#### b. Request for Waiver of Statewideness

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

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

N/A

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

N/A

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

N/A

#### c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

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

#### 1. Federal, State, and local agencies and programs;

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

#### 2. State programs 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. 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.

#### 3. 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.

#### 4. Non-educational agencies serving out-of-school youth; and

ORS has cultivated a strong working relationship with the one RI independent living center Ocean State Center for Independent Living (OSCIL) to augment vocational rehabilitation services. OSCIL center has the ability to 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.  This joint collaboration with the Westerly Education Center on provision of employment-specific job exploration programming should lead to skilled job opportunities.

#### 5. 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.

#### d. Coordination with Education Officials

Describe:

#### 1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

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

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

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

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. 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 is able to 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 2022- FFY 2024. 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.  Other Pre-ETS services being explored or expanded on for PY 2021-22, include: job exploration services to students with disabilities starting at age fourteen that began as a pilot with 10 LEAs with hopes to continue expansion State-wide; 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 work shop; a collaboration with The University of RI’s S.T.A.R.T. URI, a transition program working with students with Autism/Asperger’s; and a person-centered job exploration pilot with the Regional Transition Centers and LEAs focused on improving transition services for significantly disabled students utilizing discovery and customized employment

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.

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

##### A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

RIDE has contracts with the Regional 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 that facilitates the development and implementation of their individualized education programs;

ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, 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 youth 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. ORS, in partnership with the Regional Transition Centers, is piloting a school to work project which will incorporate person-centered job exploration/discovery for students with I/DD prior to exit. This collaboration consists of team members from LEAs, ORS, BHDDH and Adult Providers to achieve successful outcomes and consistent messaging.

##### C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for 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. 1 54(b)361.22(c), 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 EDUCATON AGENCY (LEA) RESPONSIBILITES:

• 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.

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. Cooperative Agreements with Private Nonprofit Organizations**

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational 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.

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

Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two (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. ORS sponsors and provides 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 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.

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 significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. 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.

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 in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop, enhance and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The CD obligates ORS to (1) ensure in-school youth with I/DD engage in a 120-day Trial Work Experience prior to leaving high school, (2) CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and (3) establishment of a Continuous Quality Improvement review of each DD agency providing SE services. RIDE and ORS are working closely on the Trial Work component to ensure youth have varied experiences in their interest area.

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 while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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. Once the COVID restrictions are lifted, 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.

#### g. Coordination with Employers - Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

#### 1. VR Services; and

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. 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 business environment. The employer provides feedback to the agency and the customer about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS 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 collaborated with the CRP’s to immediately address how to ensure services did not lapse. ORS developed an array of Virtual Services to ensure that individuals would continue to receive vocational services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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. Once the COVID restrictions are lifted, 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 employment services were not available. These Virtual Services were developed across SE, Non-SE and Pre-ETS fee for service programming.

In the post-COVID economy, ORS will 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.

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 in order 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.

### h. Interagency Cooperation

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

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

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

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

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services (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 up through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Law Center, 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.

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

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

ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities.

ORS sponsors and participates in the Developmental Disabilities Supported Employment Advisory 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 integrated competitive 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 of 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.

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 in order to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA.  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.

#### 3. The State agency responsible for providing mental health services.

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH).

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. 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.

The objective of the SE services is in integrated competitive 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.

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

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island America’s Job Centers (AJCs) formerly the netWORKri One-Stop Centers.  ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI.  ORS personnel provide consultation to the AJC’s One-Stop staff on disability issues, accessibility considerations, and assistive technology, and are available for any cross-training opportunities that would apply to VR. ORS will provide One Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to AJC One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may better educate or equip the AJC staff in order to assist individuals with disabilities.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence/Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board and a subcommittee for Employment for People with Disabilities that ORS personnel attend, and also participate in annual Request for Proposal reviews.

RI has two Workforce Investment Boards (WIBs). ORS is an active participant in the Disability Committee required by WIOA.

Budgetary issues in 2017 resulted in ORS implementing a change in Order of Selection to a stricter eligibility standard as of December 19, 2017. This resulted in increased collaboration and interaction with AJC One-Stop Centers and DLT programming. This created ample opportunity for strengthening the relationship between DLT, ORS, and BHDDH for common purposes and addressing Consent Decree demands.

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

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

#### 1. System on Personnel and Personnel Development

##### A. Qualified Personnel Needs

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

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

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

**QUALIFIED PERSONNEL NEEDS**:

In FFY 2020, ORS provided services to approximately 2,095 individuals, with an average caseload of 56. ORS has a total of 91 full-time equivalent (FTE) positions, which includes 43 MA level Vocational Rehabilitation Counselor positions. When approved, ORS has continued to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All new counselors have Master’s Degrees in Vocational Rehabilitation Counseling. During FFY 2020, nine (9) ORS staff retired or left the agency, leaving vacancies in the following positions: (4) VR Counselor I positions, (2) VR ii positions, (1) Peripatologist, (1) Chief Human Services Business Officer, and (1) Senior Human Services Business Officer.

In FFY 2021, eleven ORS staff retired, were promoted, or left the agency leaving vacancies in the following positions:  four (4) VR Counselor I positions, four (4) VR Counselor II positions, one (1) Sr. Food Service Administrator, one (1) Food Service Administrator, and one (1) Sr. Word Processing Typist. After promotions and positions being filled, there are currently eight (8) VRC I positions, one (1) Rehabilitation Counselor, one (1) Vision, Rehab. Orientation & Mobility Specialist, and one (1) Jr. Resource Specialist unfilled. Over the next 3- to 5-year period, ORS estimates that approximately 15-20 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

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

Vocational Rehabilitation Counselor I - 28

Vocational Rehabilitation Counselor II – 15

Supervisory - 10

Administrative - 8

Fiscal - 6

Case Aide – 1

Support Staff – 12

Social Services - 7

Direct Services - 5

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

Vocational Rehabilitation Counselor I - 8

Vocational Rehabilitation Counselor II – 0

Supervisory -0

Administrative - 0

Fiscal - 0

Case Aide - 1

Support Staff – 1

Social Services – 1

Direct Services - 1

###### iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Vocational Rehabilitation Counselor I – 1

Vocational Rehabilitation Counselor II – 1

Supervisory - 2

Administrative - 1

Fiscal – 2

Case Aide - 1

Support Staff - 2

Social Services – 1

Direct Services - 3

##### B. Personnel Development

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

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

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI.

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

As of FFY 2021, there are 61 students enrolled in the graduate programs (t Assumption College reported 49 currently in the M.A. Rehabilitation Counseling Program and 2 in the C.A.G.S. Rehabilitation Program and at Salve Regina University indicated having 7 currently in the M.A. Rehabilitation Counseling Program and 3 in the C.A.G.S. Rehabilitation Program)

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

Assumption College - 17 Graduates from previous year with a MA in Rehabilitation Counseling and 0 with a C.A.G.S. in Rehabilitation Counseling.

Salve Regina University - 2 Graduates from previous year with a MA in Rehabilitation Counseling and 2 with a C.A.G.S. in Rehabilitation Counseling.

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

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

ORS has ongoing communication with Assumption College and Salve Regina University to ensure that the present and projected needs of ORS are considered in the program planning. Both offer a MA in Rehabilitation Counseling via a combination of on-campus and distance learning.

ORS VR Administrator and Supervisors work with the schools to provide an opportunity for students to meet with ORS to learn about Vocational Rehabilitation Services in the State VR agency, to promote the opportunity of practicum and internship opportunities and the application process for posted positions as available.

Additionally, ORS maintains a recruitment list and sends position posting to the education institutions and interested individuals.

ORS VR Administrator and regional VR Supervisors met with VR students, recent alumni, and staff of Salve Regina University, Assumption College, and UMASS Boston on May 20, 2021 to inform graduates of upcoming positions to be posted as well as educating attendees on the benefits of working for a State VR agency.

#### 3. Personnel Standards

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

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

**1. ADEQUATELY PREPARED AND TRAINED STAFF**

Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. While the Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master’s Degree in Rehabilitation Counseling, due to recent lack of qualified candidates for vacancies, ORS will be exploring the possibility of allowing individuals with a Certificate of Advanced Graduate Studies (C.A.G.S.) or Certificate in Rehabilitation Counseling with a Master’s Degree in a related field.

All new Vocational Rehabilitation Counselors are required to meet the standard noted above of a Master’s Degree in Rehabilitation Counseling but as noted, ORS will explore the possibility of allowing individuals with a Certificate of Advanced Graduate Studies (C.A.G.S.) or Certificate in Rehabilitation Counseling from an accredited program with a Master’s Degree in a related field.

ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a Masters Degree in Rehabilitation Counseling, but lack of candidates raises concerns about being able to continue to meet this standard.

ORS will continue to offer 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 the VR Program.

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 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 27 VR Counselors, Supervisors, and Administrators who are CRC certified.

**2. ANNUAL PERSONNEL NEEDS ASSESSMENTS**

The 2021 Personnel Comprehensive Needs Assessment indicated the following training needs: Workforce Innovation and Opportunity Act, Effective Time Management, and Motivational Interviewing.

The Strategic Planning Coordinator and Training Coordinator of ORS elicited information from staff May of 2021, to establish a list of training topics.

Top areas of training need self-reported by survey respondents in descending order included:

**Disability and/or Underserved = 23**

Behavioral Health (BH), Personality Disorders, Update on Diagnostic Statistical Manual V (DSM V), BH barriers to vocational planning and Autism Spectrum Disorder (ASD), Rehabilitation Counseling/Emerging Treatments for COVID related long-term disabilities, Ethics, Dual Sensory, Vocational Planning for individuals with criminal backgrounds, Gender/LGTQ+ And transgender concerns**,** Assistive Technology (AT), Vocational Evaluation/Assessments, Motivational Interviewing, and Ticket To Work (TTW) Cost Reimbursement for Youth Age 16 to 18.

**Computer Programs = 10**

Teams, Adobe, SharePoint, Digital Literacy, General Computer training, IT needs, etc.

**Employer Engagement/Job Development = 10**

Displacing Employer myths, Customized Employment, Job Development (JD), Resume Writing, Role of VRC in JD, Marijuana use/ medical card and JD

**Effective Work Strategies = 8**

Leadership Training/Strategies, Effective Remote Working/Strategies, Time Management, and

Internal cross training for certain positions to help with coverage during vacation or leave

**ECMS (WIOA, System7, Inform) = 7**

WIOA Quarterlies, Quality Case Management, Case Documentation, Inform

**Agency Collaboration = 6**

BHDDH/PCSEP 3, Informational service-oriented trainings, Global understanding of statewide training/employment programs (DLT), How to better collaborate with other State agencies, Disability Rights RI Services

**Customer Service = 3**

Customer Service and Training with language line and Pinpoint

A training schedule is developed based upon the staff reported identified needs as well as the needs identified by Supervisory staff, RSA, and ongoing feedback from clients, WIOA partners, etc. ORS will review the training schedule annually to ensure the trainings provided during FFY 2022 through FFY 2024 meet the need of ensuring a well-trained workforce.

Training will also continue to incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA.

ORS utilized a variety of training providers from internal staff with a subject expertise, technical assistance centers, etc. Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: Diversity Training, Health Information Portability Act., Excel, MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc. Additionally, ORS has established a training budget which allows for staff and their supervisor to identify training that is specific to enhancing an individual’s skills within their current role and future employment goals

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

Training opportunities are provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices, assistive technology and the provision of vocational rehabilitation services to individuals with disabilities.   Through the Workforce Development System staff can attend training/orientation to WIOA partner resources held at the American Job Centers.  ORS has provided information to attendees on Order of Selection, Workplace Accommodations, Assistive Technology etc. During COVID-19, access to the America’s Job Centers was significantly curtailed. ORS is collaborating with AJCs to coordinate staff returning to the facilities.

Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Masters level in Vocational Rehabilitation Counseling. Additionally, all field VR Supervisors and Administrators meet the CSPD standard.

ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan. In FFY 2020 ORS implemented a Training Budget for all staff to enable staff and supervisors to better tailor an individual’s training needs based on current job requirement and professional growth.

ORS continues to structure mentoring activities around specific specialization areas in anticipation of future retirements.

All existing case aides, fiscal and support staff meet or exceed state requirements for education and experience.

#### 4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

##### A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of trainings offered/provided during the VR Quarterly Meetings include:  Annual - Disability Rights Rhode Island/Client Assistance Program and priority areas, RSA-911 PO1903 Changes to ECMS/System 7, Social Security Ticket to Work, Business Engagement Specialist Team, ATAP - The Accessibility of Chromebook – Build-In and Extensions. VRTAC-QM; Quality Fiscal Management. Transition Counselors – Disability Rights RI; Supportive Decision Making, ORS/RIDE Transition Conference. Supervisory training through University of RI, STAR Supervisory Training, Annual Federal Tax Identification and HIPPA, Eligibility Process and CAP Update, Physical Disabilities and Eligibility, Work Incentives Planning and Assistance: Introduction to SSD Benefits, Work Incentives and Employment Support Programs, Cultural Competency with Native Americans, Microsoft Live Trainings, Advancing 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, Social Security TTW Cost Reimbursement, Claim Denials. Marijuana & Other Prescription Drugs: Employment is Possible, Presenting Yourself: the Power of Networking With A Plan, Implementing Assistive & Smart Home Technologies for Independence, What is ATAP/Who Are We/What Do We Do, Introduction to Business Engagement for VR Counselors, 13th Annual Summit Conference on Performance Management Excellence, LM/TCI Plus VR Counseling & You, Regulations/Procedure/Public Drive, RSA-911 WIOA Guidance Quarterly Documentation, as well as Ethics trainings and other training opportunities via Stout Vocational Rehabilitation Institute, Virginia Commonwealth University, CRCC E-University, etc

ORS has also offered/provided the following to CRPs: Benefits of Becoming an Employment Network and Partnership Plus. Work Incentive Planning and Assistance: Introduction to SSD Benefits, work Incentives, and Employment Support Programs, and Business Engagement Specialist Team. Combined VR and CRP training included Integrated Resource Team, and Resume Writing 101. Additionally, ORS supported the following Behavioral Health/Development Disability Supported Employment trainings through its contract with the Paul V. Sherlock Center on Disabilities: Assistive Technology, Community Mapping, Self-Employment and Bringing Vocational Infrastructure, Services and/or Practices to Scale, and Business Engagement strategies to increase employment outcomes.

Training for all staff of ORS remains a priority. ORS will utilize and incorporate the training needs identified by staff in the setting up of trainings utilizing TA centers, internal staff subject expertise, etc : Additionally, ORS will continue to promote trainings offered through the RI Learning Center which offers a range of training via Academies, Workshops, Tutorials, Webinars,. CRCC E-University, VRTAC-QM, and other relevant training providers.

In order to retain qualified staff and in anticipation of additional staff retirement, ORS has and will continue to offer/promote leadership development training, succession planning, and capacity building opportunities to interested staff.

Management staff continues to include interested personnel in activities such as: assistive technology, transition, training, Community Rehabilitation Program (CRP) development, quality assurance, State Plan development, interviewing of applicants for positions, development of procedures, and strategic planning as a means of expanding agency knowledge base about these content areas.

Eight of the forty-three ORS Vocational Rehabilitation Counselors have been on the job for less than 5 years; thus, necessitating the training on vocational rehabilitation assessment, guidance and counseling, best practices, and ORS policies and procedures.

ORS believes that the next three- to four-year period will continue to be a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements.

The ORS Business Engagement Specialist Team (BEST) continues to be a critical link between ORS and the Business community, engaging in activities such as Business Ambassadors, advocates, and educators to the business community on the services of ORS, Workforce Development System and untapped/underutilized resources to meet their labor/business needs. The BEST members also provided employment and labor information back to their regions at monthly regional meetings as well as providing agency training.

ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.

The Training Coordinator and Strategic Planning Supervisor elicits input from counselors, supervisors, support staff, and administrators regarding their training needs.

If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS regulations & procedures, and union regulations.

ORS will enlist the Workforce Development Partners, BEST team and TA entities such as VRTAC-QM and SELN (via BHDDH) to assist with enhancing staff competencies in addressing the needs of business community.

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

ORS will continue to utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC/Workforce Innovation Technical Assistance Center (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 ORS 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.

#### 5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. 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 in order 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 whom 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 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.

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

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual 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 quarterly 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.

**STATE REHABILITATION COUNCIL**

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

### j. Statewide Assessment

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

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

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

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

ORS and the State Rehabilitation Council (SRC) completed a CNA in FFY 2021 for the FFY2022 State Plan. This assessment incorporated the new WIOA regulations and focused on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

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

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

* Community Comprehensive Needs Assessment Surveys for community rehabilitation providers (CRP)
* Employer Comprehensive Needs Assessment Survey
* Customer Satisfaction Survey
* 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
* Office of Rehabilitation Services Staff Comprehensive Needs Assessment Surveys
* Focus group with transition age youth/consumers and parents and ORS staff members. The 2021 CRP survey conducted by ORS and the SRC was sent to 62 CRP’s. 23 CRP’s completed the survey which represents a 37.1% return rate based on the 62 surveyed.

The CRP survey yielded the following as areas of need:

* When obtaining employment, access to programs to help improve social skills, personal home/life skills, job skills, job matching, individual expectations, family expectations and insufficient job search preparation are the most common individual challenges faced by individuals with disabilities.
* When obtaining employment for individuals, job availability, transportation, availability of job development and cost of job accommodations are the most frequent systemic barriers identified.
* When obtaining employment for individuals, fear of losing social security monetary benefits, losing subsidies and losing medical benefits are the most frequent financial barriers identified.
* When maintaining employment, social skills, personal/home life barriers, job skills, job matching individual expectations, family expectation and insufficient job search preparation are the most common challenges faced by individuals with disabilities.
* When maintaining employment for individuals, job availability, transportation, availability of retention supports, and cost of job accommodations are the most frequent systemic barriers identified.
* When maintaining employment for individuals, fear of losing social security monetary benefits, losing subsidies and losing medica benefits are the most frequent financial barriers identified.
* Increased awareness of resources (through ORS, the workforce development system, and employers) and increased communication were suggested to help CRP’s better meet the needs of consumers.
* Individuals with developmental disabilities, blind/visual impairments and mental/behavioral health were viewed as the least served disability populations in RI
* Individuals who identify as Cape Verdean, American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian were viewed as the least served racial and ethnic populations in RI

The CRP survey also indicated that:

* 87% of CRP respondents hold the credentials to provide supported employment services.

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

* 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.
* 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.
* 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:

* 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

In 2019, ORS re-designed the monthly consumer satisfaction surveys, with input from the SRC State Plan, Policy and Quality Assurance sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS, are in post-employment plan services and employment status. The re-designed surveys assist in capturing WIOA data, were rolled-out in April 2019 and the early data is undergoing continued phases of analysis.

The following conclusions were formulated based on the results of the Surveys conducted between April 2019 and March 2020 indicated the following needs

* ORS can improve their services by more responsive communication, helping customers obtain employment, timeliness of service and response, increased follow through, providing a wider array of services, and an increase to what ORS may fund for consumers. Nothing, or already being satisfied with ORS services, was the most common occurring response.

Additionally, the Customer Satisfaction Surveys indicated that:

* Supported employment, job placement, job coaching, and job development were indicated as the most important services
* Transition-aged individuals aged 14-24 were the largest population of survey respondents at 40% of all individuals who responded in the survey.
* Individuals with behavioral health, developmental and cognitive disabilities were the most frequently identified of individuals who responded in the survey.
* Response rate of those who identify as minorities rose since the 2017 CNA, with respondents indicating themselves 70% as White/Caucasian, 15% as Black/African American, 9% as Hispanic/Latino, 3% as American Indian/Alaskan Native and 2% as Asian.
* 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

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:

* 31% of workers with a disability were employed part-time, compared to 17% of workers without disabilities
* 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%).
* 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
* 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.
* 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.
* 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:

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

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

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:

* Employment trends/labor market information
* Business engagement
* Job development

Additionally, they identified these as needs for better assisting Individuals with Most Significant/Significant Disabilities and who require Supported Employment Services:

* Continue increasing the capacity and knowledge base of CRPs who provide Supported Employment services
* 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.
* Transportation to services that are available
* Increase the capacity of CRP’s to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
* Need for a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities.
* Need for CRP’s to have qualified trained personnel to provide a continuum of services.

##### B. Who identify as minorities;

**Rehabilitation Needs of those who identify as Minorities:**

* Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the State
* Incorporate interpretation and communication needs into the IPE for Underserved and Unserved Populations
* Engage the American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian communities through outreach and marketing strategies.
* Incorporate access to services for individuals who are not English-speaking or have English as a second language.
* Ensure services are readily available for emerging populations/minorities.

##### 

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

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

* Those with Physical Disabilities
* Those with Intellectual and Development Disabilities
* Those with Behavioral Health/Mental Health
* Those with Blindness/Visual Impairment

##### 

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

Surveys from ORS staff identified that the following areas needed to improve services:

* ORS can better collaborate with WIOA partners and the Workforce Development System through communication, information sharing, meetings and training.
* CRPs indicated the workforce development system needs to improve service delivery to Cape Verdean, American Indica/Alaskan Native, Pacific Islander/Native Hawaiian and Asian
* Dissemination and/or awareness of resources available through the workforce development system, increased awareness of employer resources,
* CRP’s indicated 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.

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

The 2021 Comprehensive Needs Assessment (CNA) identified, there were 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 that students with behavioral health concerns are also an underserved population.

ORS continues to enhance 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; and

The 2021 CNA identified similar barriers as in the previous CNA.

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

* Finding solutions to transportation barriers, finding ways to maintain CRP staff, providing easy access to benefits counseling and community-based jobs
* 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.
* Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
* To assess CRPs’ ability to work with varying populations and disabilities and find ways to improve delivering services and better employment outcomes.

Meeting the needs of the Business Community:

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

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

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:

* Increase student and parent awareness of the full scope of services available from ORS and what services ORS may, or may not, fund.
* Assist the public to develop a better understanding of the ORS process and scope of services by ORS
* Work in conjunction with CRP’s to assist individuals with disabilities in overcoming personal barriers towards obtaining and maintaining employment
* Increase the amount and frequency of services provided to underserved and emerging populations
* Market and alleviate the stigmas of disabilities in the workplace to bridge the gap between employers and individuals with disabilities
* Ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment plan
* Explore grants/funding sources such as Youth Build Grants
* Further explore and enhance service capacity for underserved/unserved individuals such as beneficiaries of SSI/SSDI
* Consider strategies on how to better connect to “at-risk” students outside of the schools, including those in juvenile correction and residential placement
* Provide education so that students who report feeling stigmatized/labeled understand the rehabilitation process better and become more engaged
* Expand outreach to other programs, such as youth centers, family resource centers, and career and education programs.
* Strengthen connections to higher education, particularly disability support service coordinators, to increase access to unserved/underserved youth and students with disabilities.
* Assist schools in increasing communication, access, and coordination for “at-risk” youth and students with disabilities who generally are not utilizing ORS services

### k. Annual Estimates

Describe:

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

For FFY 2022, ORS has a goal of 1,181 new applicants and expects 1,216 individuals to become eligible. ORS anticipates that 270 new Individualized Plans for Employment will be developed, and 541 successful outcomes achieved.  As of August, of FFY 2021 ORS has 758 new applicants and has determined 604 individuals eligible.  New Individual Plans for Employment have been developed with 501 and 134 individuals have been closed successfully.

For FFY 2023, ORS has a goal of 1,182 new applicants, with 1,217 individuals to become eligible for ORS services. ORS anticipates that 271 individuals will develop Individualized Plans for Employment, and projects 542 successful outcomes.

In FFY 2024, ORS projects 1,183 new applicants, with 1,218 individuals to become eligible for ORS services.  ORS anticipates that 272 individuals will develop Individualized Plans for Employment, and projects 543 successful outcomes.

ORS feels these above numbers are anticipated to be moving targets, as we project an eventual return to pre-covid conditions.

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

##### A. The VR Program;

**NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY**

As of 7/1/20 OOS Category I was opened. As of 2/1/21, category 2 was opened. Beginning on . 3/1/21, consumers in Category 3 are monitored monthly for determination to be taken off the wait list.

The projected number of eligible individuals to receive services in 2022 are:

OOS Category I – 1,715

OOS Category II - 273

OOS Category III - 27

Maintain Employment - 20

Total - 2,035

##### B. The Supported Employment Program; and

In FFY 2022, the projected number of Title VI to be served under an IPE is 543.

For FFY 2022 through 2024, ORS does not anticipate servicing individuals in category 3.

##### C. Each priority category, if under an order of selection.

OOS Category I - Title VI: 543

OOS Category II - Title VI: 3

OOS Category III - Title I: 0

ORS will take individuals off the Category I wait list as funds are available for services by date of application and will continue to assign to the wait list eligible clients who meet criteria for Category II or Category III.  ORS does not anticipate opening the waitlist for Category II or III during FFY 2020 through FFY 2022.

For FFY 2020 through FFY 2022, ORS will serve individuals with the most significant disabilities Priority Category I. ORS does not anticipate servicing individuals in Category 3 .

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

#### Consumers in category 3 will be monitored monthly for determination to be taken off the wait list. 4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

OOS Category I - Title I:   $1,249.48 X 1,715 = $2,142,858.20

OOS Category I - Title VI:  $1,249.48 x 543 = $678,467.64

OOS Category II - Title I:   $1,249.48 x 273 = $341,148.04

OOS Category III – Title 1: $1,249.48 x 27 = $33,735.96

### l. State Goals and Priorities

The designated State unit must:

#### 1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, 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 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.

#### 

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

**ALL OF THE FOLLOWING GOALS ARE FOR PY2021 and PY2023**

**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.

* Collaborate with Regional Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to present an Introduction to State Services to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.
* Collaborate with Sherlock Center and BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
* Explore technical assistance from VRTAC-QM on how better to market ORS services to the public.
* Develop video content/presentations regarding transition, general VR, Pre-ETS, etc, and post on ORS website, as well as the ORS Facebook social media page. These can also be shared on Facebook and LinkedIn when pertinent.
* 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.
* Increase ORS on-line presence via LinkedIN, Work without Limits, Indeed, Facebook and other social media.
* 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.
* 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 current information about business sector needs and state responses

* Establish a system to disseminate information to VR Counselors.
* Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
* Explore an alignment for methodology of On-the-Job Training (OJT) with DLT.
* Explore opportunities with all State Partners for collaborative and sequenced funding models for service delivery via TA from VRTAC-QM.
* Explore options for BEST to assist with hiring needs of business sectors.

**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.
* Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.
* 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.
* 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.
* Develop an internal tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board.
* Utilize System 7 to create database for staff to utilize and migrate to InFormed when new ECM system rolls out.
* Identify increased employer penetration via annual report to WIOA/DLT/GWB reporting.
* Explore introducing productivity goals for BEST to aim for to include collaborative successes with DLT/GWB and monitor goals.

**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 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.
* 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.
* 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.
* Design and modify programs and services as changing needs of customers are identified.
* Increase the amount and frequency of services provided to underserved, unserved and emerging populations.
* 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.
* 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 material meets the needs of populations being served and/or outreached to.

* Determine the need for ORS materials in alternative languages, formats, grade levels, etc.
* Review and modify existing materials and develop new materials as needed.

**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.

* Establish a system to disseminate information to VR Counselors.
* Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
* Explore an alignment for methodology of On-the-Job Training (OJT) with DLT.
* Explore opportunities with all State Partners for collaborative and sequenced funding models for service delivery via TA from VRTAC-QM.
* Explore options for BEST to assist with hiring needs of business sectors.
* Explore marketing options to employers and business community to alleviate the stigmas of disabilities in the workplace.

**OBJECTIVE 2**: 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.
* Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.
* 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.
* 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.
* Develop a tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board.
* Utilize System 7 and InFormed to create database for staff to utilize.
* Identify increase employer penetration via annual report to WIOA/DLT/GWB reporting.
* Explore introducing productivity goals for BEST to aim for to include collaborative successes with DLT/GWB and monitor.

**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: 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 initiated a pilot to 10 middle schools to introduce Pre-ETS services to students and will be expanding that to more LEAs.
* 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.
* Design and modify programs and services as changing needs of customers are identified.
* As a result of the Pandemic ORS collaborated with the CRP’s to immediately address how to ensure there was no lapse in service delivery to our customers.  ORS along with the CRP’s developed an array of Virtual Services to ensure that individuals would continue to receive vocational services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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.  Once the COVID restrictions are lifted, 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 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.

* Continue to coordinate the Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS and BHDDH will collaborate with quarterly group meetings and individual agency meetings to monitor quality 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.
* Explore Youth Build grants or other grants focused on youth/Pre-ETS population to maximize employment services for students and youth with disabilities.

**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.

* Identify gaps in the Ticket to Work Program related to services and VR Cost Reimbursement process.
* Explore the benefits of obtaining a “Ticket” tracker ECMS program.
* Continue to explore development of Employment Network Partnerships.
* Enhance staff knowledge of the Ticket to Work Program.
* Explore development of a Social Security Ticket to Work internal liaison team.
* 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.

**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.

* Ensure the InFormed ECMS development encompasses the requirements for WIOA measures and data reporting. Continue contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state
* Continue to educate staff to the WIOA data elements and established numerical targets that are required and need to be maintained, be timely, and accurate.
* Obtain guidance from RSA to establish specific numerical targets.
* Develop a reporting system to account for the increase/utilization of in Pre-ETS services and their effectiveness.
* Participate in Technical Assistance opportunities on capturing performance measures.

**OBJECTIVE 2**: Meet RSA requirements for eligibility and plan development.

* Determine eligibility within 60 days of application.
* Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination.
* Utilize MIS to track adherence to these standards on a quarterly basis; utilize individual performance targets for staff to aim for.
* Have VR staff utilize MIS system to better monitor their own 60-day and 90-day compliance and utilize performance targets to staff to aim for.

**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.

* Review the current regulations and procedures to ensure alignment with current business practices and quality service delivery.
* Review WIOA data contained in the RSA-911 and RSA Dashboard data.
* Enlist VRTAC-QM as relevant to provide technical assistance.
* Enlist support and assistance from SRC as relevant.
* Continue monthly customer satisfaction surveys.
* Continue 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.

* Provide Staff Training and support as the agency transitions from System7 to InFormed Electronic Case Management/MIS System.
* Utilize the wage interface tool within the Libera ECMS to upload reportable RI UI wage data. Utilize available wage data tools such as RI UI wage data, 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.
* 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, Zoom etc..
* Explore the benefits of a Ticket to Work “tracker” system that interfaces with the ECMS and available RI UI wage data.

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

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

Goals and priorities established were based on results of FFY 2021 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys. The next Comprehensive Needs Assessment will be for FFY 2024.

##### B. The State’s performance under the performance accountability measures of section 116 of WIOA; and

From the previous State Plan, ORS and the SRC identified (Goal 3, now Goal 5) that ORS will need to develop data collection and reporting methods that meet the new WIOA performance measures and RSA standards of practice. ORS is continuing to build the baseline for new WIOA performance measures. In order to meet this goal. , ORS plans to continue to determine the “what and how” of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures. ORS is also moving to a new MIS system, Libera InFormed, and VR Staff will need to learn how to input and ensure accurate data entry.

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

Results of 2018 RSA Monitoring Site Visit have been issued and received by ORS prior to the submission of this Program Years’ State Plan. ORS worked with VR Staff and Fiscal unit to implement technical assistance and procedural changes to ensure fiscal processes were in place; VR administration and supervisory staff worked with VR counselors to ensure 60-day eligibility correction actions were in place and monitored towards successful completion of CAP.

The State Rehabilitation Council has provided continued feedback to ORS regarding consumer satisfaction surveys, the 2021 Comprehensive Needs Assessment, order of selection wait list, service delivery and provisions, staff trainings, etc.

### m. Order of Selection

Describe:

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

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

**Order of Selection Description:** The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability -(i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and(iii) who has one or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations.”

**First priority** will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability, 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 two 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 two 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 2022- FFY 2024. 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.

##### B. The justification for the order

In FFY 2010 due to retirements, budget constraints, promotions, sick leaves and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities. All Category II and Category III individuals were placed on a Wait List for services. When resources have become available, Category II eligible clients have been moved off the Wait List. It was anticipated, at the time, that this restriction would continue through FFY2019.

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

During FFY 2018/2019 ORS continued to face the concerns noted at the end of FFY 2017, which necessitated continued closure of all categories in the Order of Selection. In FFY 2019, the agency requested $5,000,000 in re-allotment funds and received $1,150,157.  While funding constraints remain a concern, the additional funding enabled ORS to begin taking 25 individuals assigned to Priority Category I off the Wait List the first of every month, as of November 2018, based on date of application. ORS anticipated the same concerns through FFY 2021.

Through FFY 2021 due to upcoming retirements, vacancies, budget constraints, promotions, sick leaves and workforce reductions, ORS continued an Order of Selection for category III. Category I was opened on 7/1/20 and Category II was opened on 2/1/21.  Throughout FFY 2022 through FFY 2024, 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 2022-FFY 2024. 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.

##### C. The service and outcome goals

Projections for numbers to be served in FFY 2022 through FFY 2024 are based on the current census. These numbers reflect those currently being served or projected to be served.

Order of Selection (OOS):

FFY 2023 - OOS Category I:  1,715

FFY 2024 - OOS Category II:  273

FFY 2023 Title VI to be served: 543

FFY 2024 Title VI to be served: 544

Successful Closures:

FFY 2022 Successful Closures: 541

FFY 2023 Successful Closures: 542

FFY 2024 Successful Closures: 543

FFY 2022 Maintain Employment Clients: 20

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.

##### D. Time within which these goals may be achieved for individuals in each priority category within the order; and

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

Maintain Employment Clients- 6 months

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

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the most significant disabilities, Priority Category I. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to prepare for and engage in gainful employment in an integrated setting. Beginning 12/19/17, ORS closed all categories and took individuals off the Category I Wait List as funds are available for services by date of application. Although Categories I, II, and III are currently opened, and ORS does not currently have a Category I, Category II, or Category III Wait List, ORS will still operate under an Order of Selection for FFY 2022- FFY 2024. 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.

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

Yes. ORS and the SRC have had multiple discussions at the SRC meetings regarding Order of Selection changes, impact and implementation, from the time all categories were closed until the time all categories were opened in 2021. The SRC offered feedback, guidance and support throughout the process with the goal of ensuring transparency to individuals seeking VR services and educating the Community Rehabilitation Programs. The SRC has recommended that ORS explore the ability to elect to serve individuals who require specific services or equipment to maintain employment. With the wait list eliminated, and all categories open, ORS will explore this in FFY 2022, allowing for post-employment services to those individuals closed successfully who require a single service to maintain employment and had an IPE prior to closure. However, any individual that is will looking for VR services to maintain employment but had never been an applicant before, will need to apply and be found eligible for services. These applicants will be subject to the OOS requirements of at least one area of significant functional limitation and the need for more than one service over an extended period of time.

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 2022 - FFY 2024. 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

For FFY 2022 through FFY2024, ORS anticipates we will continue to serve all eligible individuals.

n. Goals and Plans for Distribution of title VI Funds

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

**STATE’S GOALS AND PLANS FOR TITLE VI FUNDS**

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, policies, and planning activities for PY2020 - PY2022 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.

**ALL OF THE FOLLOWING GOALS ARE FOR PY2022 and PY2024:**

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

**OBJECTIVE 1**: 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.

* 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 ORS services.
* Collaborate with Sherlock Center and BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
* Explore technical assistance from VRTAC-QM on how better to market ORS services to the public.
* Develop some video presentations regarding transition, general VR, Pre-ETS, etc, and post on ORS website.
* Increase ORS on-line presence via LinkedIN, Work without Limits, Facebook and other social media.
* 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.
* Collaborate with BHDDH and Sherlock Center to facilitate two Vendor Fairs. First fair to be held virtually in 2021 and a follow up face-to-face fair in 2022. The fair will be an opportunity for CRP’s, ORS counselors, BHDDH social workers and self-directed individuals to gather information about the CRP’s, the areas they provide services to and what specific services they currently offer.

**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.

* Establish a system to disseminate information to VR Counselors.
* Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
* Explore an alignment for methodology of On-the-Job Training (OJT) with DLT.
* Explore opportunities with all State Partners for collaborative and sequenced funding models for service delivery via TA from VRTAC-QM.
* Explore options for BEST to assist with hiring needs of business sectors.

**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.
* Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.
* 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.
* 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.

**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 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 initiated a pilot to 10 middle schools to introduce Pre-ETS services to students and will be expanding that to more LEAs.
* 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.
* Design and modify programs and services as changing needs of customers are identified.

**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.

* Establish a system to disseminate information to VR Counselors.
* Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
* Explore an alignment for methodology of On-the-Job Training (OJT) with DLT.
* Explore opportunities with all State Partners for collaborative and sequenced funding models for service delivery via TA from VRTAC-QM.
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* 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.
* 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.

**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: 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 initiated a pilot to 10 middle schools to introduce Pre-ETS services to students and will be expanding that to more LEAs.
* 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.
* 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 5: 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 from System7 to InFormed 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 age 14-24. ORS anticipates that each population of youth will need different SE services and approaches to that ensures support 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 in order 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 on a monthly basis.

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 on a monthly basis.

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

* Enlist 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.

### o. State's Strategies

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

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

PY 2022 and PY 2023 goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title I and Title VI Funds will be realized through the following strategies:

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

The 2021 Comprehensive Needs Assessment (CNA) and subsequent SRC review indicated four goals ORS should work on for FFY 2022 through FFY 2024.

ORS plans to expand and improve services through: (1) promoting increased awareness of VR services via marketing and accessibility of information about the agency, using social networking and other platforms;, (2) increasing services to underserved and unserved populations via staff training and community outreach to identify those populations and develop strategies to assist with service delivery;(3) bridging gaps between employers and individuals via improved relationships with the business community through the Business Engagement Team (4) helping individuals remove personal and other barriers they fact to obtain and maintain competitive integrated employment focused on client preparation for an employment outcome, analysis of internal processes and methods to improve operational systems and overall services to clients; and (5) developing data collection and reporting methods that meet the common performance measures and RSA standards of practice as evidenced by Agency ability to meet reporting and status change expectations of RSA..

The overall purpose of ORS, as reinforced by WIOA and the RI Governor’s Workforce Board (GWB) system-change initiatives, is to increase the competitive integrated employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next several years will include continued collaboration with other state agencies to develop a coordinated approach to implementing a business-needs and customer-driven service delivery system, as described in the GWB’s Comprehensive System Improvement Plan (CSIP). This revised service-delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer. ORS has developed a Business Engagement Specialist Team (BEST) to forward the goals of increasing business engagement and increasing opportunities for employment for individuals with disabilities.

* ORS will enlist its partners to identify local businesses to develop targeted hiring initiatives and possible training opportunities to meet the specific needs of local business sectors.
* ORS will enlist the internal BEST team to facilitate and increase business and employer outreach
* ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS continues to advocate for the Vocational Rehabilitation needs of individuals with disabilities as the State re-aligns its workforce development resources.
* ORS will explore with BHDDH and DLT on initiatives such as Let’s Get to Work, RealJobsRI initiatives and to explore the possibility of regionalized job development collaboratives who have the ability to sequence funding from multiple streams: BHDDH, ORS, DLT, TANF, etc..
* ORS will look at best practice models used in other states for sequenced funding.
* ORS will build on current initiatives with DLT and GWB
* ORS will encourage WIOA partners to include requirements that target hiring individuals with disabilities.
* ORS will continue to grow its business partnership utilizing previous successful models with other area businesses and continuing to build on BEST progress in outreach to the business and employer community.

The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three-year increments, will incorporate the findings of the CSIP and identify additional assessment areas.

* ORS will focus on better collaboration with WIOA partners and the workforce development system through communication, information sharing, meetings and training.
* Increased dissemination and/or awareness of resources available through ORS, available through the workforce development system and increased awareness of employer resources.
* Participation in employment experiences for individuals with the most significant disabilities, including Supported Employment, in-school youth and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE).
* ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage.
* ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery Principles and Practices into service delivery in order to increase expectations that individuals with significant intellectual and behavioral health disabilities can obtain quality employment outcomes in integrated settings at competitive wages.
* ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment decisions. ORS will provide CRP education and program development on the benefits of becoming an Employment Network (EN), towards developing the continuum of EN services for people with disabilities in RI
* ORS will continue to update its webpage to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development. ORS also posts regularly on employment, agency updates, and pertinent current events on the agency’s Facebook and LinkedIN pages.
* Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will continue to expand communication through a larger online presence. In addition, orientation groups, literature distribution about the agency, presence at the America’s Job Centers (netWORKri One-Stop Centers,) and participation in resource education events around the state will enhance referrals and visibility. The ORS Business Engagement Specialist Team will continue to communicate and collaborate with local business for the benefit of matching ORS consumers with employment in their fields of choice and qualifications.
* ORS will continue to elicit feedback from customers through satisfaction surveys and engage the SRC in the review of the data.
* ORS will continue to conduct case reviews quarterly and as a needed based on consumer feedback.

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

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

ORS utilizes a broad range of assistive technology services, such as the Assistive Technology Access Program (ATAP)Partners that are funded through State Grants for Assistive Technology, ORS Assistive Technology fee-for- services, and purchasing devices through approved vendors. Assistive Technology needs are person-centered and, on a case-by-case basis.

ORS staff will have access to and be encouraged to attend ATAP trainings.

ORS utilizes the ATAP Partnership for demonstration, information and assistance, device reutilization, and device loan to explore if assistive technology would be appropriate for acquisition to assist individuals with disabilities in the rehabilitation process. Device Loan can also be utilized for vocational assessment, as well as the bridge from one device to acquiring another.

ORS has vendor-approved services through fee-for-services to provide detailed assistive technology services, such as assistive technology assessment, assistive technology installation and repair, assistive technology training, worksite assessment, and device acquisition.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults, students, and youth with disabilities. The Deaf & Hard of Hearing unit and Services for the Blind and Visually Impaired (SBVI) unit are especially knowledgeable about assistive technology. Services for the Blind and Visually Impaired rehabilitation teachers review assistive technology needs of individuals with visual impairments or legal blindness. ORS also houses the ATEL program that operates an assistive technology lab for individuals who are Deaf or Hard of Hearing and/or have other speech and neurological impairments to have the opportunity to trial assistive technology equipment.

The provisions above continue to assist in making informed choices about equipment, and for using try-outs prior to making appropriate purchasing decisions. ORS has been mindful of working with individuals that are multi-layered in their needs for assistive technology and continues to work with both fee-for-service vendors and ATAP Partners in identifying the needs of individuals with disabilities.

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

ORS continues to monitor outcome ratios for populations identified as minority in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging underserved or unserved populations.

ORS will continue to review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes. ORS is exploring further development of CRPs who provide ESL training and other skills-based training to begin looking at providing other vocational services for ORS in order to streamline process, create one-stop service delivery, and increase efficiency for VR services.

ORS ensures all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternate formats, as needed.

ORS will establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities, adults, and youth who are no longer in school.

Staff will attend in-service trainings on cultural sensitivity and competence, including instruction on use of interpreters; etc.

ORS will formulate strategies to maintain communication-promote an increased awareness of scope of services ORS can provide and increase services to unserved and underserved populations (and populations who identify as minority) from application through service delivery to a quality employment outcome.

ORS has identified the needs of minority and limited English-speaking populations and developed new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

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

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

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

Transition and Pre-ETS incorporates services for the DOJ/State Consent Decree identified youth with significant intellectual disabilities, as well as for all student with disabilities potentially eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all student with disabilities with I/DD beginning at age fourteen and reviewed annually. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities for students with disabilities may include such services as: Job Explorations, and Assessments; Community-Based Work Experiences; Participation in Transition Academies; Summer Work Experiences for In-School Youth (Employment Alliance - an extended school year paid work experience supported by ORS and an LEA as well as the four-week paid work experience funded by ORS to an ORS approved provider); Project Search, and a pilot of a summer internship program specifically designed for young adults in 2 year and 4 year degree programs.  In 2018/2019, ORS developed a pilot for the provision of Pre-ETS to students in 10 middle schools, and this program will expand Statewide in 2021/2022.

As a result of the Pandemic ORS collaborated with the CRP’s with a Pre-ETS or transition focus to immediately address how to ensure services to students with disabilities did not lapse.  As a result, ORS developed an array of Pre-ETS Virtual Services to ensure that individuals would continue to receive these services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State, RIDE, and Federal COVID guidelines. The array of virtual transition services produced successful results in keeping students engaged in services and to assist them in moving forward towards their vocational goals.  Once the COVID restrictions are lifted, the virtual services will remain available on a hybrid basis and will be utilized for students 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 employment services were not available.

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

The Assistant Administrator for Vendor Affairs/Workforce Development continues to hold regular meetings with Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation on the ORS Continuous Quality Improvement Team, the agency has developed a Quality Assurance program initially for Supported Employment providers.

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

The Rhode Island Office of Rehabilitation Services (ORS) will continue to modify a fee-for-service structure with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities utilizing the information from the FFY 2017 Statewide Comprehensive Needs Assessment (CNA).

As a result of the Pandemic ORS collaborated with the CRP’s to immediately address how to ensure services to individuals with disabilities did not lapse.  As a result, ORS developed an array of Virtual Services for SE, Non-SE and Pre-ETS to ensure that individuals would continue to receive these services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State, RIDE, and Federal COVID guidelines. 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.  Once the COVID restrictions are lifted, 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 employment services were not available.

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

ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.

In addition, ORS is exploring development of productivity goals for VRCs and supervisors to monitor regarding monthly monitoring of timeline requirements to determine eligibility and IPE development are in place. It is hoped that VR Counselors will have annual performance targets for maintaining 90% compliance in 60-day eligibility and 90 day to IPE as well as successful employment outcomes. ORS will work to gather baseline performance information that will provide the basis for improvement strategies moving forward and the addition of other performance targets, likely with the BEST group.

ORS will continue to seek guidance from the RSA and VRTAC-QM to establish and meet WIOA performance measures.

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

ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Assistant Administrator of Vendor Affairs/Workforce Development interacts with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women’s Business Enterprise (WBE), and Minority Business Enterprise (MBE) trade organizations. The Department of Human Services (DHS) is represented on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Sub committees. ORS staff review RFPs of Rhode Island’s two Workforce Investment Boards, and youth programming; and advocates strategies for the inclusion of youth with disabilities in the Governor’s Workforce Investment initiatives.

ORS, through its parent agency, Rhode Island Department of Human Services, and as required by WIOA, is a financial and programmatic partner with Rhode Island America’s Job Centers (AJCs). ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston AJCs. While COVID has had an impact on the availability in person for VR Staff at AJCs, ORS has maintained regular contact with the AJCs and made sure staff were available via virtual platform as needed.

ORS personnel provide consultation and training to the AJC staff on disability issues, accessibility considerations, and assistive technology. ORS will provide AJC Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to AJC Staff. While COVID has had an impact on the availability in person for VR Staff at AJCs, ORS has maintained regular contact with AJCs and made sure staff were available via virtual platform as needed. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of AJC Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the AJC Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships.

ORS provides leadership and consultation to enhance the vendor community to becoming more integrated into the workforce development system. Providing case-specific consultation, as well as education about business practices, employment outcomes, and accountability, has become a focus of the dialogue between ORS and its approved vendors.

ORS will define how ORS, Adult Education, and Department of Labor and Training will be collaborating on adult education and apprenticeship programs through technical assistance from RSA on this topic.

ORS has developed a Business Engagement Specialist Team (BEST) to forward the goals of increasing business engagement and increasing opportunities for employment for individuals with disabilities, which will aid in the continued work with the Workforce Development System in RI.

* ORS will enlist its partners to identify local businesses to develop targeted hiring initiatives and possible training opportunities to meet the specific needs of local business sectors.
* ORS will enlist the internal BEST team to facilitate and increase business and employer outreach
* ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS continues to advocate for the Vocational Rehabilitation needs of individuals with disabilities as the State re-aligns its workforce development resources.
* ORS will explore with BHDDH and DLT on initiatives such as Let’s Get to Work, RealJobsRI initiatives and to explore the possibility of regionalized job development collaboratives who have the ability to sequence funding from multiple streams: BHDDH, ORS, DLT, TANF, etc.
* ORS will look at best practice models used in other states for sequenced funding.
* ORS will build on current initiatives with DLT and GWB.
* ORS will encourage WIOA partners to include requirements that target hiring individuals with disabilities.
* ORS will continue to grow its business partnership utilizing previous successful models with other area businesses and continuing to build on BEST progress in outreach to the business and employer community.

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

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

The goal and objectives outlined by ORS to increase competitive employment opportunities for ORS customers and to provide a flexible service-delivery system that prepares customers for employment align with the 2017 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2017 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities.

ORS will continue to monitor the strategies put in place to address the concerns raised in the RSA 107 Monitoring Report to ensure ongoing compliance is maintained.

ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS’ collaboration with the AJC Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services. While COVID has had an impact on the availability of in person meetings, ORS has maintained regular contact with AJCs leadership and made sure staff were available via virtual platform as needed.

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

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

ORS will utilize Innovation and Expansion (I & E) funds during FFY 2022 and FF 2024 to support the activities of the SRC on State Plan Development, implementation of the 2021 CNA and review of data such as obtained from Client Satisfaction Survey, review of any updated regulations and procedures, etc.

ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Expansion of such efforts as expanded Project Search, business-based and business engagement training, Chamber of Commerce events, activities that promote Let’s Get to Work Initiative, Sherlock Center facilitation of the DD and BH Supported Employment Councils, and training to CRPs and VR staff on best practices in vocational services (NCISI, VRTAC-QM) will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes collaborative funding will be encouraged, and technical assistance from VRTAC-QM on how other states have found methods that have worked and promulgating those methods to State parties and CRPs.

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

ORS will increase the number of minority, unserved, and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.

ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers.

ORS will enlist the resources of interpreters, and ensure forms and information is accessible. Orientation groups are provided for potential applications to attend and apply for services, which will include an orientation group monthly with Hispanic bilingual staff, once COVID restrictions are lifted.

ORS maintains the ability to access information and the application for services on our website.

Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services. Fact sheets will be reviewed to ensure the materials are easily understood and are promoting increased awareness of VR services and information about the agency

ORS continues to identify needs of minority population and develop new bi-lingual services. ORS has identified and developed an internal group of VR Counselors who are bilingual to meet quarterly with a regional supervisor to strategize how best to meet the diverse needs of this underserved population.

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

Describe:

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

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

**STATE PLAN FOR VR TITLE I FFY 2020/PY 2019 AND FFY2021/PY 2020:**

The State Plan for FFY 2020/PY 2019 and FFY 2021/PY 2020 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the Department of Justice (DOJ) Consent Decree (CD) in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

Accomplishments:

Several new initiatives, fee-structure adjustments, an Adult Project Search, Pre-ETS services expanded to ten (10) middle schools LEA’s, and expanded training programs had been developed in response to the data analysis, the 2021Comprehensive Needs Assessment (CNA), and feedback from customers, vendors, and staff.

ORS continues to utilize a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. Our move to a tighter OOS and eligibility process has caused some concerns about continuing to meet 60-day eligibility and 90-day plan development requirements.  In our 2018 RSA monitoring visit, we were informed that ORS VR counselors should be utilizing extension waivers for IPE development as well as eligibility.  ORS developed a process to ensure that staff were trained on the precise methodology for extension letters. ORS also began development for utilizing dashboard items in ECF for VR counselors to be able to self-monitor cases they were assigned for 60-day and 90-day compliance.

Several of the other initiatives included: development and continuation of four Project Search sites in collaboration with four local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Department of Labor and Training (DLT), and Local Education Authorities (LEAs); development of partnerships with local businesses to provide on-site training and resultant employment for ORS customers; and development of a summer work experience specific to the career goals of customers attending college or post-secondary school.  ORS expanded Business Engagement Outreach practices by creating the Business Engagement Specialist Team (BEST). The team is made up of supervisors, administrators, and counselors who are assigned as liaisons to community businesses. The BEST team not only assists businesses with their workforce needs but also provides disability awareness training, tax incentive information and consultation on assistive technology solutions to employers and their employees as an accommodation.

ORS also increased collaborative efforts with BHDDH and DLT (through the Governor’s Workforce Board) to develop training and employment programming for individuals with intellectual and developmental disabilities (IDD) to increase vocational opportunities to meet CD goals.

ORS expanded CRP vendor services to minority/underserved population. ORS has begun initial discussion about working with several CRPs who specialize in services to those where English is either a second language or of limited ability.

**ACTUAL EMPLOYMENT OUTCOMES IN COMPETITVE SETTINGS:**

ORS reporting of employment outcomes had been done based on FFY.  As of this four-year State plan, ORS made the transition to reporting outcomes based on PY to better align with WIOA performance measure and RSA-911 data reporting.  Additionally, this shift has allowed the agency to place more of an emphasis on quality outcomes versus number of outcomes.

PY 2019

Successful Closures 233

Successful Transition Closures 94

Successful Minority and Underserved was 138

PY 2020

Successful Closures 161

Successful Transition Closures 52

Successful Minority and Underserved 83

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

Obstacles for PY 2018 and PY 2019 for Title I, VR, include the focus on in-school youth and Pre-ETS service delivery, and adult mandates from DOJ Consent Decree, which has compromised the agency’s focus on other transition and adult populations.  Also, a decrease in ORS’s request for re-allotment funds from RSA in 2017 resulted in moving to a tighter OOS eligibility process and closure of all categories.

Several staff retirements at ORS have resulted in loss of knowledge with replacement staff having to learn while transitioning positions.

Change in OOS categories and Wait List resulted in less fee-for-service funding and a decrease of vendor capacity.  That decrease has resulted in an unstable staffing pattern at those agencies, which in turn created a decrease in service delivery of quality services. In March 2020, the entire country was thrown into the COVID-19 pandemic which forced a recalibration on every practice of the Agency. In person services were suspended, and VR and CRP staff had to work remotely. Businesses shuttered their doors, laid off staff, and had to cope with the effects of the pandemic on every facet of life. The unemployment rate nationally and in the State skyrocketed. For VR, the pandemic affected course of new applications, service delivery and employment, as well as the ability of staff to perform their duties.

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

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

**STATE PLAN FOR SE Title VI FFY 2018 / PY 2017 and FFY 2019/PY 2018:**

The State Plan for FFY 2018 and FFY 2019 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the DOJ Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

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

**OBJECTIVE 1:** Partner with two to three sector businesses to address personnel recruitment and training needs

* ORS brought in an out-of-state vendor, Viability, who works out of Connecticut and Massachusetts that specializes in developing relationships and trainings for area businesses to meet their specific workforce needs. To date Viability has worked with two prominent R.I. businesses.
* ORS utilized current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with I/DD via a collaboration with BHDDH and DLT/ Real Jobs RI initiative. The site is RI Hospital, as part of the Lifespan Network. The second Project Search cohort was suspended in March 2020 due to the Covid Pandemic. This Project Search site is still unavailable due to the ongoing Pandemic and other employer sites may need to be considered if funding from the Dept of Labor and Training/Real Jobs program is still available.
* ORS collaborated with BHDDH on a CVS Customer Service Training funded by DLT/Real Jobs RI. While this training was initially focused on individuals covered under the Consent Decree (for those with IDD) the training was expanded to include those persons with behavioral health disabilities.

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

* ORS continues to have a consistent presence on the Governors Workforce Board, WIOA Interagency Workgroup, and other advisory groups.
* ORS has created an internal committee, the Business Engagement Specialist Team (BEST) that consists of VR Supervisors, Administrators, and Counselors, headed by the Assistant Administrator of Vendor Affairs/Workforce Development, to address employment and job development needs of the agency as a whole.  Once a business is connected to the BEST team, a liaison is assigned to that business as the point of contact and can assist the business with their workforce needs, disability awareness training, tax incentive information and assistive technology. ORS is currently working on developing a process to share specific job leads and employment opportunities between the Department of Labor and Training and ORS as to increase the number of appropriate candidates provided to the business.
* Except during the COVID-19 pandemic, ORS was able to maintain a daily presence at the America’s Job Centers One-Stops, which provides the foundation for a cohesive service delivery system to ORS customers. Once COVID restrictions are lifted, ORS will have identified staff liaisons to the various advisory groups return to those sites.  Nevertheless, ORS is available via virtual platforms to AJC staff for cross-training, consultation, and discussion about resources available to individuals with disabilities. ORS is currently working on a plan to return to the AJCs on an at least half day basis with set aside time to provide consultation regarding mutual or potential customers.
* The ORS Assistant Administrator of Vendor Affairs/Workforce Development disseminates job leads from businesses looking for applicants, and VR Staff also disseminate job leads and participant training opportunities from LinkedIn and Skills for RI.

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

* ORS Vocational Rehabilitation Counselors continue to collaborate and facilitate transition services for their assigned LEAs via Rhode Island College Transition Institute.
* Project Search expanded from three to four sites, with the continued goal to expand to five sites.  ORS has a total of four sites presently, Miriam Hospital, Blue Cross Blue Shield RI, Newport Hospital (all transition,) and RI Hospital (adult). ORS continues to enlist Viability, a current ORS vendor, to develop an additional Business/ORS training-employer partnership and a pilot for Pre-ETS.
* ORS has and will continue to explore partnering with emerging high wage business sectors.
* ORS has created an internal committee, the Business Engagement Specialist Team (BEST) that consists of VR Supervisors, Administrators, and counselors, headed by the Assistant Administrator of Vendor Affairs/Workforce Development, to address employment and job development needs of the agency as a whole.  Once a business is connected to the BEST team, a liaison is assigned to that business as the point of contact and can assist the business with their workforce needs, disability awareness training, tax incentive information and assistive technology. ORS is currently working on developing a process to share specific job leads and employment opportunities between the Department of Labor and Training and ORS as to increase the number of appropriate candidates provided to the business.

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

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

In-School Youth with Disabilities:

* ORS has a VR Counselor assigned to every high school and developed and enhanced 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. Fact sheets and FAQs pertaining to Pre-ETS were disseminated at Transition Nights, Individualized Employment Plan (IEP) meetings, Career Development Plan (CDP) meetings, and State Agency “Introduction to State Services” meeting with every high school.
* ORS completed a CNA in 2021 and identified trends and needs for Transition-Aged Youth and Adults, such as student and family awareness of the scope of services about the transition-to-adult services.
* In 2019, ORS began a fee-for-service pilot to introduce work exploration services at ten middle schools.  This pilot was created to implement the services at year 1, train school staff in year 2, and fade out in year 3, targeting students with disabilities and tracking specific demographic information. ORS hopes to expand this State-wide in 2020 via same fee-for-service process.
* As a result of the Pandemic ORS collaborated with the CRP’s with a Pre-ETS or transition focus to immediately address how to ensure services to students with disabilities did not lapse.  As a result, ORS developed an array of Pre-ETS Virtual Services to ensure that individuals would continue to receive these services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State, RIDE, and Federal COVID guidelines. The array of virtual transition services produced successful results in keeping students engaged in services and to assist them in moving forward towards their vocational goals.  Once the COVID restrictions are lifted, the virtual services will remain available on a hybrid basis and will be utilized for students 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.

Adults with Disabilities:

* ORS ensured a wide array of service providers and training programs enabled customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
* ORS completed a CNA in 2021 and identified the needs of individuals with the most significant disabilities, including those in need of supported employment, minorities with significant disabilities, underserved individuals and individuals served by other components of the workforce development system.
* 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 to ensure that individuals would continue to receive vocational services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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.  Once the COVID restrictions are lifted, 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 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 integrated competitive employment is the goal from services.

* ORS developed and implemented a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS has successfully completed the first round of evaluations and is presently determining if additional reviews will be done in collaboration with the Division of Developmental Disabilities. The ongoing Covid Pandemic has delayed the start of the review process but there are plans to move forward with the continuous review.
* ORS implemented training opportunities for SE vendors in assessment, task analysis, job development, job coaching, and customized employment.
* ORS has identified training needs for providers, as a result of CQI reviews, such as job coaching techniques, fading strategies, employment engagement strategies, and identifying employment goals.
* ORS will participate in a statewide collaboration with DLT, BHDDH, RIDE and Salve Regina University to hire more people with disabilities.
* ORS continued to collaborate with BHDDH on regular meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
* ORS continues to support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings on a monthly basis to identify obstacles and training needs.
* ORS continued to examine and modify, as needed, the VR fee structure to ensure it rewarded integrated employment outcomes.
* ORS is planning to collaborate with VR-TAC QM and BHDDH to implement a new sequenced funding training and booklet to help DD agencies maximize SE funding from both agencies.
* ORS began collaboration in January 2019 with several State Agencies, including with Governor’s Workforce Board (GWB), Department of Labor and Training (DLT), Behavior Health Developmental Disabilities and Hospitals (BHDDH) and Sherlock Center on Disabilities to coordinate and initiate a Statewide expansion of the culture of employment for persons with disabilities.  (“Employment First”)
* ORS has enlisted VRTAC-QM to initiate intensive TA that will integrate Employment First concepts to align with Let's Get to Work initiative via increased use of the IRT and IPS Models. BHDDH and RIDE have also been invited to attend these meetings.

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

* As part of CQI reviews, ORS researched and evaluated specific services and correlation with employment outcomes. As part of reviews, ORS tracks the placements and services as part of the report which leads to a joint QI Plan with provider.
* As part of the Consent Decree, ORS continues to collaborate with other State Agencies in developing training opportunities for Supported Employment Vendors to increase their skill level and knowledge which will result in improving integrated competitive employment outcomes.
* As a result of the Pandemic ORS collaborated with the CRP’s that provide SE services to immediately address how to ensure services did not lapse.  As a result, ORS developed an array of SE Virtual Services to ensure that individuals who require SE services would continue to receive those services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. The array of SE virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals.  Once the COVID restrictions are lifted, 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 employment services were not available.
* **GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.**

**OBJECTIVE 1:** Meet WIOA performance accountability measures:

* ORS maintains a consistent presence on the WIOA Interagency Workgroup. Partners have focused on their readiness to capture the new WIOA requirements, therefore discussions have been ongoing among the WIOA partners in the state as to what data and how the data will be reported to state partners.
* ORS has continued to work with Libera on the agency electronic case management system to collect WIOA performance measures as defined by RSA in June 2017 PD-16-04 and subsequent PD-19-03 for PY2020.
* The electronic case management System Administrator staff have recorded several videos on the “how to” of entering data into the ECMS WIOA Quarterly Update case flow form. These videos can be viewed on demand by staff and will be used as training tools based on data entry concerns noted on a quarterly basis. Additionally, these videos provide supervisors with a tool for onboarding of new VRCs, Student Interns, and other agency staff as warranted.
* ORS on a quarterly basis has worked with staff and supervisors on an individual basis to address WIOA reporting requirements and approaches to ensuring the data is entered into the ECMS on an ongoing basis. Staff continued to be notified of trainings us as Introduction: Credential Attainment Decision Tree Tool and Credential Attainment, available guidance documents, etc. Supervisors have been oriented to the RSA Quarterly Dashboard and relevant data contained therein. Training will continue to be provided to line staff and others as needs arise.
* ORS continues to utilize technical assistance opportunities provided through WINTAC and U.S. Department of Labor WorkforceGPS. ORS will benefit from ongoing technical assistance and guidance from WINTAC, WorkforceGPS, and RSA will be critical to ORS’s further understanding the establishment of the performance measure targets.

**OBJECTIVE 2**: Meet RSA requirements for eligibility and plan development:

* ORS continues to track and monitor monthly the 60-day eligibility and 90-day to individualized plan for employment compliance and recently implemented dashboards via the ECMS on these two data elements that provide Vocational Rehabilitation Counselors, Supervisors and Administrators ongoing data alerts. Regional Supervisors review this data with counselors to determine obstacles towards compliance.
* ORS provided several trainings for VR staff, which included VR Eligibility & OOS Refresher. Eligibility & CAP Update, Physical Disabilities & Eligibility and Ticket to Work & Presumed Eligibility.
* In addressing the RSA2018 site visit Corrective Action Plan for 60 day to eligibility, ORS Administration, Supervisors and QI maintained a monthly and quarterly review of the data and compliance rate.
* ORS provided guidance and training to VR staff on the ECMS entering of extension letters for both eligibility and plan development as it was noted staff were entering letters, though not via the mechanism which captured the data for RSA911 monitoring and reporting.
* ORS has successfully resolved the 60 days to eligibility by meeting the goal of 90% compliance.
* ORS also developed two separate programs targeting persons with Asperger’s with an eye on employment and social skills development. The two programs began as pilots in 2017 and have moved onto regular service delivery menu and continue as of today.
* For 2020-21 school year, ORS partnered with the University of RI for a Pre-ETS college program called S.T.A.R.T. URI. This program works with 10 first-year URI students diagnosed with Autism. It is a yearlong program, designed to create college community, promote academic achievement and advance retention by offering intentional and structured support. It also provides the student with a college summer work experience in their field of study after their first year.
* ORS also has expanded its Pre-ETS programming and service delivery, and created new innovative summer work experiences, work-based learning opportunities, and educated staff, schools, and families about options.
* ORS piloted a Pre-ETS fee-for-service program for potentially eligible students with disabilities aged 14 and above with 10 LEAs in 2019. This was a very successful pilot but due to COVID, we were unable to increase these partnerships for 2020-21. The plan is to move forward with additional schools for 2021-22.
* ORS is partnering with one of the Regional Transition Centers in a person-centered job exploration pilot. This pilot will include TA through Griffin and Hammis specific focused to three school districts and three student/families. The goal is to improve transition outcomes for significantly disabled students utilizing Discovery and Customized Employment. It will be a team approach inclusive of LEA, ORS, BHDDH, Adult Provider and student/family. The hope is for consistent messaging between transition programming and the adult service world.
* As a result of the Pandemic ORS collaborated with the CRP’s to immediately address how to ensure there was no lapse in service delivery to our customers.  ORS along with the CRP’s developed an array of Virtual Services to ensure that individuals would continue to receive vocational services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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.  Once the COVID restrictions are lifted, 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 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 3**:  Monitoring Wait List

* Provided weekly updates to Administration, BHDDH, and Executive Office of Health and Human Services (EOHSS) to identify Wait List number broken down by Category and Consent Decree population
* Provided Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
* Maintained and updated ORS website to report on number of individuals currently on Wait List
* Developed process for fiscal forecasting monitoring
* Identified other WIOA partners and resources for persons applying for services and placed on Wait List
* Continued to monitor Wait List on a quarterly basis

These strategies have enabled ORS to successfully open Categories I, II, and III, and to remove all individuals from the Wait List into services.

**STATE PLAN FOR Title VI FFY 2020/PY 2019 and FFY 2021/PY 2020:**

**ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:**

**PY19**

Successful Supported Employment Closures - 77

Successful Supported Employment Closures Minority and/or Underserved - 59

**PY20**

Successful Supported Employment Closures - 55

Successful Supported Employment Closures Minority and/or Underserved – 36

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

ORS saw during PY2019 and PY2020, the following factors that impeded the achievement of the goals and priorities:

Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems and change models to meet goals and priorities.

The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.

ORS’ own budgetary constraints have led to a significant change in Order of Selection categorization and moved more towards placement on Wait List.

**STATE PLAN FOR SE Title VI FFY 2020 and FFY 2021:**

Obstacles:

* The obstacles for Title VI program for FFY 2018 and FFY 2019 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment, and long-term supports for individuals with other behavioral health (BH) issues has seen a decrease in funding, CRP, and supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports. Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.
* An additional obstacle includes staffing deficits experienced by both the DD and BH agencies as a result of low wages and Covid 19 staffing shortages. The DD agency has recently advocated for and received an increase in State funding to specifically address an increase in Direct Support Professionals (DSP) wages to over $15 per hour.
* Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems and change models to meet goals and priorities but have seen little progress.
* ORS has outreached to DD and MH agencies to determine their interest in expanding their funding opportunities thru the SSA TTW Partnership Plus Program. ORS is attempting to increase the number of available Employer Networks in RI to not only provide additional supports for individuals with disabilities but to help agencies increase other funding opportunities for their agencies.
* The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.
* COVID-19: 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 to ensure that individuals would continue to receive vocational services while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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.  Once the COVID restrictions are lifted, 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 employment services were not available.  ORS has utilized the array of Virtual Services for Pre-ETS, Supported Employment and non-Supported Employment programming.

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

The WIOA performance accountability indicators are a new requirement for ORS. The agency began tracking the performance accountability data elements via the Electronic Case Management system 7/1/17. ORS anticipates its data collection of WIOA performance accountability indicators to continue to evolve as the agency staff become more familiar with the data elements reported in the RSA911, RSA Dashboards, and ECM system.  ORS has enlisted WINTAC and now VRTAC-QM to assist with TA in this area.

**WIOA Performance Measures**

PY19 and PY20

Employment 2nd Quarter after Exit – PY19 = 536/56.4%                     PY20 = 250/41.8%

Employment 4th Quarter after Exit – PY19 = 493/50.8%     PY20 = 314/43.1%

Median Earning in 2nd Quarter after Exit – PY19 = $3492.75           PY20 = $3185.227

Median Hourly Earnings at time of exit = PY19 - $11.04     PY20 - $12.35

Employment Rate/Rehabilitation Rate calculation for PY19 = 45.33% PY20 = 37.01%

ORS saw declines in the numbers between PY19 and PY20 due COVID and ongoing customer concern with maintaining and seeking employment as well as employment closures. However, ORS did see an increase in the hourly wage customers made at time of exit.

Measurable Skills Gains PY20 negotiated goal is 18.5% - PY19 = 44.4% PY20 – 25.8%

While the Measurable Skills Gains rate dropped from PY19 to PY20, which was during training program shutdowns and re-tooling to virtual services as well as ongoing uncertainty due to COVID, ORS did exceed the negotiated rate of 18.5% for PY20.

Effectiveness in Serving Employers Performance Measure 6 - The State of RI chose to measure:

Retention with the same employer 2nd and 4th quarters after exit. ORS numbers reflect – PY19 = 148        As of August 2021, PY20 = 32

Employer Penetration Rate – ORS provides a PY report to DLT the lead State WIOA partner.

| Employer Service | PY19 | PY20 |
| --- | --- | --- |
| Employer Information and Support Services | 4 | 23 |
| Accessing Untapped Labor Pools | 6 | 7 |
| Training Services/Including OJT | 1 | 0 |

 Other

Median Hours per week at time of exit - PY19 = 20            PY20 = 2424

Median Hours per week at time of exit for Supported Employment - PY19 – 15           PY20 – 15

Median Wage per week at time of exit for Supported Employment – PY19 - $10.50    PY20 - $11.50

In FFY 2020 there were 645 new applications for services; 793 IPE’s developed and 195 employment outcomes.  Additionally, 1022 individuals were made eligible and 545 were placed on the Wait List and 174 youth non applicant entered PRE-ETS services.

As of August 23, of FFY 2021there were4563 new applications for services; 520IPE’s developed and 144 employment outcomes. 73 individuals were determined eligible and added to the wait list and 445 youth non applicant entered PRE-ETS services.

Evaluation Standard 2 - Equal Access to Services:

Equal Access to Services: Utilizing the historic Performance Indictor 2.1 standard of .80% ORS exceeded the rate with .90% in FFY 2019, and .93% in FFY2020.

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

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.  In FFY 2021, ORS has utilized the SRC to assist with State Plan Development, final completion of state-wide Comprehensive Needs Assessment and ongoing review of Consumer Satisfaction Survey results.

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

Include the following:

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

**OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:**

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (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. 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: (1) to individuals with disabilities found eligible for SE Services and a limitation of extended services to 24 months for adults and 48 months for youth with disabilities. The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning 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. 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 of 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 in order to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment 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 while allowing CRPs the ability to maintain staff and to maximize customer’s safety; services were required to conform to the State and Federal COVID guidelines. 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. Once the COVID restrictions are lifted, 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 employment services were not available.

#### 2. The timing of transition to extended services

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for and included in the ORS customers’ Individualized Plan for Employment (IPE). The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to the Rehabilitation Act amended by WIOA, can fund extended SE services to 24 months for all individuals and extended SE services up to 48 months for youth with disabilities age 14 through age 24 with the most significant disabilities if those supports are not available through other means.

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.

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 through age 24 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.