continues to conduct staff surveys that will be incorporated into the 2025 VR Counselor Comprehensive Needs Assessment.

WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA):

As outlined by WIOA, and given the 21st Century understanding of the evolving labor force and the needs of individuals with disabilities, ORS staff indicated the following top 3 areas of training that would be most beneficial:

1. Employment trends/labor market information
2. Business engagement
3. Job development

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

ORS, in conjunction with the SRC state plan team, routinely met to review the format and content of the state plan. Additionally, ORS and the SRC developed a state plan timeline regarding drafts, reviews, completed sections, feedback, edits, etc. ORS' goals and priorities, regulations, 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.

The 2021 CNA and subsequent SRC review indicated four goals ORS should work on for FFY 2022 through FFY 2025. These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;
2. Increase services to underserved and unserved populations;
3. Bridge gaps between employers and individuals; and
4. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

(A) Support innovation and expansion activities.

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES

OBJECTIVE 1: Participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events.

1. Collaborate with the four Regional Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to present an Introduction to State Services to each public, private and alternative high school statewide to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.
2. ORS will conduct a monthly orientation to VR services in English and Spanish in order to increase referrals and applications for services and will explore providing orientations at the American job centers.

3. Collaborate, facilitate, and participate monthly with Sherlock Center and BHDDH on BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
4. Explore technical assistance from VRTAC-QM on how better to market ORS services to the public.
5. Develop video content/presentations regarding transition, general VR, SE, Pre-ETS, etc, and post on ORS website.
6. Develop an electronic "Introduction to ORS Transition Services" that will consist of necessary information about ORS and scope of services, including the Transition fact sheet, benefits counseling FAQ, and an introductory video; these materials could be customized to the individual VR Counselor and the students/districts they are working with.
7. Increase ORS on-line presence via LinkedIN, Work without Limits, Indeed, Facebook and other social media.
8. Present on ORS services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) and Rhode Island Rehabilitation Association (RIRA) events.
9. Conduct Liaison responsibilities training to staff.
10. Outreach to provider agencies and rehabilitation centers that have not referred in past two years to coordinate service orientation/presentation to staff and consumers.

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather and provide current information about business sector needs and state responses.

1. Disseminate information from the quarterly GWB meetings to VR Counselors.
2. Educate and partner with WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
3. ORS will explore collaboration with WIOA partners to enhance ORS Annual Employer Forum

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

1. Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD.
2. Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.
3. Increase business engagement activities by VR counseling staff via the internal Business Engagement Specialist Team (BEST) a group of dedicated VR counselors, supervisors and administrators who focus on increasing outreach to the business community.

4. Develop strategies to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.
5. Educate and require BEST members to utilize an internal tracking tool to monitor employers/business contacts, industries.
6. ORS will educate staff about job board.
7. ORS will conduct liaison responsibilities training for staff.
8. Identify increased employer penetration via annual report to WIOA/DLT/GWB reporting.

(B) Overcome barriers to accessing VR and supported employment services.

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 competitive integrated employment.

1. In-School Youth with Disabilities: enhance and expand 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. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS expanded its traditional Transition services to include middle school students with the goal of introducing Pre-ETS services at an earlier age. This will give students an earlier look at potential career interests and pathways as they enter high school. ORS hopes to continue to expand this service statewide.
2. ORS will collaborate with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students in order to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life.
3. ORS Transition Counselors will be working collaboratively with School Districts, BHDDH, and CRPs to give mutual I/DD students the opportunity to participate in a wide range of exploration and community experiences with the goal of obtaining and maintaining employment prior to exit from high school.
4. Under the consent decree ORS has been tasked with supporting school districts with the goal of employment for all students on a Career Development Plan (CDP) prior to exit from HS. ORS will be providing TA to schools around Job development and Job Coaching. ORS will also utilize our Business Engagement team to assist districts in identifying businesses in their areas willing to offer employment experiences and opportunities. ORS will offer SE JDP and coaching as needed to those students who have developed an IPE and have an identified job goal.
5. Adults with Disabilities: ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

6. Design and modify programs and services as changing needs of customers are identified based on CNA responses.
7. Utilize benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
8. Continue to ensure benefits counseling is provided to those on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.

OBJECTIVE 2: Ensure ORS materials meets the needs of populations being served and/or outreached to.

1. Partner with Dorcas International to identify underserved populations and identify specific needs for materials in alternative formats.
2. ORS will review data and determine alternate formats for underserved populations.
3. Work with WIOA Workforce Partners to determine additional needs of individuals not currently being served in the Workforce Development system with disabilities.

(C) 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, post-secondary education, employment, and pre-employment transition services); and

GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

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 competitive integrated employment.

1. In-School Youth with Disabilities: enhance and expand 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. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS has presented at the Annual RI School Guidance Counselor Conference to increase awareness of ORS services and referrals of 504 students. ORS continues to provide and expand career awareness to Middle School students and families.
2. Adults with Disabilities: ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
3. Design and modify programs and services as changing needs of customers are identified.
4. While the COVID restrictions have been lifted, the ORS will continue to offer these virtual services on a hybrid basis and will utilize them for individuals who are not able to

participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions, or disability-related issues. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been productive, especially when face to face employment services were not available. ORS has utilized the array of Virtual Services for Pre-ETS, Supported Employment and non-Supported Employment programming.

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

1. Identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice.
2. Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.
3. Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
4. Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
5. Continue to examine annually and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
6. Identify ways to continue to offer Virtual Service delivery options to optimize services to individuals who are unserved or underserved.

Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility.

1. Continue to identify gaps and strategize solutions in the Ticket to Work Program related to services and VR Cost Reimbursement process.
2. Acquire and onboard the J Morrow "Ticket" tracker system into the InFormed ECMS program.
3. Continue to explore development of Employment Network Partnerships.
4. Continue to enhance staff knowledge of the Ticket to Work Program, including work incentives, referrals to Employment Networks, such as Work Without Limits attending trainings, sharing of relevant WIPA trainings and information, etc.
5. Remain active with CSAVR TTW Peer to Peer monthly meetings and SSA Quarterly All VR meetings.
6. Explore development of a Social Security Ticket to Work internal liaison team.

7. Continue to ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.
8. Partner with Dorcas International to identify and reach out to culturally underserved populations to ensure awareness of vocational rehabilitation services.

(D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

GOAL 4: : Meet WIOA performance accountability measures for PY24 and PY25

Vocational Rehabilitation Program			
Program Year 2024		Program Year 2025	
Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) ²²	48.6		49.6
Employment (Fourth Quarter after Exit) ²²	45.1		46.1
Median Earnings (Second Quarter after Exit [1])	3549.00		3645.00
Credential Attainment Rate	33.7		34.8
Measurable Skill Gains	40.5		42.0

1. Utilize tools, data and technical assistance provided by RSA in determining the final negotiated levels of performance.

OBJECTIVE 2: Ongoing Strategies to Meet WIOA performance accountability measures.

1. Ensure the ECMS development encompasses the requirements for WIOA measures and data reporting.
2. Continue contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state.
3. Continue to educate staff to the importance of timely and accurate ECF documentation of the WIOA data elements.
4. Utilize ECMS to develop a reporting system to account for the increase/utilization of Pre-ETS services and their effectiveness.
5. ORS is involved in the second year of a grant-funded three-year pilot to measure effectiveness of Pre-ETS service.
6. Participate in Technical Assistance opportunities on capturing performance measures.

OBJECTIVE 3: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations.

1. Determine eligibility within 60 days of application.
2. Explore technical assistance with VRTAC-QM on Rapid Engagement Strategies regarding eligibility, plan development and movement to active services.
3. Determine and utilize presumed eligibility as relevant for SSI/SSDI disability recipients.
4. Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination.
5. Utilize MIS to track adherence to these standards on a quarterly basis; utilize individual performance targets for staff to aim for.
6. Educate VR Supervisors and staff on best practices and procedures on relevant utilization for eligibility determination and IPE extension process.
7. Educate VR Supervisors and staff on utilization of ECMS system through dashboard request to monitor their own 60-day and 90-day compliance and utilize performance targets to staff to aim for.
8. ORS supervisors and staff will utilize MIS system to better monitor annual reviews and IPE amendments to ensure service delivery to meet client's changing needs.

OBJECTIVE 4: Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers.

1. Review the current regulations and update procedures as needed based on QI data to ensure client access to services, supports and movement toward self-sufficiently and integrated competitive employment.
2. Review WIOA data contained in the RSA-911 and RSA Dashboard quarterly to assess agency outcomes, areas for enhancement and program development for staff, vendors, and customers.
3. Enlist VRTAC-QM as relevant to provide technical assistance.
4. Review relevant data and enlist support and assistance from SRC as relevant.
5. Continue monthly customer satisfaction surveys. Utilize findings to shape program development and service needs, vendor, and staff training.
6. Continue QI quarterly case reviews and targeted case reviews as relevant.
7. Utilize QI findings to shape procedural consideration, training needs, and program development.
8. ORS supervisors and staff will utilize QI resources to assist with monitoring of 60 day and 90-day compliance, annual reviews, and IPE amendments to ensure service delivery to meet client's changing needs.

OBJECTIVE 5: Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data.

1. Provide Staff Training and support as the agency transitions to new Electronic Case Management/MIS System.
2. Utilize the wage interface tool within the ECMS to upload reportable RI UI wage data.
3. Utilize available wage data tools such as the Work # available through DHS and State Wage Interchange System (SWIS) to capture WIOA Post Exit wage data for cases not available in the RI UI data base. Explore ability to develop a wage interface tool to upload SWIS data into the new ECMS for reportable data collection.
4. Continue to educate and enhance agency staff's knowledge and use of various electronic platforms that enhance the delivery of services to consumers such as Teams, ADOBE, virtual access, Sharepoint, Zoom etc.
5. Acquire and onboard the J Morrow "Ticket" tracker system into the ECMS program.
6. Continue to utilize and provide CareerScope, Virtual Job Shadow, and explore other tools and resources that may make VR Counselor work more efficient, such as SARA.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

The 2021 CNA and subsequent SRC review indicated four goals ORS should work on for FFY 2022 through FFY 2024. These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;
2. Increase services to underserved and unserved populations;
3. Bridge gaps between employers and individuals; and
4. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES

OBJECTIVE 1: Participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events.

- ORS participated as active members in various community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and four Transition events throughout the program year, and hosted one community forum.
- ORS collaborated with Regional Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) by presenting an Introduction to State Services to each public high school, as well as private and alternative schools, to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.
- ORS collaborated with Sherlock Center and BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase the knowledge base of providers and CRPs who offer SE. ORS also funds these monthly meetings to include specific topics that are directly related to the goals and requirements of the Consent Decree and overall Supported Employment services.
- ORS brought in Kincaid/Wolstein from Connecticut to work with Non-Supported and Supported Employment adults in the Northern region of Rhode Island. Kincaid is also capable of providing Executive Functioning Assessments for adults and students.
- ORS explored technical assistance from VRTAC-QM on how better to market ORS services to the public. ORS continues to work with the Department of Human Services Communications Team to expand and refresh our current social media communications.
- ORS has developed an electronic file “Introduction to ORS Transition Services” that consists of necessary information about ORS and scope of services, including the Transition fact sheet, benefits counseling FAQ, these materials are customized to the individual VR Counselor and the students/districts they are working with.
- ORS increased the Agency’s on-line presence via LinkedIn, Work without Limits, Indeed, Facebook and other social media. ORS has utilized these social media platforms to post Agency job vacancies. An Employment Network MOU was developed with Work Without Limits increasing our presence on their platform.
- ORS presented and participated at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) Rhode Island Rehabilitation Association (RIRA) events, Behavioral Health Work for Wellness, and Family Employment Awareness Training.
- ORS has contacted agencies to re-explore working together, but staff capacity at provider agencies is still a concern. ORS has offered training to new employees of the agencies in an effort to help with skill development.
- ORS has provided and enlisted TA to school districts two to three times on job development and job coaching.

OBJECTIVE 2: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather current information about business sector needs and state responses.

- ORS disseminated information about job leads via email to VR Counselors and BEST members daily.
- In collaboration with DLT, ORS and WIOA partners included requirements that target individuals with disabilities in their hiring initiatives.
- ORS has been unable to form an alignment for methodology of On-the-Job Training (OJT) but will continue efforts with DLT to explore possibilities.
- ORS has explored opportunities and presented with State Partners for collaborative and sequenced funding models for service delivery which resulted in a PowerPoint presentation and a booklet.
- ORS held two Employer Forums to allow BEST to assist with hiring needs of business sectors, as well as to increase disability awareness and reasonable accommodations.

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

- ORS continued to implement and coordinate Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD. ORS lost one adult Project Search site due to COVID but has since identified a new site to take its place. The new site is in the hospitality/service industry. ORS will be exploring sites in other locations of the State. ORS has three transition age Project Search programs, 2 hospital-based programs and one professional office-based program. This past school year had an 88% employment rate over the three transition programs.
- ORS continued to partner with DLT/RealJobsRI initiative to identify new employment opportunities in emerging business sectors for individuals with disabilities. The progress has been slow in this area because the focus has been on Consent Decree demands of the IDD population. Discussions are ongoing.
- ORS BEST has participated in Chamber of Commerce events, job fairs, employer forums, and direct employer contact to assess the needs of the business community.
- ORS sponsored and conducted an Employer Forum at Rhode Island College, where employers, partners and other state agencies were invited to attend and learn about the benefits of hiring individuals with disabilities and how to access that pool of potential employees. ORS plans to run this forum twice a year so that new businesses can be attracted, and current disability information and trends can be shared with the business community.
- ORS has had initial discussions to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR. Discussion and development of a strategy is ongoing.
- ORS has developed a draft version of an internal tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board. ORS has developed a Teams page for BEST activities including tracking tool.

- ORS was unable to utilize System 7 to create an accurate or useful employer database for staff to utilize and migration to Informed is pending. If these programs are ineffective then ORS will explore other software that will assist in tracking contacts. ORS will look to new MIS system, to see if tracking employers and employer engagement is an option.
- ORS identified increased employer penetration via annual report to WIOA/DLT/GWB reporting. Information and Support Services were provided to 25 employers. 26 employers were provided Workforce Recruitment Assistance and 5 employers accessed untapped labor pools.
- ORS reintroduced application, IPE development and competitive integrated employment productivity goals for all VR counselor staff and decided against introducing productivity goals for BEST members only.

GOAL 2: INCREASE SERVICES TO UNDERSERVED AND UNSERVED POPULATIONS:

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 competitive integrated employment.

- **In-School Youth with Disabilities:** ORS continued to outreach to 504 Coordinators. ORS presented at the Annual Rhode Island Guidance Counselor Conference to talk about services and referrals. ORS continued to expand services to the many school districts throughout the state.
- ORS continued to work with the Rhode Island Training School as well as having meetings with the Dept of Corrections to offer and coordinate services to those “at risk” youth exiting these programs. ORS has continually reviewed and expanded its traditional Transition services to meet the needs of school districts. This includes middle school students with the goal of introducing Pre-ETS services at an earlier age. This has given students an earlier look at potential career interests and pathways as they enter high school.
- ORS collaborated with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life. The challenge remains vendor capacity in providing customized employment. The Discovery School to Work pilot was completed and has created a best practice in coordinating services for students exiting high school and entering adult services.
- **Adults with Disabilities:** ORS has worked with the providers to identify obstacles to service delivery which led to a fee for service rate review and increase to ensure a wide array of service providers and training programs continued to be available. Several new vendors came on board to enable customers from underserved populations to participate in employment services.
- ORS continued to review, design, and modify programs and services as changing needs of customers are identified. An example would be changes to driving evaluations and instruction including instructors speaking multiple languages.

- ORS counselors have participated in CHARLAs by Lazo for Spanish-speaking families, meeting them in the community to connect with resources and employment. Challenges have again occurred due to vendor capacity.
- ORS continued to fund benefits counselor time for benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
- ORS increased the fees paid for benefits counseling provided to those ORS customers on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee-for-service programming. ORS also entered into an MOU with Work without Limits to enable referrals at time of case closure.

OBJECTIVE 2: Ensure ORS material meets the needs of populations being served and/or outreached to.

- ORS continued to review and modify existing materials and develop new materials as needed in alternative languages, formats, grade levels, etc.
- ORS website is accessible in multiple languages and is ADA compliant. All our materials meet accessibility requirements and the documents we provide allow for software and accessibility features in electronic devices for ease of access.
- ORS Monthly Consumer Satisfaction Surveys are provided in multiple languages and formats.

GOAL 3: IDENTIFY STRATEGIES TO BRIDGE GAPS BETWEEN EMPLOYERS AND INDIVIDUALS:

OBJECTIVE 1: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather current information about business sector needs and state responses.

- ORS continued to have two representatives on Governor's Workforce Board who collect and disseminate information to VR Counselors.
- ORS has presented to Governor's Workforce Board on services that ORS provides.

OBJECTIVE 2: Develop, implement, and replicate the successful business partnerships already operating.

- ORS continues to implement and coordinate Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD. ORS had one adult Project Search site that was lost due to COVID but has identified a new site to take its place. Lost site was a hospital and new site is hospitality/service industry. While ORS has not been able to expand the number of Project Search sites, ORS continues to explore that option. ORS has three transition age Project Search programs, 2 hospital-based programs and one professional office-based program. This past school year ORS had an 88% employment rate over the three transition programs.

- ORS continued to partner with DLT/RealJobsRI initiative to identify new employment opportunities in emerging business sectors for individuals with disabilities. The progress has been slow in this area because the focus has been on Consent Decree demands of the IDD population. Discussions are ongoing.
- ORS BEST has participated in Chamber of Commerce events, job fairs, employer forums, and direct employer contact to assess the needs of the business community.
- ORS has had initial discussions to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR. Strategy has not yet been developed.
- ORS has developed a draft version of an internal tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board. ORS has developed a Teams page for BEST activities including tracking tool.
- ORS was unable to utilize System 7 to create an accurate or useful database for staff to utilize and migration to Informed is pending. ORS will look to new MIS system, to see if tracking employers and employer engagement can be an option.
- ORS identified increased employer penetration via annual report to WIOA/DLT/GWB reporting. Information and Support Services was provided to 25 employers. 26 employers were provided Workforce Recruitment Assistance and 5 employers accessed untapped labor pools.
- ORS reintroduced application, IPE development and competitive integrated employment productivity goals for all VR counselor staff and decided against introducing productivity goals for BEST members only.

GOAL 4: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

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 competitive integrated employment.

- In-School Youth with Disabilities: ORS continued to outreach to 504 Coordinators. ORS presented at the Annual Rhode Island Guidance Counselor Conference to talk about services and referrals. ORS continued to expand services to the many school districts throughout the state.
- ORS continued to work with the Rhode Island Training School as well as having meetings with the Dept of Corrections to offer and coordinate services to those “at risk” youth exiting these programs. ORS has continually reviewed and expanded its traditional Transition services to meet the needs of school districts. This includes middle school students with the goal of introducing Pre-ETS services at an earlier age. This has given students an earlier look at potential career interests and pathways as they enter high school.

- ORS collaborated with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life. The challenge remains vendor capacity in providing customized employment. The Discovery School to Work pilot was completed and has created a best practice in coordinating services for students exiting high school and entering adult services.
- Adults with Disabilities: ORS has worked with the providers to identify obstacles to service delivery including a fee for service rate review and increase to ensure a wide array of service providers and training programs are available. Several new vendors came on board to enable customers from underserved populations to participate in employment services. ORS developed a relationship with LAZO which provides brokerage services for Individuals in the Hispanic community. They provide employment services in addition to several other services that are aimed at helping the individual progress toward their goals and independence.
- ORS continued to review, design, and modify programs and services as changing needs of customers are identified. An example would be changes to driving evaluations and instruction including instructors speaking multiple languages.
- ORS counselors have participated in CHARLA by Lazo for Spanish-speaking families meeting them in the community to connect them with resources and employment. Challenges have again occurred due to vendor capacity.
- ORS continued to fund benefits counselor time for benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
- ORS increased the fees paid for benefits counseling provided to those ORS customers on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming. ORS also entered into an MOU with Work without Limits to enable referrals at time of case closure.

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

- ORS continued to meet with vendors quarterly to monitor quality services. The changes in the fee structure came out of these quarterly reviews. These meetings also identified areas of training needs for CRPs such on topics as Customized Employment, IPS and Braiding of Funds. ORS worked with BHDDH and implemented training opportunities to improve services with an aim on best practice.
- ORS collaborated with BHDDH to conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice. Discussions at these meetings focused on service delivery, changes in services, sequencing funding, etc. These meetings support and facilitate the SE Developmental Disability and SE

Behavioral Health vendors to create opportunities for community of practice, creative problem-solving, information dissemination and training.

- ORS encouraged vendors to provide a full continuum of SE Services including Pre-ETS and worked with providers to explore impediments to service delivery and strategized solutions to overcome obstacles. ORS also reviewed fee structure and increased fees for services for many services to allow for CRPs to have a more stable workforce and fiscal outlook.
- ORS explored Youth Build grants but were unable to take advantage of it as it was not offered in Rhode Island.

OBJECTIVE 3: Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility.

- ORS continued to grow and learn of its development needs and identify gaps in service delivery and cost reimbursement. Between 2021 and 2022 ORS had 2 staff turnovers in the primary position designated to cost reimbursement resulting in program stagnation, onboarding/length of suitability process concerns and full ability of newly hired staff to perform assigned duties.
- ORS met twice with a representative of the J Morrow Ticket Tracker with the second meeting including representation from our ECMS vendor and our IT department. ORS continues to move in the direction of the “Ticket” tracker being aligned and available upon the implementation of the new ECMS, which was not onboarded when initially planned, thus delaying the onboarding of this resource. The “Ticket Tracker” will provide increased ability to monitor cases for possible reimbursement, which is currently being done manually by designated staff.
- The development of Employment Network Partnerships within the State continues to be a challenge. ORS enlisted Maximus the previous ticket EN manager to present to ORS Community Rehabilitation Programs on the benefits of becoming an EN. Unfortunately, despite three presentations between 2021 and 2022 and additional resource notifications, CRPs due to resource concerns, staffing concerns, etc. currently did not feel the return on investment of establishing themselves as an Employment Network was beneficial to them. ORS will continue to assess interest and re-visit this at a future time.
- In 2022 ORS and University of Massachusetts/UMASS Chan Medical School, Work Without Limits developed an MOU to enable client continuum of support/service at time of closure with ORS. Staff were provided a presentation on the benefits of working with WWL and referral process. Additionally, this relationship provides staff and clients access to a monthly “Ticket Tuesday” training topic.
- ORS continues to provide TTW information to staff of the agency on topics such as the TTW program requirements, Work Incentives Planning and Assistance: Introduction to SSD Benefits, Work Incentives and Employment Support Programs with six staff attending, Sherlock Center WIPA program presented to all staff in 2021 and provide ongoing notification to staff of monthly SSI/SSDI Work Incentive presentations for adults and youth, etc. In 2022, ORS developed a Participant Guide – Ticket to Work, clarified language on the

IPE signature form regarding TTW/In-Use status and sends a final closure letter to ensure clients In-use with ORS at time of closure are aware of the “Ticket” being taken out of use and available support options. In 2023 ORS began recognizing staff for employment outcomes meeting Substantial Gainful Employment and case documentation leading to a cost reimbursement with a “Cost Reimbursement Star”.

- While still a consideration, ORS has not moved forward with development of an SSA TTW internal liaison team. Had ORS efforts to establish one or more EN’s within the state this would have been a priority. Also, the SSA TTW and VRC vacancies have presented resource challenges. Additionally, a focus on enhancing re-establishing caseloads, client relationships and vendor relationships post Covid was a primary focus.
- Benefits Counseling continues to be available on a fee-for-service basis via VRC and client agreeing on the service in the IPE and a referral to one of the five ORS approved vendors. Additionally, clients have access to the Sherlock Center WIPA presentations on Work Incentives for those on SSI/SSDI. Individuals, referred to Work Without Limits for ongoing support at time of closure also have access to benefits planning via WWL benefits planning resources.

GOAL 5: 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.

- ORS continued to work with ECMS to track performance measures and RSA standards. As of this date, new ECMS is still in development. ORS will still need to ensure that it encompasses the requirements for WIOA measures and data reporting.
- ORS continued contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state.
- The internal System 7 group continued to educate staff to the required WIOA data elements and established numerical targets that are required importance of timely and accurate documentation. ORS provided one-on-one meetings with VRCs and Data Collection Quality Control Specialist to discuss WIOA documentation and data entry correction.
- ORS is participating in a three-year pilot, funded through the TRT grant with the University of Utah, to measure effectiveness of Pre-ETS services. ORS has developed a draft reporting system which shows the increase/utilization of Pre-ETS services from year to year.
- ORS will continue to explore Technical Assistance opportunities on capturing performance measures as needed.
- Quarterly ORS continued to review RSA911 data and Dashboard data with QI Committee and VR Supervisors. This has led to trainings such as Case Documentation, target case reviews, VRC one-on-one re-orientation to data documentation, etc.

- ORS implemented SE youth tracking in ECMS to distinguish distribution of funds between youth and adults.

OBJECTIVE 2: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations.

- ORS continued to reinforce VR counselors to determine eligibility within 60 days of application and to develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination. Staff continues to struggle with the proper data entry for extensions.
- ORS also had a waitlist for services for several years, instilling caution in counselors from rapidly making their clients eligible.
- ORS Supervisors were not able to access the ECMS/MIS dashboard to view their regional staff to track adherence to these standards on a quarterly basis. ORS Supervisors and Administrator developed individual performance targets for staff to aim for but did not include 60-day and 90-day compliance.

OBJECTIVE 3: Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers.

- ORS reviewed the current regulations and procedures to ensure alignment with current business practices, RSA and WIOA directives, and quality service delivery.
- ORS continued to review WIOA data contained in the RSA-911 and RSA Dashboard at QI meetings and information is relayed to supervisors. Findings have led to staff training on ECF documentation, review of procedures, case review focus areas, one to one staff training, enhanced data entry monitoring for completeness and correctness, etc.
- ORS enlisted support and assistance from SRC with policies, regulations, annual report, consumer satisfaction reports.
- ORS continued monthly customer satisfaction surveys.
- ORS continued quarterly case reviews.

OBJECTIVE 4: Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data.

- ORS staff were provided a self-paced introduction based on role access to the new Case Management/MIS System. Pending the full onboarding of staff will be provided additional training as relevant to their role in the agency and access into the system.
- ORS has purchased Chromebooks and the Career Scope in English and Spanish for the seven regions. VRCs received training in the implementation of the Career Scope and interpretation of the results. Staff will be able to access Virtual Job Shadow platform on these Chromebooks as well. ORS continues to utilize the Virtual Shadow Program, Pathful, with clients to help with job exploration. ORS has also offered the use of the Program to CRPs, and they have been provided with user IDs and passwords to be able to use it with their customers.

- Utilization of the wage interface tool developed with the ECMS vendor to report RI UI wage data enabled ORS to more accurately capture and report WIOA post exit wages. ORS had hoped to explore the ability to do the same with the SWIS wage data, however this remains pending the onboarding of the new case management system InFormed. Access and utilization of The Work Number remains a wage data search tool as well.
- ORS has met twice with a representative of the J Morrow Ticket Tracker with the second meeting including representation from our ECMS vendor and our IT department. ORS continues to move in the direction of the “Ticket” tracker being aligned and available upon the implementation of the new ECMS/InFormed, which was not onboarded when initially planned, thus delaying the onboarding of this resource. The “Ticket Tracker” will provide increased ability to monitor cases for possible reimbursement, which is currently being done manually by designated staff.
- Via a variety of training platforms, all staff have benefited from and continue to be supported and encouraged to engage in relevant training that enhances their skill set in the use of various electronic tools and platforms. This has ranged from basic Word, Excel, and PowerPoint trainings to Career Interest tools such as Career Scope and the new ECMS.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

WIOA Performance Accountability – PY22

Data was obtained from the PY22 Q4 Dashboard provided by RSA in September of 2023 and does not reflect the performance measure outcomes of data applied to the Statistical Adjustment Model.

Employment 2nd quarter Post Exit

Negotiated level = 46.1%

Outcome = 47%

Employment 4th quarter Post Exit

Negotiated level = 45.3%

Outcome = 43.1%

Determining the factors that may have contributed to this performance measure not being met are difficult to assess as the clients are no longer in services with ORS. ORS QI will look to explore further via a review of case closures, outreach to individuals who reflected wages in the 2nd quarter after exit and did not in 4th quarter after exit and if they were closed employed or after plan and provision of services but not employed. ORS QI is looking quarterly at the agency Rehabilitation Rate which may also be a factor in this performance measure and discussing with Supervisors and VRCs.

Median Earnings 2nd quarter after exiting

Negotiated level = \$3,385.00

Outcome = \$3,481.00

Credential Attainment

Negotiated level = 37.5%

Outcome = 33%

Measurable Skill Gains

Negotiated level = 43%

Outcome = 40.3%

Factors that may have contributed to the agencies outcomes not meeting negotiated levels for Credential Attainment and Measurable Skills Gains: Not fully capturing and documenting those individuals utilizing comparable benefits who are in training and/or who are completing education or training that is applicable toward their employment goal. The level of Vocational Rehabilitation Counselor vacancies has resulted in staff covering cases.

Measure 6: Is a State WIOA measure reported by Department of Labor and Training

The State is currently reporting on Retention with the Same Employer 2nd and 4th quarter after exit and Employer Penetration Rate.

ORS ECMS data reflects retention with the same employer for PY22 = 120. This was an increase over PY21 = 74

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

- ORS utilized I & E funds to support and augment the benefits counseling outreach provided by the Sherlock Center on Disabilities WIPA project.
- ORS utilized I & E funds to support the Sherlock Center on Disabilities facilitation of the Developmental Disability and Behavioral Health Supported Employment Council meetings, including joint quarterly meetings to enhance the SE services provided to individuals who require them.
- ORS utilized I& E funds to support the activities of the SRC.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

ORS continues to fund and sponsor ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, core values, and best practice 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. Long term supports are generally available through the funding provided to customers via their involvement with BHDDH and coordinated through BHDDH with the CRPs (both BH and DD providers.)

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities for PY2024 through PY2026 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.

GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES FOR SUPPORTED EMPLOYMENT:

OBJECTIVE 1: In order to increase awareness of ORS's supported employment program, ORS will participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, DD and MH SEC meetings, and Transition events. Information about the availability of supported employment services will be presented in this manner:

- Collaborate with Regional Transition Centers and BHDDH to present on Introduction to State Services to ensure consistent messaging occurs for schools, LEAs, and families on availability and scope of ORS supported employment services.
- Collaborate with Sherlock Center, BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
- Identify the training needs of Supported Employment Providers to enhance skill development.
- Explore technical assistance from VRTAC-QM on how better to market the availability of ORS supported employment services to the public.
- ORS will continue to identify and create vendors and services for the service needs of SE Transition individuals.
- Develop some video presentations regarding supported employment and customized employment, and post on ORS website.
- Present on ORS supported employment services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) and Rhode Island Rehabilitation Association (RIRA) events.
- Collaborate with BHDDH and Sherlock Center to facilitate two Vendor Fairs to increase engagement with businesses and increase awareness of the availability of supported

employment services to employers. First fair to be held virtually in PY 2021 and a follow up face-to-face fair in PY 2022. The fair will be an opportunity for the CRP's who provide SE services, ORS counselors, BHDDH social workers and self-directed individuals to increase awareness of the scope of supported employment services that ORS has available, and for employers, raise the awareness to those CRPs that provide SE services in the areas they are in and what specific services those CRPs and ORS can currently offer.

- ORS will continue to expand SE services to youth prior to exiting high school, as directed in the most recent court actions under the Consent Decree, to secure employment prior to exit and in the process are facilitating an early introduction to adult providers.

OBJECTIVE 2: Utilize participation on Governor's Workforce Board, Workforce Investment Boards, and other advisory groups to help increase awareness of the supported employment services that ORS can provide and utilize the ORS BEST team to gather current information about business sector needs and state responses.

The goal is to increase the awareness of what Supported Employment services are needed and what is available, and to:

- Establish a system to disseminate information to VR Counselors whose focus is on individuals who require SE services.
- Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
- Explore opportunities with all State Partners for collaborative and sequenced funding models for supported employment service delivery via TA from VRTAC-QM.
- Create and implement programs for I/DD youth to participate and gain exposure to career and technical education.

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

- Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD and who need supported employment services.
- Create and implement program for IDD youth to participate and gain exposure to career and technical education.
- Partner with emerging, high wage business sectors and DLT/ RealJobsRI initiative to identify new employment opportunities for individuals with disabilities who need supported employment services.

GOAL 2: INCREASE SERVICES TO UNDERSERVED AND UNSERVED POPULATIONS:

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 competitive integrated employment.

- In-School Youth with Disabilities: enhance and expand the Transition program and service options for students and youth who need supported employment services to coordinate and deliver options for work experiences to youth who will require supported employment services.
- Adults with Disabilities who require supported employment services: ensure a wide array of supported employment service providers and training programs are available to enable individuals who need supported employment services for them 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.

GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:

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

- In-School Youth with Disabilities: enhance and expand the Transition program and awareness of SE service options to coordinate and deliver those services to provide work experiences to youth who require SE services.
- Adults with Disabilities: ensure a wide array of supported employment service providers and training programs are available to enable individuals who need supported employment services 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 competitive integrated employment is the goal from services.

- Identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice.
- Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.
- Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
- Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.

- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
- Identify ways that Virtual Service delivery can optimize services to individuals who are unserved or underserved.
- Encourage CRPs to identify transportation barriers prior to locating employment opportunities to ensure long term job capabilities and retention.
- Provide training and technical assistance via VRTAC-QM on models such as the Integrated Resource Teams (IRT) to enhance wraparound services based on an individual's need and helps to meet their employment goal.

GOAL 4: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE FOR SUPPORTED EMPLOYMENT (SE) AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS.

OBJECTIVE 1: Meet WIOA performance accountability measures for SE.

- Determine the “what and how” of contributing ORS SE data to state reporting requirements and cooperating with State-wide partners of data sharing agreements.
- Continue to educate staff to the new data elements for SE that are required and need to be maintained, be timely, and accurate.
- Continue to participate in Technical Assistance opportunities on capturing performance measures.

OBJECTIVE 2: Provide agency staff with up-to-date tools and technology that enhance delivery of SE services to customers and capture reportable data.

- Provide Staff Training and support as the agency transitions to new Electronic Case Management/MIS System.
- Work with BHDDH and CRPs to track employment outcomes as required by DOJ Consent Decree,

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

Supported employment services for youth occur once the youth has been placed in employment according to the goal on his or her IPE. That may or may not occur while a youth is in school, but most often occurs after the youth exits school. WIOA provides ORS to set aside 50% of the Title VI grant for youth with the most significant disabilities for extended services for a period of up to four years until the youth reaches age 25. ORS anticipates that each population of youth will need different SE services and approaches to ensure that support is available once placed in employment.

Students with disabilities in need of SE Services after job placement will likely need:

- Enhanced Transitioning program and service options within each high school to coordinate and deliver services and work experiences to youth and students with disabilities to reach a competitive integrated employment outcome.
- Develop the capacity and process for providing Job Coach supports for the provision of SE Services including the extended services to youth with disabilities.
- 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 monthly.
- ORS will collaborate with BHDDH and RIDE on a school-to-work pilot that partners with local businesses around supporting and hiring student's/youth with significant disabilities.

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

- Engage Department of Labor and Training (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 that lead to competitive integrated employment and the provision of SE services including the extended services to youth with disabilities.
- Facilitate referrals to Department of Behavioral Health, Developmental Disabilities, and Hospitals (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 monthly.

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 Rhode Island Department of Education (RIDE), BHDDH, Department of Human Services (DHS), and ORS to ensure collaborative funding methods support the provision of SE services as part of Transition and supports to youth with the most significant disabilities.
- 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 programming.
- Explore collaboration with DLT or other entities on any Youth Build Grants when offered.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN

EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two (Behavioral Health (BH) and Developmental Disabilities (DD)) Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to students with disabilities and obligates ORS to set aside 50% of its Title VI funds (when appropriated) for youth with the most significant disabilities.

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. The timeframe for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job, if no long-term provider funding is available through BHDDH or any other sources. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources. These long term supports could and should include natural supports from the employer or others.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS through the BH and DD SE Councils with BHDDH representation, to meet the diverse employment needs of individuals who are significantly disabled 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. ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for customers receiving supported employment services. Again, these supports could and should include natural supports if available.

The State of RI negotiated a 2014 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. BHDDH, RIDE and ORS are working closely on all facets of the Consent Decree to ensure youth and adults with IDD or those identified as covered under the Consent Decree have access to varied SE services and experiences in their interest area and the supports needed for CIE.

CRP development will continue to meet the needs of all ORS adult, out-of-school youth, and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as benefits of becoming a Ticket to Work employment network, Partnership Plus, and Department of Labor and Training/Governor's Workforce Board through identification of new CRPs and enhancing current CRPs.

As a result of the Pandemic, ORS collaborated with the CRP's to immediately address how to ensure services did not lapse. As a result, ORS developed an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services. This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions or disability-related issues. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

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 the Rehabilitation Act amended by WIOA, can fund SE services to 24 months for all individuals and SE services up to 48 months for youth with disabilities age 14 up until the age of 25 with the most significant disabilities if those supports are not available through other means. Natural supports from the employer or others can and should be identified and utilized as available.

The IPE identifies 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 supports are provided solely by the CRP. Again, natural supports from the employer or others can and should be identified and utilized as available.

ORS Transition Counselors assist students and families to identify the CRP that will accept responsibility for providing core support services including extended supports for youth with disabilities aged 14 up until the age of 25 with the most significant disabilities. 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, including referrals to BHDDH and or other natural supports that may be available, as stated above.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER

TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

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 (DOJ/CD), 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 (DD) Council, RI Association of People Supporting Employment First (RIAPSE), 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 their individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support provider/vendor who will continue to provide support to the individual with a disability on a long-term basis. These long-term support providers/vendors are identified in an agreement of understanding, signed by the vendor agency and ORS.

SUPPORTED EMPLOYMENT SERVICE DELIVERY:

ORS has employment services that are available to adults, youth, and students with disabilities 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. The 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. Provider staff resources were therefore unavailable to support integrated competitive employment efforts for adults, youth, and students with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated 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. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems' change.

The three state entities continue to refine and utilize 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. An annual "Introduction to State Services" meeting with each high school, continues to be held.

ORS recently signed a Cooperative Agreement with RIDE, which extended the previous agreement and lays out joint and separate responsibilities of each party. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 20 years. 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 ORS transition services via Pre-ETS and other related transition programming is in place for both students and youth with disabilities and those youth eligible for Supported Employment services that 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 and behavioral health disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental and behavioral health 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 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 paid at or above minimum wage. 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: services will be available for (individuals with the most significant disabilities found eligible for SE services and a limitation of supported employment services up to 24 months, or for up to 48 months of extended services (after supported employment services) for youth until age 25 if no other funding source is available. Natural supports can and should be explored when available.

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 an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. ORS may provide up to four years of extended SE services to youth up to age 25; however, ORS may not provide these extended services to anyone other than youth, and those supports must be provided by CRPs or other sources. In addition, natural supports can and should be explored when available.

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 facilitates a quarterly meeting with all the I/DD Supported Employment CRPs. Those meetings focus on service delivery, increasing hours/week as an expectation of a successful employment goal, and to offer support and guidance to the providers.

ORS took the lead to ensure that staff have the expertise appropriate for the vocational services being provided to individuals with disabilities. ORS has been working with the Sherlock Center for Disabilities, and NCISI 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 for ORS. The Assistant Administrator for Vendor Affairs/Workforce Development and Supported Employment meet at least quarterly with providers/vendors who provide Supported Employment (SE) services to re-enforce the philosophy of Employment First. The two Assistant Administrators, in collaboration with field supervisors, counselors, and ORS administrators, are actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor; the hope is that this will 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 in a DD/BH combined Supported Employment Advisory Council as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities. These meetings are facilitated by Sherlock Center and BHDDH is an active participant.

ORS will continue to encourage CRPs to collaborate with each other, through regular meetings sponsored by either BHDDH or ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual, developmental, and behavioral health issues. This collaboration is also encouraged at 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. The fee for service model continues to be updated and modified to cover needs of the SE customer.

As a result of the Pandemic, ORS collaborated with the CRP's to immediately address how to ensure services did not lapse. As a result, ORS developed an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services. This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions or disability-related issues. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	811	811	\$704,674.47	N/A
2	406	406	\$787,995.39	N/A
3	45	45	\$84,512.70	N/A
The total projected number of VR eligible individuals to receive services in FFY 2024 are 1,262.				

B. SUPPORTED EMPLOYMENT PROGRAM.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	518	518	\$1,835,301.98	N/A
In FFY 2024, the projected number of Title VI to be served under an IPE is 518.				

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

From late 2018 through FFY 2021 ORS continued an Order of Selection with all categories closed due to upcoming retirements, vacancies, budget constraints, promotions, sick leaves, and workforce reductions. From July 2020 (when Category I was opened,) ORS subsequently opened Category II on 2/1/21 and category III opened on 6/1/21. Throughout FFY 2025 through FFY 2027, ORS anticipates continuing to service consumers in Categories I, II, and III. While ORS does not currently have a Category I, Category II, or Category III Wait List, and all categories are currently open, ORS will still operate under an Order of Selection for FFY 2024-FFY 2027. ORS will reserve the ability to close categories if funding levels or staffing levels change, or ORS sees a dramatic uptick in applications post-pandemic. 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.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

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, whether a mental or physical impairment, that seriously limits four 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 more functional limitations 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, whether a mental or physical impairment, that seriously limits one functional capacity in terms of an employment outcome and requires one or more services over an extended period of time.

Extended period of time: Six months or more.

Multiple services: Requiring two or more primary services.

ORS opened Category I on 7/1/20 and opened Category II on 2/1/21, and on 6/1/21, Category 3 was opened. While ORS does not currently have a Category I, Category II, or Category III Wait List, and all categories are currently open, ORS will still operate under an Order of Selection for FFY 2024- FFY 2027. ORS will reserve the ability to close categories if funding levels or staffing levels change following public notification, or ORS sees a dramatic uptick in applications post-pandemic.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

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 – 24 months

Priority Category II – 12 months

Priority Category III – 12 months

Maintain Employment Clients- 6 months

Projections for numbers to be served in FFY 2024 through FFY 2027 are based on the current census. These numbers reflect those currently being served or projected to be served.

Order of Selection (OOS):

FFY 2024 - OOS Category I: 811

FFY 2024 - OOS Category II: 406

FFY 2024 Title VI to be served: 518

FFY 2025 Title VI to be served: 519

Successful Closures:

FFY 2022 Successful Closures: 265

FFY 2023 Successful Closures: 328

FFY 2024 Successful Closures: 329

The goal for all the customers referenced by the Order of Selection categories is a competitive integrated 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.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VRC1	17	24	27
VRC2	18	18	24
Supervisory	8	9	10
Administrative	8	8	8
Fiscal	6	6	9
Support Staff	11	11	15
Social Services	7	7	10
Direct Services	4	5	7

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

1. Ratio of qualified VR counselors to clients: 1: 77.6

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

Projected number of individuals to be served in 5 years:

FFY 2024: 2,716

FFY 2025: 2,717

FFY 2026: 2,718

FFY 2027: 2,719

FFY 2028: 2,720

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Assumption University	Master's in Rehabilitation Counseling	22 full-time enrolled; 1 CAGS	8 Graduates (2 graduated with CAGS)
Salve University	Master's in Rehabilitation Counseling	2 in full-time program; 0 in accelerated program	0
UMASS Boston	Master's in Rehabilitation Counseling	43	14 (13 with MS in Rehab Counseling; 1 with certificate)

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED

PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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, Salve Regina University and UMass Boston to ensure that the present and projected needs of ORS are considered in the program planning. All offer a MA, or MS in Rehabilitation Counseling via a combination of on-campus and distance learning.
- ORS VR Administrator and Supervisors work with the schools to provide opportunities for students to meet with ORS to learn about Vocational Rehabilitation Services in the State VR agency, to promote the opportunity of paid practicum and internship opportunities, and the application process for posted positions as available.
- Additionally, ORS maintains a recruitment list and sends position posting and internship opportunities to education institutions in the Northeast and interested individuals.
- ORS VR Administrator and regional VR Supervisors meet annually in the Spring with VR students, recent alumni, and staff of Salve Regina University, Assumption College, and UMASS Boston to inform graduates of upcoming positions to be posted as well as educating attendees on the benefits of working for a State VR agency.
- Additionally, ORS will continue throughout the year to send reminders of internship availability and position openings. Supervisors and VRCs reach out to, present at, and attend career days at local educational institutions who offer related human services degrees on the benefits of a career path, internships via the State of RI Internship Program, etc. in Human Services/Vocational Rehabilitation and working for a VR agency. Despite an ongoing recruitment effort by ORS, many of the students in these programs attend classes virtually and reside scattered throughout the country, which lowers the number of candidates for internships and employment opportunities.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

- i. 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

i. ORS staff have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL). The ATAP program director and partners provide training and updates to staff on the changing technology. Staff are notified of training opportunities.

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

ii. ORS will continue to utilize the Technical Assistance Center(s) (VRTAC-QM) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocational Rehabilitation services.

ORS has enlisted the VRTAC-QM to assist in addressing the following WIOA requirements: (1) Effective Implementation of Pre-ETS; (2) Effective transition to the common performance outcome measures; (3) Internal Controls, and (4) Develop partnerships to better meet business engagement and employer supports.

ORS will continue to distribute articles, information, and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions. All staff utilize the internal ORS Rehab Counselor email for distribution and sharing of resources.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY 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

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.

A. Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. 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. Due to the lack of qualified candidates for vacancies, ORS continues to explore multiple ways to restructure the Rehabilitation Counselor position while maintaining the Master's Degree Requirement. If any methodology is developed that might allow for recruitment efforts who might have a Master's Degree in a related field, ORS will work with the SRC and State Personnel to bring that change forward,

- ORS is also exploring other options up to changing the VR Counselor position through the State HR system to better align with other State VR agencies who have determined that the

Master's Degree requirement has been the ultimate obstacle that has stymied their hiring efforts.

- Those States have lowered their minimum standard to requiring a Bachelor's in a related field. ORS will be considering that as an additional option as recruitment efforts continue to fail and ORS vacancies continue to increase (due to retirement, other agency recruitment efforts, or from promotional opportunities within ORS) and the Universities that do offer Rehabilitation Counseling report lower admissions for that Degree. It appears that those numbers will not suffice to replace current and future vacancies.
- 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, but lack of candidates raises concerns about being able to continue to meet this standard.
- ORS will continue to offer paid practicum/internship opportunities for students in MA Rehabilitation Counseling programs and will continue to work with institutions of higher education to recruit qualified individuals to fill vacancies.
- ORS will also continue to accept interns through the State Internship program which affords high school and college level individuals an opportunity to work in and experience the VR Program.
- ORS will continue to reach out to local colleges with Human Services programs and attend career days, to promote a career as a Rehabilitation Counselor. 1. ORS discusses how a Rehabilitation counselor could be part of a career path for individuals in the Human Services field.
- ORS is hiring 5 Rehabilitation Technicians that will act as case aides to assist Rehabilitation Counselors until additional Master's Level staff can be hired, or other options are developed.
- ORS will continue to fill all fiscal, support staff and case aide vacancies with individuals who meet state requirements for education and experience.
- ORS will continue encourage and support staff seeking a CRCC by paying for the exam preparation class. The agency will continue to seek Commission on Rehabilitation Counselor Certification (CRCC) credits approval for training provided by ORS. Also, ORS has established the ability for all staff to access training via the CRCC E-University. Currently ORS has 26 VR Counselors, Supervisors, and Administrators who are CRC certified.

B. ORS supports and encourages staff training and professional development and maintains a procedural process for individual staff request. Additionally, ORS provides each staff with a monetary amount for their use in attending individual and/or professional development trainings that they and/or their supervisor see as professional development and skill enhancement. ORS conducts a by-annual Comprehensive Staff Training Needs Assessment with the most recent one being completed in May of 2023. The survey focused on staff training needs, professional development needs and training that would benefit both ORS and vendors. The results of this assessment assist in ORS with the prioritization of training needs as an agency and/or individually.

- The agency also sees training as a dynamic process and introduces training topics on an ongoing basis based on data trends, changing needs of or the clients served, etc.
- Staff indicated the following topics as the top ten (10) training needs: Mental Health Diagnosis, Causes, and Supports; Social and Emotional Needs, Understanding Cognitive & Psychological Assessments; Hands on Training for InFormed/ECMS; Core VRC Skills, Assessment, Job Analysis, Interviewing Skills, Client Engagement and Communication; Business Engagement/Job Development for Job Ready Clients; Using Outlook, Word, Excel, Photo Shop, etc.; Gender Inclusivity, LGBTQ+ Issues in the Workplace and Employers; VR Regulations and Procedures, Sharing Information with Disability Rights Rhode Island; Transition; Disability Specific Trainings; Documentation Uniformity in Electronic Case File, Professional Writing.
- How ORS might assist staff with Professional Development reflected the following: Continue to provide trainings, monetary and time support to attend trainings; Provide opportunities for cross departmental job shadowing/exploration of duties and informational, meetings with experienced staff i.e., Pre-ETS and Supported Employment; Continue to maintain CRCC credit availability, offer trainings as varying times, recoded trainings with CRCC credits. Through supervision and opportunities to check in with other staff.
- ORS staff indicated the following as training that would benefit both ORS and Vendors of ORS; Employer Outreach, Business Engagement, and Worksite Development and Placement Skills with Creative Strategies and Accommodations in the Workplace; How to Improve Collaboration and Communication; Effective Partnership/Teamwork between Counselors, Vendors and Clients; Gender Inclusive Training, LGBTQ+; How to Properly Fill out Reporting Forms; Report Writing/Goal of Referrals and Assessments, How to Work with Difficult Clients and Various Populations.
- ORS utilizes a variety of trainers and TA providers to assist with providing a diverse and comprehensive training agenda with included required trainings, quarterly VR Meeting trainings and independent professional development. Examples include training provided by Disability Rights Rhode Island/CAP included: Employment Rights/ADA which was also co-presented with Governors Commission on Disabilities; Guardianship which also included CRPs, and a Refresher on CAP and DDRI. Center for Staff Development and Learning/Department of Human Services; Annual HIPPA, Confidentiality and FTI, Multicultural Competency Trainings Series Advanced Anti-Oppression in the Workplace, Understanding Social Identity, Power and Privilege in the Workplace, Disrupting Implicit Bias with Inclusive Behaviors in the Workplace and Combating Microaggressions with Inclusive Language in the Workplace.; Safety and Security Training(s), Domestic Violence. IT required trainings throughout the year. Staff utilized the CRCC E University; Ethical Issues When Working with Offender People, Evidence Based Practices & Rehabilitation Counseling Case Management, Benefits of Employer Provided Accommodations & Role of VRC, Developing a Labor Market Survey, etc. Cross Department Trainings included SNAP & ET Overview, ORS Services on VR, SBVI and DDS to DHS staff,

OSCIL and ORS cross training on services. Workforce American Job Center Partners Cross Training. RI Learning Center training included Microsoft Quick Start, Intentional Inclusion, and Thriving in a Multigenerational Work Environment, Inclusive Leadership: Leading a Diverse Team and Effective Communication. SVR training included Ethics: Gender informed VRC, Contemporary Approaches to VR, Innovative Job Placements, How Rehab Bus. & Professionals can Help Employers Strengthen Their Accommodation Process, Employment Supports for People with Serious Mental Illness.

- Work Incentives Planning and Assistance: Introduction, SSA Cost Reimbursement 101, Emerging Leadership Training, Case Documentation, Introductions to the pending ECMS included Academy Modules, Fiscal Interface, Wage and TTW Interface, VRC Walkthrough Demo, Support Staff Demo, etc. Enhanced Financial Management Training to Assist with Accurately Completing Financial Reports and RSA Updates/Reports, ASL Classes, Tilting at Windmills, UMASS Work Without Limits EN Services. Integrated Resource Team, Tarasoff and Duty to Report.
- ORS continues to seek out guidance and expertise of the various technical assistant entities such as VRTAC. These resources have been and will continue to be important in assisting ORS with maintaining knowledge and expertise as the provision of vocational rehabilitation services, employer engagement and outcomes continues to evolve. Additionally, with ongoing staff transition within the VR program and agency, ORS has utilized these resources to assist with Emerging Leadership Development, Non-Delegable Responsibilities & Organizational Structure Update, Improving Retention of State VRCs, Rapid Engagement, Integrated Resource Team, VR Grants Management Training Certificate Program, Credential Attainment, Hispanic Individual's with Disability Building Business Partnerships, etc.
- ORS provided combined trainings for Vendors and VR staff examples include Guardianship by DDRI, Supported Employment Braiding & Sequencing of Funds for BHDDH funded Providers and What does it Take to Become a Benefits Counselor.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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. The Electronic Case Management System allows for entry of individual's primary language and preferred communication. It is also Jaws compatible for ORS staff who require that program to maximize functionality.
- ORS utilizes Purple VRI an AT communication device to provide for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.

- The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software, and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies. Additionally, ORS developed guidance for staff in the use of Closed Captioning for Virtual Platforms such as Zoom and Microsoft Office Teams.
- The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and who serve as a resource for staff development and training in addition to their direct service responsibilities.
- The staff of ORS have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL). The ATAP Program Director and partners provide training and updates to staff on the changing technology.
- The State of Rhode Island has secured the following interpreter services which enable access to ORS information and services: PinPoint, Interpreter Service Video Remote Interpreter and Language Line - The Big Word. Additionally, ORS utilizes vendor interpreters from a variety of resources and bilingual staff.
- ORS brochures, letters, and forms are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

5. 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 Statewide 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. BHDDH staff have also participated in this annual event over the past few years.
- 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 VR Assistant Administrator for Transition and/or VR Administrator 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. VR counselors with Transition responsibilities also attend the monthly Transition Advisory Meetings conducted by the Regional Transition Coordinators, which is an opportunity for updates on recent changes and cross training in specific areas between special educators, teachers, and ORS.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

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. An updated MOU has been completed and signed with the Rehabilitation Services Administration, advisory to ensure that the new MOU meets the federal standards, and RIDE and ORS agreed to amend the new MOU to reflect those advisories.

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 twenty 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 and coordinate an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services and consultation in addition to WIOA Pre-Employment Transition Services (Pre-ETS.)

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 and sharing 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 Local Education Authority (LEA), with parental/guardian 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-ETS and includes the process for informed choice for student/family to register just for Pre-ETS services or apply for the full array of VR services. Under the auspices of the Cooperative Agreement, ORS can assist in-school youth with disabilities in collaboration with each LEA. These transition services and pre-employment transition services fall under the requirements outlined in the 2014 Workforce Innovation and Opportunities Act (WIOA) to prepare students for employment after high school. Counselors meet with potentially eligible students with disabilities and their parents/guardians to give them informed choice options as described above. Office of Rehabilitation Services strives and is committed 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-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 (Status 10), and updated as appropriate, and again prior to graduation. While ORS does not currently have a Category 1, Category 2, or Category 3 Wait List, and all categories are currently open, ORS will still operate under an Order of Selection for FFY 2024 - FFY 2027. ORS will reserve the ability to close categories if funding levels or staffing levels change, or ORS sees a dramatic uptick in applications post-pandemic.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for students with disabilities is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-ETS provided to students with disabilities includes the five required services, as well as additional services under an IPE which include: Counseling and Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training. Over the past couple of years ORS has piloted and now fully implemented multiple services which include our Middle School career awareness program, a 9th and 10th grade Work Readiness Program; Career Chats where students connect with businesses and hear/learn about the requirements and details of specific career paths; an interviewing-skills workshop; and a collaboration with The University of RI's S.T.A.R.T. URI, a transition program working with students with Autism/Asperger's. For the 23-24 school year ORS is looking to expand Pre-ETS to include a Career and Technical Education (CTE) collaborations with school districts, giving students an opportunity to gain knowledge and skill around specific career paths.

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 exit from public education. Therefore, ORS services incorporate a review of the Career Development Plan (CDP) 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 Transition team to achieve the two 60-day Trial Work Experiences mandate of the DOJ/State Consent Decree.

In December 2022 there were eight transition court actions which became part of the consent decree. These court actions center around moving students with I/DD from work trial to full employment prior to exit from high school. In collaboration with RIDE and BHDDH, ORS has developed a multi-tiered approach to support and collaborate with school district to meet mutual CD goals.

The student and his/her family's involvement with ORS will support the student's 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. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services.

RIDE has contracts with the Regional Transition Centers to support transition, planning, and disseminate information about adult services within each high school. Each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Transition Coordinator (RTC), and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. ORS Counselors provide and share information regarding adult services; typically, the ORS Counselor at each high school provides specific information regarding ORS services. The RTC supports the sharing and dissemination of ORS information. This "Introduction to State Services" is to inform school staff about services and eligibility for programs and includes employment/supported employment programming that may be available, as well as services from the State's Department of Developmental Disabilities as appropriate. 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 Committee (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 Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, CDPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act.

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, discuss Pre-ETS, Order of Selection, and accept referrals.

ORS may provide transition or pre-employment transition services to eligible or potentially eligible students with disabilities. ORS will provide all five of the required Pre-ETS services and other services which may include, as appropriate, counseling and guidance, job exploration and assessments, work readiness workshops, Community Based Work Experience, Tri Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training; however only the five required pre-employment transition services may be provided to potentially eligible students with disabilities. All other services may be provided to eligible students with disabilities under an IPE. 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 or those who may be eligible for adult services (many youths who qualify for DD do not have a primary disability of I/DD, i.e., Autism, Cerebral Palsy, etc.) 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 two 60-day trial work experiences prior to graduation. Therefore, ORS services incorporate 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 two 60-day Trial Work Experience mandate of the DOJ/State Consent Decree. As mentioned previously, as of December 2022 each student under the CD and on a CDP will be expected to leave high school with paid employment. ORS will work collaboratively with school districts by continuing to provide all the valuable assessments, and exploratory employment services and as students develop their employment interest and skills ORS in partnership with schools and CRP's can develop employment sites and supports to be successful in the community.

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

ROLES AND RESPONSIBILITIES OF ORS AND RIDE:

A. FINANCIAL:

RIDE and LEAs will be responsible for transition services mandated by Federal and State laws and regulations. DHS/ORS will be responsible for Transition and Pre-Employment Transition services (PRE-ETS) consistent with the Rehabilitation Act, as Amended by WIOA 2014. RIDE will be responsible for ensuring that a free and appropriate education (FAPE) is made available to eligible students, including special education services included in the individualized education program (IEP), as authorized by the IDEA.

Pursuant to 34 C.F.R. §300.154(b)(3)(i), nothing in this part will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities within the State involved.

Section 113(a)(b) of the Rehabilitation Act, as well as final §361.48(a)(2), requires ORS, in collaboration with the RIDE, to ensure that the required five PRE-ETS services are made available statewide to all students with disabilities in need of such services. RIDE will support ORS's collaboration with Local Education Authorities (LEA) in providing or arranging for the five required PRE-ETS described in this agreement to students with documented disabilities (students 14 years of age through their exit from high school) as defined under §361.5(c)(51), based on individual need once a student requests or is recommended for one or more of the PRE-ETS services. Any PRE-ETS service that ORS provides will be available to students identified by the school of record or to a student known as a person with a disability by the VR counselor. ORS will continue to offer a series of Pre-ETS introductory services to middle school youth ages 14 and above, to better prepare students with disabilities about employment.

B. JOINT RESPONSIBILITIES:

Both RIDE and ORS/DHS are the lead agencies in executing the Cooperative Agreement (CA) as follows:

- All personnel assigned to responsibilities described in this agreement will comply with the certification requirements of the respective lead agencies.
- RIDE and DHS/ORS will utilize the RI Transition Council and the State Rehabilitation Counsel as a venue for developing transition-related policies in the respective agencies.
- RIDE and DHS/ORS will follow their own agency's policies for the review and development of policies including the review of the Special Education Advisory Committee.
- RIDE and DHS/ORS will notify each other when new policies are in development or of policies that are being revised, to encourage collaboration in policy development related to transition. • As new federal or state requirements or initiatives are identified, YR and RIDE will provide joint training to school personnel and YR staff whenever possible.
- ORS and RIDE will address issues and concerns related to coordination and implementation of PRE-ETS and transition services in schools.
- If roles and responsibilities for the provision of PRE-ETS and transition services are unclear, ORS will contact the appropriate RIDE IDEA staff to clarify the roles and responsibilities of each entity.

- RIDE will support ORS staff in efforts to assist LEAs on issues and concerns related to coordination and implementation of pre-employment transition services and transition services.
- Section 511 of the Rehabilitation Act requires that anyone age 24 or younger may not start at subminimum wage unless it is documented that the person received pre-employment transition services or transition services under the Individuals with Disabilities Education Act (IDEA). and/or applied for ORS services and was unable to be successfully employed in an integrated competitive employment setting. For the purposes of a 2013 Consent Decree between the DOJ and state of RI, RIDE supports ORS in promoting Supported Employment Services where the individual is compensated at or above minimum wage in an integrated employment setting.
- Inform staff, students, legal guardians, and parents of the mandates found in the 2013 Consent Decree between the DOJ and the state of Rhode Island which have requirements about integrated work experiences and competitive employment as expectations of Rhode Island as an Employment First state.

C. DHS/ORS RESPONSIBILITIES:

The DHS/ORS Associate Director or his/her designee will assign a Vocational Rehabilitation Counselor to each comprehensive high school in the state. The list of assigned Vocational Rehabilitation Counselor will be included in RIDE and DHS/ORS promotional materials.

- Assigned Vocational Rehabilitation Counselors will maintain a schedule of availability in each assigned school and convey this schedule to appropriate local education agency personnel.
- DHS/ORS is responsible for the implementation and compliance of Title IV of the Rehabilitation Act as amended by WIOA and all related Rhode Island laws and regulations.
- DHS/ORS will request LEAs, through the high school department chair or designee, to make every effort to schedule Individual Education Program (IEP) meetings during the scheduled hours of the Vocational Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about Vocational Rehabilitation Services available for the IEP. Assigned Rehabilitation Counselors will make every attempt to attend IEP meetings for DHS/ORS eligible students expecting to graduate in two years or less.
- Rehabilitation Counselors will make efforts to attend meetings and events at assigned schools to share information about Vocational Rehabilitation including PRE-ETS, adult services, transition services, materials and the Order of Selection with students, parents, special education staff and school personnel. Rehabilitation Counselors will provide brochures and materials about the VR process and services to the school districts for distribution to students, parents, legal guardians, teachers, and others.
- Students with disabilities, including those who have not yet applied for or been determined eligible for VR services will be informed by ORS of their ability to participate and receive the PRE-ETS services they may need. These services will be described and included in the IEP as appropriate, along with the identified Transition services.

- ORS will plan for statewide implementation of PRE-ETS and transition services in keeping with this Agreement, policies, procedures, and guidelines.
- ORS will accept referral of students with disabilities during the transition planning process for the provision of PRE-ETS and Transition services.
- ORS will provide consultation with and training to school district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP/504 process and provision of pre-employment transition services.
- Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.
- Develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student-client's Individualized Education Plan (IEP), within 90 days of VR eligibility determination, unless an extension is approved.
- Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs.
- Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).
- Provide information to parents and/or guardian(s), student/clients regarding VR eligibility, Order of Selection, vocational assessment for employment and postsecondary planning and Client Assistance Program (CAP).
- Obtain written consent for the release of confidential information, pursuant to ORS policy and procedures, federal and state laws, and regulations regarding confidentiality.
- Share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to, and availability of, PRE-ETS and Transition services.
- Promote employer participation in providing opportunities for work-based learning for students with disabilities.
- DHS/ORS will assist with identification of students with disabilities for PRE-ETS and Transition services and who may be eligible for services.
- DHS/ORS will ensure applications are widely available to students with disabilities and their families; describe the referral process, application procedures, as well as timelines for each; provide informational literature; and explain eligibility requirements and the eligibility determination timeline. When an application is submitted, ORS will make an eligibility determination within 60 days unless exceptional and unforeseen circumstances beyond ORS's control preclude making an eligibility determination within 60 days and ORS and the students with disabilities agree to a specific extension of time.

- DHS/ORS will maintain an active presence and receive referrals of students with disabilities for pre-employment transition services as well as potential ORS applicants at: parent support groups, parent forums hosted by high schools, transition and career fairs, programs providing independent living skills training, organizations serving youth who are blind, partially sighted, deaf, hard of hearing or deaf-blind.
- Referral for ORS services can occur at any time during the school year and will be processed immediately upon receipt. ORS will communicate by phone, mail, or email with the referred students with disabilities and parents, as needed and appropriate, to submit an application and/or schedule an intake appointment.

D. RIDE AND LOCAL EDUCATION AGENCY (LEA) RESPONSIBILITIES:

- High school department chair or designee will strive to schedule Individual Education Program (IEP) meetings during scheduled hours of the Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about ORS for the IEP meeting.
- The development, scheduling and coordination of the IEP meeting.
- Mechanisms to monitor the implementation of this section of the CA will be included in the RIDE School Support Monitoring process.
- RIDE and LEAs will support ORS in the dissemination and implementation of pre-employment transition services information and programming.
- RIDE will assign the State Transition Coordinator. This CA does not reduce the obligation under IDEA of a local education authority or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities within the state.

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals.

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. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection, and provide informed choice options, including whether to register for Pre-ETS services or apply for VR services. 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. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

E. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

F. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

1. **VR Services**

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer customers paid, community-based, integrated work experiences consistent with customer interests. This service provides a unique opportunity for ORS to assess an individuals' work skills and behaviors within a "real" business environment. The employer provides feedback to the agency and the customer about the individual's 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 coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities. ORS has collaborated with DLT on efforts to maximize DLT's Work Immersion program (offering up to 12 weeks of paid employment in a community-based work setting) and OJT program to ensure that collaborative funding takes place between customers of both agencies. Additionally, ORS is exploring other possible Adult Project Search sites to be developed and implemented, as the RI Hospital site was discontinued post-COVID-19. This was an effort that utilized collaborative funding between ORS, DLT/RealJobsRI, and BHDDH.

The Workforce Development Assistant Administrator and the agency's Business Engagement Specialist Team (BEST) has developed over 30 business partners with a myriad of companies in Rhode Island. Each partnership has a liaison, or one point of contact assigned to that business. The liaison not only works with that business assisting with their workforce needs but also is available for disability awareness training, tax incentive information and information regarding assistive technology or accommodations. When provided with job openings from these partners, the liaison will then share that information with the BEST Team who then review the information with their respective regions so that qualified candidates can be identified. Once a qualified job seeker has applied and after a confidential release has been obtained, an ORS BEST representative contacts

the employer and job develops on the qualified job seeker's behalf. ORS is exploring different business engagement models with VRTAC-QM as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts. The Workforce Development Assistant Administrator also receives daily job postings from the Department of Labor and Training, JOBfindah Network, VOCcentral and NET (National Employment Team).

The COVID pandemic significantly affected employment services across the board, especially job development and placement and most in person or community-based programming. As a result of the Pandemic ORS developed an array of Virtual Services to ensure that individuals would continue to receive vocational services. The array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals. ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face employment services were not available. These Virtual Services were developed across SE, Non-SE and Pre-ETS fee for service programming. ORS has also recently added new vendors who offer virtual short term non degree trainings, including a number of Computer and IT trainings. This new service has opened employment opportunities for customers who otherwise would not have been able to attend a training in person.

In the post-COVID economy, ORS will continue work with employers and CRPs to develop a coordinated effort to ensure that employers get the qualified candidates for their vacancies, and customers are provided more opportunities for jobs out in the community. The BEST team will work with other VR staff to consult on cases, discuss job openings and make connections as appropriate to employers. ORS will further coordinate with DLT on sharing leads that ORS cannot fill to ensure that employers needs are optimally met. ORS has also scheduled an Employer Forum for June 19, 2023. ORS has reached out to all their employer contacts and have requested that the community providers do the same. The Forum will consist of presenters, regarding Windmill training, Workplace AccessAbility Grant and APSE. Employers will also have the opportunity to separate into small groups and discuss how ORS can assist the employers with their workforce needs, disability awareness and other disability related information and training. ORS is holding this forum at least twice per year.

COMPREHENSIVE NEEDS ASSESSMENT:

ORS conducted a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2021. This CNA incorporated a component related to the needs of the business community to bridge gaps between employers and individuals and to create a foundation for developing new and innovative training and services specific to help individuals to remove personal and other barriers they face to obtain and maintain competitive, integrated employment. The findings are being incorporated into State Plan goals and strategies.

MARKETING/OUTREACH STRATEGY:

ORS will continue collaboration with its state partners and the SRC to explore development of a marketing plan to target specific business sectors. This will help the continuation of strategies to promote better awareness of ORS and its scope of services. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of

Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is critical as the state implements 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 healthcare and business sectors. The State emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search – started in 2014, was a success, and the program was replicated with Blue Cross Blue Shield in 2015, and an additional site in 2016 at Newport Hospital.

In addition, ORS has funded summer work experiences for youth since 2010. We have added College Summer Work experiences which connects employers with students who have gained career specific skills through college or post-secondary school. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community-based work settings paid at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can also report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,272 identified Pre-ETS individuals.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES))
CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. 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 performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance.

ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP's strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living

potential. Device loan allows an individual to trial a piece of technology to increase their skills or bridge a gap in services. The goal is to provide quality assistive technology access and allow individuals to make an informed choice.

In conjunction with ORS', ATAP in-house staff and ATAP Partners provides training to ORS Vocational Rehabilitation Counselors and ORS Vocational Fee for Service Vendors about assistive technology and the services of the program to better support the individuals we support.

Every Fall ATAP Partners also participate in TechACCESS of Rhode Island's Assistive Technology Conference of New England. In the Spring, ATAP partners participate in an Assistive Technology Awareness Day, providing assistance, information, and demonstration. ORS' ATAP in-house staff and ATAP partners continue to increase their knowledge of assistive technology that is constantly changing, and the paradigm shifts that go with it to provide expert supports to individuals working with ORS to achieve their vocational goals.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

ORS does not have such cooperative agreements at this time.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

ORS has cultivated a strong working relationship with numerous agencies that support out of school youth. The RI Ocean State Center for Independent Living (OSCIL) offers services to augment vocational rehabilitation services. OSCIL can provide support services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. ORS also participates with the DLT in reviewing their requests for proposals for programs. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS has been a participant, though the subcommittees have not met this year. ORS has begun expansion with the two Governor's Workforce Boards and RealJobsRI to explore how best to expand Pre-Employment Transition services to students with disabilities.

4. STATE USE CONTRACTING PROGRAMS;

The Vocational Rehabilitation program relies 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). ORS does not participate in State use contracting programs.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

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 (DHS). 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 to identify obstacles, increase inter- and intra-agency collaboration, and develop possible solutions.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive benefits planning information through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Rights Rhode Island, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid. ORS has collaborated with the Sherlock Center on Disabilities (RI's University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD) program) to ensure that community forums are set up to disseminate benefits counseling information to families, individuals, stakeholders, and transition aged youth as the first step in increasing knowledge of work incentives. For the past several years, ORS has paid for the benefits counselors' time in these public forums to ensure more WIPA funds are available for 1:1 benefits counseling. ORS has collaborated with the Sherlock Center, which currently holds the WIPA grant, to increase the overall number of benefit counselors available in the state since available Benefits Counselors are declining due to attrition.

6. 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 competitive integrated employment opportunities.

ORS sponsors and participates in the Developmental Disabilities Supported Employment Council and Behavioral Health Supported Employment Council and has a representative on the Developmental Disabilities Council. ORS also has representation on the board of the RI Chapter of the Association of Professionals Supporting Employment First (RIAPSE.)

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 competitive integrated employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. 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 via ORS funded trainings, presentations, technical assistance and mentoring by liaison staff from ORS.

As the funding source, ORS holds a quarterly meeting with all the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support. ORS and BHDDH have also enlisted technical assistance providers to explore collaborative “sequenced” funding to maximize SE dollars. ORS and BHDDH have provided annual training to the CRPs about Braiding and Sequencing of available funds. ORS has increased the fee-for-service rates in all its service fees to pay Vendors a rate that is more commensurate with the national vocational rehabilitation rates.

In 2014, the State of RI 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 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. These obligations have been developed and are in place currently, with quarterly reporting to the DOJ and Court Monitor on data, process, and continuous quality improvement.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

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 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 competitive integrated employment outcomes. Supported employment services are available after job placement. 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. Natural supports from an employer or others can and should be identified and utilized as available.

For the past two years, ORS has collaborated with the BHDDH to work towards increasing the utilization of ORS and Medicaid funding for employment services. ORS and BH jointly met with the local Mental Health Agencies to consult and discuss potential referrals and services. ORS and BH have jointly participated in Individual Placement and Support (IPS) Training and are consulting with agencies who also utilize that model for Competitive Integrated Employment.

The objective of the SE services is in competitive integrated employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. 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, the Rehabilitation Act provides for 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 an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job if no other funding source for the long-term supports is identified. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25 after the transition to extended services; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources. Natural supports from an employer or others can and should be identified and utilized as available.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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, state agencies, federal agencies, community employers, 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), Mashantucket Pequot Tribal Nation, Workforce Partnership of Greater Rhode Island, Cranston/Providence Workforce Development, and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) has been completed and signed with RSA advisory to ensure that the new MOU be revised to meet the federal standards.

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 the State's independent living center to augment the services provided by ORS. Rhode Island has one IL center that provides support

services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school, and in-school youth.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

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 community rehabilitation providers (CRPs) 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 and Control, the federal System for Award Management (SAM) website, and the Secretary of State 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, and/or client feedback. ORS also reviews the Department of Labor and Training's ETPL (Eligibility Training Provider List) annually to ensure DLT's and ORS's training fees are consistent. Based on these findings, in addition to the results of the core partner strategic planning sessions, 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 baseline credentialing criteria to provide Job Coaching and Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

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, 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 VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must include
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 State 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:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.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.
3.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).
3.e. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.

The State Plan must include
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.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.
3.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 as set forth in section 101(a)(18)(A).
3.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:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.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.
4.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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.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
4.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.
4.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 sections 101(a)(14) and 511 of the Rehabilitation Act.

The State Plan must include
4.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.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.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
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.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.
5.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.
6. Financial Administration of the Supported Employment Program (Title VI):
6.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)(H) and (I) of the Rehabilitation Act.
6.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

The State Plan must include
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:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Office of Rehabilitation Services

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). 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 OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

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

[3] No funds under title I 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.

[4] 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 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Rhode Island Department of Human Services

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, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], 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;

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

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) 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;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Joseph F. Murphy

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO
SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE
SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Associate Director

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.

FOOTNOTES

[1] Public Law 113-128.

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

[3] No funds under title I 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.

[4] 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 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

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

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported
Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

**To review and complete the Certification section of the VR portion of the State plan, please
select the "Edit" button.**

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can
copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Joseph Murphy
Title of Signatory	Associate Director
Date Signed	January 5, 2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	48.6		49.6	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	45.1		46.1	
Median Earnings (Second Quarter After Exit)	3,549.00		3,645.00	
Credential Attainment Rate	33.7		34.8	
Measurable Skill Gains	40.5		42.0	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

A Division of the Rhode Island Department of Human Services, the Rhode Island Office of Rehabilitation Services Vocational Rehabilitation (VR) Program is the public state and federally funded program that assists individuals with disabilities to choose, prepare for, obtain, and maintain employment. Employment being the successful outcome of services provided through the public vocational rehabilitation program. It is expected that individuals with disabilities who apply for services are interested in becoming employed and understand that this is the focus of the VR program.

Our mission is to empower individuals with disabilities to choose, prepare for, obtain, advance in, and maintain employment, economic self-sufficiency, independence, and integration into society. Through this mission the **Rhode Island Office of Rehabilitation is committed to ensuring equity in the provision of services to individuals with disabilities, including those students with disabilities attending secondary education as outlined in the Rehabilitation Services Administration CFR-34 rules and regulations around vocational rehabilitation programs.**

ORS details in the State Plan Description (j) Coordination with Educational Officials the plans, policies, and procedures for coordination between ORS and Rhode Island department of Education to ensure transition of students with disabilities in education services to vocational rehabilitation service. Additionally, Description (l) Interagency Cooperation with Other Agencies details the agencies interagency cooperation with entities outside the Workforce Development System to reach and provide services to individuals with disabilities. ORS, in conjunction with the State plan team, including the State Rehabilitation Council worked to review the format and content of the State Plan and to set ORS' goals and priorities, regulations, and planning activities. These goals were generated from the Statewide Comprehensive Needs Assessment (CNA), in compliance with federal Performance Measures as stated in Workforce Innovation and Opportunity Act, 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 and to eliminate barriers towards service delivery.

The findings of the 2021 CNA indicated four goals ORS should work on for FFY 2022 through FFY 2025. These four areas include:

Continued strategies to promote awareness of ORS and its scope of service:

1. Increase services to underserved and unserved populations;
2. Bridge gaps between employers and individuals; and
3. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

These goals were designed to ensure ORS commitment towards equitable access to, and equitable participation in, vocational rehabilitation services and programs.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

There are no anticipated barriers that may impede equitable access to the activities of the ORS Title I and Title VI grants for the duration of the grant period, however some possibilities include:

1. Recruitment and retention of qualified Vocational Rehabilitation Counselors, including VRCs with disabilities, diverse backgrounds, and cultural competence to meet the needs of Program participants.
2. Vendor/service provider challenges with staffing and retention of staff to provide services.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

ORS will ensure materials will meet the needs of populations being served and/or outreached to.

ORS will partner with Dorcas Place International to identify and outreach underserved populations and identify specific needs.

ORS will review data and determine alternate formats for underserved populations.

ORS will continue in the Comprehensive State Needs Assessment to place an enfacs on identifying who we are not serving and the barriers to accessing our services. This assessment will begin in FFY2024/25

In addition, ORS will:

- Identify areas of training needs for Community Rehabilitation Programs (CRPs) and implement training opportunities to improve services with an aim on best practice, identifying barriers and solutions.

- Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practices.
- Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
- Conduct liaison training to ORS VRC's and CRP's on annual basis to develop and improve the relationships between ORS and CRP's.
- Encourage vendors to provide a full continuum of VR services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
- Examine and modify, as needed and at least annually, the VR fee structure to ensure it rewards integrated employment outcomes and assists with eliminating barriers.
- Continue to offer Virtual Service delivery options.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The timeline for addressing identified barriers or issues of non-compliance will be addressed in accordance with the timelines established in the ORS State Regulations and State Plan goals and priorities.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

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GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
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1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

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GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

SUPPORTED EMPLOYMENT

A Division of the Rhode Island Department of Human Services, the Rhode Island Office of Rehabilitation Services Vocational Rehabilitation (VR) Program is the public state and federally funded program that assists individuals with disabilities to choose, prepare for, obtain, and maintain employment. The ORS Supported Employment program assists individuals with the most significant disabilities who have been unsuccessful with traditional employment strategies, and need ongoing supports, to choose, find, and keep employment.

Our mission is to empower individuals with disabilities to choose, prepare for, obtain, advance in, and maintain employment, economic self-sufficiency, independence, and integration into society. Through this mission the Rhode Island Office of Rehabilitation is committed to ensuring equity in the provision of services to individuals with disabilities, including those individuals with the most significant disabilities, as outlined in the Rehabilitation Services Administration CFR-34 rules and regulations around vocational rehabilitation/supported employment programs.

ORS details in the State Plan Description (e) Supported Agreement Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services the plans, policies, and procedures for coordination between ORS and Rhode Island Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to ensure individuals with the most significant disabilities receive supported employment services resulting in competitive integrated employment. Additionally, Description (l) Interagency Cooperation with Other Agencies details the agencies interagency cooperation with entities outside the Workforce Development System to reach and provide services to individuals with disabilities. ORS, in conjunction with the State plan team, including the State Rehabilitation Council worked to review the format and content of the State Plan and to set ORS' goals and priorities, regulations, and planning activities. These goals were generated from the Statewide Comprehensive Needs Assessment (CNA), in compliance with federal Performance Measures as stated in Workforce Innovation and Opportunity Act, 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 and to eliminate barriers towards service delivery.

The findings of the 2021 CNA indicated four goals ORS should work on for FFY 2022 through FFY 2025. These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;
2. Increase services to underserved and unserved populations;
3. Bridge gaps between employers and individuals; and

4. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

These goals were designed to ensure ORS commitment towards equitable access to, and equitable participation in, supported employment services and programs.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

SUPPORTED EMPLOYMENT

There are no anticipated barriers that may impede equitable access to the activities of the ORS Title VI grants for the duration of the grant period, however, possibilities include:

1. Recruitment and retention of qualified Vocational Rehabilitation Counselors, including VRCs with disabilities, diverse backgrounds, and cultural competence to meet the needs of Program participants.
2. Vendor/service provider challenges with staffing and retention of staff to provide services.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

SUPPORTED EMPLOYMENT

- ORS will ensure materials will meet the needs of populations being served and/or outreached to.
- ORS will partner with Dorcas Place International to identify and outreach underserved populations and identify specific needs.
- ORS will review data and determine alternate formats for underserved populations.
- ORS will continue in the Comprehensive State Needs Assessment to place an enfases on identifying who we are not serving and the barriers to accessing our services. This assessment will begin in FFY2024/25

In addition, ORS will:

- Identify areas of training needs for Community Rehabilitation Programs (CRPs) and implement training opportunities to improve services with an aim on best practice, identifying barriers and solutions.
- Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practices.
- Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
- Conduct liaison training to ORS VRC's and CRP's on annual basis to develop and improve the relationships between ORS and CRP's.
- Encourage vendors to provide a full continuum of VR services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
- Examine and modify, as needed and at least annually, the VR fee structure to ensure it rewards integrated employment outcomes and assists with eliminating barriers.
- Continue to offer Virtual Service delivery options.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The timeline for addressing identified barriers or issues of non-compliance will be addressed in accordance with the timelines established in the ORS State Regulations and State Plan goals and priorities.