

# **VR Portion of WIOA State Plan for the State of Rhode Island FY-2018**

## **Program-Specific Requirements for Vocational Rehabilitation**

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

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

### **a. Input of State Rehabilitation Council**

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

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

On behalf of the State Rehabilitation Council (SRC), we offer the following comments regarding the 2018 Two-Year Modifications for the Vocational Rehabilitation Services Portion of the WIOA Unified or Combined State Plan.

The SRC acknowledges and commends ORS' efforts to respond to a rapidly changing landscape created by changes to the Rehabilitation Act as amended by the Workforce Investment and Opportunity Act (WIOA), as well as by the continued implementation of the Department of Justice consent decree.

From the Council's perspective, these two-year updates are mainly clerical tasks since the update is primarily incorporating the data from the 2017 CNA into the existing State Plan document. Since the State Plan, Policy and Quality Assurance committee has had considerable input into both the State Plan and the CNA, we have few comments on the updates.

Specifically, the SRC comments will focus on six areas of the State Plan, including coordination with the State Department of Education, the Comprehensive System of Personnel Development, coordination with employers, and the Order of Selection, the PRE-ETS services and the relationship to the Consent Decree.

#### **1. V-VR(d) Coordination with Educational Officials**

SRC Comment: The Cooperative Agreement (CA) between ORS and RIDE provides the foundation for ORS Counselors' presence within each public high school in the state. Under the

CA, ORS assists in-school youth with disabilities in collaboration with each Local Education Authority (LEA). The transition and Pre-Employment Services prepare students for employment after high school and fall under the regulations as outlined in the 2014 version of WIOA. However, more recent State fiscal concerns and budgetary matters has required ORS to implement a more stringent Order of Selection (OOS), as of 12/19/2017, resulting in a Waitlist for services. As of the date of this letter, approximately 400 individuals with disabilities are on this waitlist, 27 of whom are covered by the Consent Decree. The implementation of the Waitlist has impacted Pre-ETS service delivery. Counselors will meet with potentially eligible students with disabilities to give them information regarding their choice of options.

The SRC encourages the Office of Rehabilitation Services to remain committed to assisting all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. The ORS Transition and Pre-Employment Transition Services Program requires that all students who are found eligible in Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility after coming off the Wait List, and updated as appropriate, and again prior to graduation. The SRC is supportive of this requirement and encourages ORS to continue the success of this program by maintaining the development of the IPE within the 90-day timeframe. Additionally, the SRC encourages and supports ORS' continued commitment to dedicate the required 15% of funding to this program.

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). This agreement 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 by 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. The SRC is supportive of these Agreements and encourages ORS to continue these relationships to provide education and training opportunities for students in transition, along with individuals who may be qualified for educational funding based on their IPE.

Additionally, the SRC supports ORS's work with RIDE and the local school systems. In spite of cuts in funding, we encourage ORS to continue to provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities, including VR services. Also, the SRC supports continued transition planning by personnel of the designated State agency and educational agency through the following activities: 1) continuing to facilitate the development and implementation of students' individualized education programs; 2) continuing to define the roles and responsibilities (including financial responsibilities) of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; and finally, 3) by continuing to adhere to procedures for outreach to and identification of students with disabilities who need transition services.

## **2. VI-VR (i) Comprehensive System of Personnel Development; Data System on Personnel & Personnel Development**

### Personnel Development

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. These two programs are the primary educators to provide qualified MA level rehabilitation counselors for ORS. The SRC would support ORS developing a similar relationship with other nationally accredited higher education programs at local colleges that could prepare MA-level counselors for employment with ORS. However, as of the date of this letter, no state-funded programs exist in RI.

Currently, Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. The ORS has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's Degree in Rehabilitation Counseling. The SRC strongly urges ORS to maintain this minimum requirement to ensure that individuals with a disability who access ORS services are working with the mostly highly qualified counselors who understand the medical, psychosocial, case management, education and employment needs of individuals with disabilities. Rehabilitation Counselors are also highly encouraged to obtain the State of RI Qualified Rehabilitation Counselor Certification, a certification approved by the DLT Office of Workers' Compensation Unit.

Additionally, the SRC recommends that ORS to continue to participate on Advisory Boards for both programs and to support and require that all state VR counselors get and maintain the national Certified Rehabilitation Counselor designation. The designation of Certified Rehabilitation Counselor (CRC) is an indication of an advanced level of specialized education and training, an adherence to rigorous standards of ethical practice, and an ongoing commitment to lifelong learning through continuing education credits. Rehabilitation counselors who have earned the CRC designation possess a marketable and valued credential that distinguishes them from other counseling professionals. The CRC certification also establishes a recognizable point of differentiation with employers and clients that promotes consumer confidence and protection in the workplace.

The Council strongly encourages ORS to continue to provide professional development training to its counselors. Counselors have identified specific areas in which they would like to update and expand their knowledge and counseling skills. These topics included Supported Employment, physical disabilities and employment, understanding ethics and Vocational Rehabilitation and Pre-ETS. The Council sees these professional training experiences as important opportunities to improve the quality of services to individuals with disabilities, and to continue to support and develop the competencies of ORS's counselors.

### **3. VI-VR(i)(6) Coordination of Personnel Development under the Individuals with Disabilities Education Act**

The SRC supports the ongoing collaboration between the VR Administrator and/or Assistant Administrator for Transition facilitates with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. This collaboration is critical for both agencies to regularly share information about current and changing trends, regulations, and practices.

The Council is encouraged that ORS continues to work toward providing training, 21st century learning, and outreach for individuals who have hearing and/or visual impairments. However, the SRC is concerned that the recent loss of funding will have an adverse impact on the ability of

ORS to serve the more severely disabled since the resources for providing assistive technology may not be available due to federal budget cuts.

#### **4. Vi-VR(g) Coordination with Employers**

ORS continues to partner with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS has identified two businesses, CVS and Alex and Ani, with whom to partner. The programs that have been developed prepare job candidates for the skills specifically required by the employer, and results in successful job matches. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but is also producing a qualified and specifically trained pool of candidates for two nationally and internationally known businesses located in Rhode Island.

The SRC recommends that ORS include the number of individuals that have participated in these training opportunities and the number of individuals who have obtained employment from these partnerships be included in the State Plan data.

Additionally, the Workforce Development Supervisor has developed more than 30 partnerships with a range of companies in Rhode Island. Job openings from these partners are shared with the 45 counselors who pass this information to appropriate job seekers who are ready to work and are potential candidates for the position. Once a qualified job seeker has applied for a position, and after a confidential release has been obtained, ORS contacts the employer to further develop the opportunity on behalf of the job seeker, including the offer of assistance in job modification, technology support and/or on the job training supports. The Council feels the Workforce Development Supervisor's position is a key component of ORS' ability to outreach to employers, and to assist customers with finding and keeping employment. The Council is determined that this position must be filled, despite recent retirements and hiring freezes in the State workforce, and will provide advocacy and support to ensure this happens.

#### **Marketing Outreach Strategy**

Over the next year, ORS will enlist its state partners and the SRC to develop a marketing plan that targets specific business sectors. Collaboration with the Governor's Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is essential as the State implements the Comprehensive System Change Plan (CSIP).

The SRC is encouraged by ORS's plan to develop a marketing strategy with its partners. The Council would like to work more closely with the Governor's Workforce Investment Board (WIB) by recruiting a new member from the WIB to sit on the Council. This position has been vacant for over a year and needs to be filled. This position is strategic in that the SRC wants to have greater input from employers and the DLT regarding the needs of employers in the State. The SRC supports ORS developing more innovative programming so that this collaboration will increase outreach to minority employers and to employers who have unmet labor needs that could be met through hiring people with disabilities.

#### **Pre-Employment Transition Services (Pre-ETS)**

As a component of the Pre-ETS program, ORS collaborates with partners developed several Project Search programs within the health care industry and funded summer work experiences

for youth since 2010. Also, ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment, which are programs for work experiences for potentially eligible students with disabilities. These work experiences are in integrated community-based work settings at minimum wage or above. The Council strongly recommends including the numbers of individuals who received these services and the number that led to employment for the students in the State Plan data.

## **5. VI-VR(m) Order of Selection**

In the past, ORS was able to serve all eligible individuals. However, the need for services has grown along with the need to have better employment outcomes for eligible customers. This has resulted in ORS implementing an Order of Selection (OOS) and placing individuals on a wait list. The SRC has discussed many concerns with ORS regarding the implementation of the OOS including 1) how frequently customers will be notified regarding their Wait-List status; 2) will PRE-ETS services and transition services be impacted by the OOS and will the 15% obligation of funds for PRE-ETS be met; 3) will customers be directed to other options such as DLT, and whether these referrals will result in employment; and 4) how will the change in the number of supports needed to qualify for services impact the eligibility of customers for needed services.

The SRC is looking forward to working closely with ORS regarding the OOS per regulation 34 CFR 361.36. The Council will work to assist ORS in ensuring that re-evaluations of priority categories will take place and that the criteria used to determine who is eligible for services on the OOS will be disseminated clearly to customers and administered with transparency.

The SRC strongly urges ORS to develop and implement a viable method for providing customers with status updates that is more automated, real-time based, and maintains regular contact with customers who need the services. Additionally, the SRC encourages ORS to maintain the commitment to 15% of funding being applied to PRE-ETS programming per the requirements outlined in WIOA. Finally, the SRC urges ORS to collect data regarding the number of clients referred to DLT and the employment outcomes of these referrals, along with data tracking the number of customers who were deemed not eligible for services based on not meeting the criteria of three or more services needed.

The State Rehabilitation Council appreciates the opportunity to provide comments and feedback to the 2018 Two-Year Modifications for the Vocational Rehabilitation Services Portion of the WIOA Unified or Combined State Plan.

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

**ORS Response to Council's Input on State Plan Update:** ORS wants to thank the Rhode Island State Rehabilitation Council for reviewing the 2018 Two-Year Vocational Rehabilitation Services portion of the WIOA Combined State Plan Update, and for providing comments and formatting/grammatical edits to the descriptions. ORS has incorporated the formatting/grammatical edits as noted in the respective descriptions. ORS responses to those comments are listed below in the ORS response.

### **1. VI-VR(d) Coordination with Educational Officials**

ORS concurs with the SRC that provision of services to transition-age youth who meet eligibility is important and will continue to serve those currently receiving services. Additionally, students who apply and are determined eligible for individualized VR services, but placed in a closed priority group, may continue to receive Pre-Employment Transition Services (Pre-ETS) as long as those activities were started prior to being placed in a closed category. Of the 473 individuals on the wait list, 154 are identified as transition-age youth, of which 88 are receiving Pre-ETS services. There are 286 additional transition-age youth who are identified as Pre-ETS in services and who are reportable under WIOA, of which 120 have authorized services. When ORS is financially able to move individuals off the wait list, the Individualized Plan for Employment will be developed within 90 days.

## **2. VI-VR(i) Comprehensive System of Personnel Development**

ORS continues to value the benefits of having interns seeking their MA in Rehabilitation Services and will continue to reach out to institutions that provide MA in Rehabilitation Counseling.

ORS continues to require that all Vocational Rehabilitation Counselors (VRC) have an MA in Rehabilitation Counseling. While a Certified Rehabilitation Counselor certification (CRC) has never been a requirement of staff working for ORS, we do encourage and support staff in obtaining their CRC. Presently ORS has 32 VRC, Supervisors, and Administrators who are CRC certified. The Qualified Rehabilitation Counselor approval through the DLT Workers Compensation Unit enables an individual to accept cases from the DLT Workers Compensation Unit. ORS staff who choose to maintain the QRC, and accept cases from the DLT Workers Compensation Unit, do so independently of ORS.

ORS concurs with the SRC that continued staff development is important. To that end ORS continues to seek out training opportunities that meet the ongoing professional growth of agency staff, agency professional developmental needs, and the mission of the agency.

## **3. VI-VR(i)(6) Coordination of Personnel Development under the Individual with Disabilities Act**

ORS appreciates the support and feedback from the SRC related to the agencies Transition services, which includes Pre-Employment Transition Services. SRC concerns related to budget cuts and ability to serve individuals with hearing and/or visual impairments, as well as all individuals with disabilities who are eligible for VR services, is shared by ORS.

## **4. VI-VR(g) Coordination with Employers**

ORS concurs with the recommendation of including in description (g) Coordination with Employers, the numbers of individual who received services through the business partnerships ORS has developed with RI businesses. One of the business partnerships is in the initial phase of accepting referrals, so data is not available now. The other RI business has accepted 17 individuals, of which 9 completed the on-site training, with 8 becoming and maintaining competitive integrated employment.

ORS concurs that the duties of the Workforce Development Supervisor are important to our continued work as a WIOA partner; therefore, effective 2/4/18 ORS incorporated those duties with the Community Rehabilitation Program Supervisor duties. ORS sees this alignment as a

strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts.

### Marketing Outreach Strategies

ORS appreciates SRC interest and support of further developing marketing strategies to reach minority employers. ORS will keep SRC apprised of further developments in this area with Governor's Workforce Board and workforce partners. SRC recruitment of a Workforce Investment Board member to sit on the SRC is by ORS.

### Pre-Employment Transition Services (Pre-ETS)

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,262 identified Pre-ETS individuals.

## **5. VI-VR(m) Order of Selection**

ORS and the SRC continue to have discussions regarding the OOS changes, impact on individuals with disabilities seeking VR services, and the implementation and monitoring process. With the goal of ensuring transparency to individuals with disabilities seeking VR services and the Community Rehabilitation Programs, the SRC feedback, guidance, and support throughout the process has been appreciated by ORS.

ORS appreciates the feedback and guidance received from the SRC regarding the two-year state plan update.

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

Explanations, if applicable, are listed in ORS response section.

## **b. Request for Waiver of Statewideness**

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

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

N/A

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

N/A

### **3. All State plan requirements will apply**

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

N/A

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

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

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

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

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) expired in September 2015, but both agencies have agreed to an extension of the CA through 2018, as allowed by the original agreement. A new MOU for 2019 and beyond is in the process of development.

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

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

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

ORS 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.

ATAP, in conjunction with the ATAP Partners and State Independent Living Center (OSCIL), provides training to ORS Vocational Rehabilitation Counselors about assistive technology and the services of the program. The ATAP Partners also participate in the Assistive Technology Conference of New England, which is held each Fall.

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

ORS does not have such cooperative agreements at this time.

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

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

### **5. State use contracting programs.**

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

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

RI had four contracts that expired 6/30/16 with educational collaboratives to provide an array of transition services to in-school and out-of-school youth. These contracts were established to assist these programs that formally had long-term contracts with ORS to provide only vocational evaluations, and to build their capacity to provide more comprehensive services such as assessment, community-based work experiences, and summer work to youth. The educational collaboratives are now reliant on a fee-for-service model, as are all other ORS Community Rehabilitation Programs (CRPs).

In addition, ORS is the lead and implementing agency for the Assistive Technology Access Partnership (ATAP) program. The program is structured into contracts with deliverables, such as information and assistance, public awareness, device loans, device demonstrations, and device reutilizations.

The VR program also has a contract with the Sherlock Center of Rhode Island College to build Rhode Island's capacity of Certified Benefits Counselors for individuals receiving SSI and/or SSDI.

#### **d. Coordination with Education Officials**

Describe:

##### **1. DSU's plans**

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

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

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

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

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. This CA between ORS and RIDE expired September, 2015, but both agencies have agreed to an extension of the CA through 2018, as allowed by the original agreement. An updated MOU is in development. The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over 16 years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation Counselor at each high school to provide an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services in addition to the new WIOA Pre-Employment Transition Services.

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

career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

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

The referral to ORS from the LEA, with parental consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-Employment Transition Services (Pre-ETS). Under the auspices of the Cooperative Agreement, ORS is able to assist in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services and Pre-Employment Services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to prepare students for employment after high school. However, due to State fiscal concerns and budgetary matters, ORS has had to implement a more restrictive OOS, as of 12/19/2017; and as a result, a Wait List for services has been implemented. This has impacted Pre-ETS service delivery. Counselors will meet with potentially eligible students with disabilities to give them informed choice options. Still, the 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-Employment Transition Services Program is an expectation that all students who are found eligible Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility (Status 10) after coming off the Wait List, and updated as appropriate, and again prior to graduation.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for in-school youth is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training.

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

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

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

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the three state institutions of higher education: Community College of Rhode Island (CCRI), Rhode Island College (RIC), and the University of Rhode Island (URI). The MOU clarifies the role of each partner in fostering a seamless delivery system intended to support ORS customers attending post-secondary programs. It also defines the financial parameters for each partner in a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS.

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

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

RIDE has contracts with the Regional Educational Collaboratives to support transition, planning, and information about adult services within each high school. So each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Educational Collaboratives and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS (including information about potential Wait List).

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/Wait List, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible.

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

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

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

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience 120 days of trial work experiences prior to graduation. Therefore, ORS services 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 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

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

ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees 36 different state Local Education Authority (LEA) responsibilities for oversight over IDEA transition requirements, and transition activities. RIDE conducts periodic monitoring visits with each LEA. ORS counselors may sign up to be part of the RIDE school support visits.

Rhode Island Department of Education (RIDE) and ORS, in collaboration with Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), utilize and follow the Transition Timeline, which spells out each agency's roles and responsibilities (and at what age) for all transition-age youth and students with disabilities. It also lays out processes and services to be available at each juncture in transition. The Cooperative Agreement between ORS and RIDE does not entail any financial interchange or responsibilities. ORS is the lead agency in this CA.

**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/Wait List, and provide informed choice options, including whether to apply for services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility Category I.

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

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

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

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

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

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

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

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

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

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to in-school youth and obligates ORS to set aside 50% of SE grant for youth with significant disabilities age 14-24. ORS will be exploring how to integrate these SE services into the existing transition service delivery system.

In FFY2017, ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences. ORS sponsors and provides ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, and core values has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that sustain employment for individuals with significant disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP accepting responsibility to provide long term and intermittent support services to the individual with a disability. This shift in service delivery responsibility is well coordinated by the ORS counselor and CRP/long-term support provider so that there will be seamless access to the supports needed to sustain employment.

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

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and

benefits for its' supported employment population. A new service delivery model and fee structure was designed and implemented on 4/1/2013 and will be modified in FFY2017.

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

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

## **g. Coordination with Employers**

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

### **1. VR services; and**

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer clients paid, community-based, integrated work experiences consistent with client 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 client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities.

In addition, ORS partners with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS has identified two businesses, CVS and Alex and Ani, to partner with. The trainings, almost a boot camp model, provides two weeks of classroom work, followed by a third half week classroom and half week in employment setting, and nine weeks of paid work-based training within the actual business facilities. This prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but it is also producing a qualified



and specifically-trained pool of candidates for two nationally and internationally known businesses located in Rhode Island. One of the business partnerships is in the initial stage of accepting referrals, so no data is available at this time. The other RI business has accepted 17 individuals, of which 9 completed the on-site training with 8 becoming and maintaining competitive integrated employment.

The Workforce Development Supervisor has developed more than 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts the employer and job develops on the qualified job seeker's behalf. Upon the retirement of the Workforce Development Supervisor, ORS incorporated the duties with those of the Community Rehabilitation Program Supervisor. ORS sees this alignment as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts.

#### COMPREHENSIVE NEEDS ASSESSMENT:

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

#### MARKETING/OUTREACH STRATEGY:

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

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

#### PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The State emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search - 2014, was a success, and the program was replicated with Blue Cross in 2015, and an additional site in 2016 at Newport Hospital.

In addition, ORS funds summer work experiences for youth since 2010. 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 at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,262 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.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive a complete Benefit Analysis by a Benefits Counselor. ORS is working with 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.

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

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

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

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

ORS sponsors and participates in the Developmental Disabilities Supported Employment Advisory Council and Mental Health Supported Employment Council, for Developmental Disabilities, and has a representative on the Developmental Disabilities Council.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP. A Performance Based Supported Employment pilot began in 2017 and will end in mid-2018, and outcomes will be assessed. The objective of the SE services is in integrated competitive employment as an outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support.

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

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

#### **THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES:**

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

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are

also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

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

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health disabilities. Long-term supports are planned for and included in the customers' ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, RSA has established time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

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

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKri One-Stop Centers. ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI.

ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. 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 One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One Stop Staff.

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

RI has two Workforce Investment Boards (WIBs). Recently ORS became an active participant in the Disability Committee required by WIOA - both WIBs agreed to combine their Disability Sector Committee into one state-wide entity in order to maximize resource involvement.

Recent budgetary issues have resulted in ORS implementing a change in Order of Selection to a stricter eligibility standard as of December 19, 2017. This will result in increased collaboration and interaction with One-Stop Centers and DLT programming.

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

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

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

#### **A. Qualified Personnel Needs.**

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

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

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

#### **QUALIFIED PERSONNEL NEEDS:**

In FFY 2017, ORS provided services to approximately 3,985 individuals, with an average caseload of 92. ORS has a total of 94 full-time equivalent (FTE) positions, which includes 44 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 2017, 6 ORS staff retired or left the agency. Promotions resulted in vacancies in the following positions: VR Counselor I, VR Counselor II, Rehabilitation Counselor position, Human Services Business Officer, and Food Service Administrator. Already in FFY 2018, due to retirements and a promotion, the following positions are currently vacant: two Assistant Administrator positions, one VR Supervisor position, one VR Counselor I position, and one Senior Casework Supervisor. Over the next 3- to 5-year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

Vocational Rehabilitation Counselor I - 29

Vocational Rehabilitation Counselor II - 14

Supervisory - 11

Administrative - 7

Fiscal - 6

Case Aide - 3

Support Staff - 11

Social Services - 6

Direct Services - 4

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

Vocational Rehabilitation Counselor I - 1

Vocational Rehabilitation Counselor II - 1

Supervisory - 2

Administrative - 2

Fiscal - 0

Case Aide - 0

Support Staff - 0

Social Services - 1

Direct Services - 0

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

Vocational Rehabilitation Counselor I - 3

Vocational Rehabilitation Counselor II - 3

Supervisory - 2

Administrative - 1

Fiscal - 4

Case Aide - 1

Support Staff - 2

Social Services - 1

Direct Services - 1

## **B. Personnel Development**

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

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

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

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

As of 1/2018, there are 138 students enrolled in the graduate programs (83 at Assumption College and 55 at Salve Regina University) to obtain their MA in Rehabilitation Counseling..

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

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

Salve Regina University - 16 Graduates from previous year with a MA in Rehabilitation Counseling

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

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

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

## **3. Personnel Standards**

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

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

### **1. ADEQUATELY PREPARED AND TRAINED STAFF**

Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. The Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's Degree in Rehabilitation Counseling.

All new Vocational Rehabilitation Counselors are required to meet the standard of a Master's Degree in Rehabilitation Counseling from an accredited program.

ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a Master's Degree in Rehabilitation Counseling, and expects to be able to continue to meet this standard.

Through the practicum/internships, involvement on Advisory Boards, and speaking with students in MA Rehabilitation Counseling programs, ORS has worked aggressively with the institutions of higher education to recruit qualified individuals to fill vacancies.

ORS will continue to fill all fiscal and support staff vacancies with individuals who meet state requirements for education and experience.

ORS will continue to seek Commission on Rehabilitation Counselor (CRC) Certification Approval for training provided by ORS. Currently ORS has 32 VR Counselors, Supervisors, and Administrators who are CRC certified.

## **2. ANNUAL PERSONNEL NEEDS ASSESSMENTS**

The 2017 Comprehensive Needs Assessment indicated the following training needs: Workforce Innovation and Opportunity Act, Effective Time Management, and Motivational Interviewing.

The Training Coordinator of ORS elicited information from staff, to establish a list of training topics and concerns.

Top areas of training needs self-reported by VR Counselors, Supervisors and Administrators included: Supported Employment Training for VR Counselors and VR Vendors, Policy and Procedure updates, Physical Disabilities and relationship to employment, Ethics and Vocational Rehabilitation, Order of Selection and Eligibility Determination, Workforce Innovation and Opportunity Act in the area of data collection/electronic case management system, Pre-ETS, Supported Employment, etc.

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

Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc.

A training schedule is developed based upon the identified needs and will be implemented throughout the year. This year, ORS anticipates a focus on Order of Selection and Eligibility Determination and the Workforce Innovation and Opportunity Act.

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

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



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

ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan.

ORS is structuring mentoring activities around specific specialization areas in anticipation of future retirements.

All existing fiscal and support staff meet or exceed state requirements for education and experience

#### **4. Staff Development.**

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

##### **A. System of staff development**

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

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of areas identified for training included: Motivational Interviewing, Substance Abuse, Ethics in Rehabilitation Counseling, disability specific training, Cultural Diversity, Supported Employment, Ticket to Work, Relationship Building with the Business Community, Social Security Reimbursements, Employment Networks Partnership Plus, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors.

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

Management staff continues to include interested personnel in activities such as: assistive technology, transition, training, Community Rehabilitation Program (CRP) development, quality assurance, 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 is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements.

ORS sponsored 21 staff to attend the Annual Assistive Technology Conference in order to learn about new AT devices and services that are available. The 2017 conference had forty-four vendors available to provide information, as well as multiple presentations held over 2 days.

ORS has developed an Employment CADRE to function as Business Ambassadors, agency marketers, advocates, and educators to the business community. The Employment CADRE members also provided employment and labor information back to their regions at monthly regional meetings.

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

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

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

ORS will explore feasibility of working with Human Resources on how to develop a more formalized mechanism to document supervisory feedback and professional growth goals of staff.

ORS will enlist the Employment CADRE to assist with enhancing staff competencies in addressing the needs of business community.

## **B. Acquisition and dissemination of significant knowledge**

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

ORS will utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC)/Workforce Innovation Technical Assistance Center (WINTAC) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocation Rehabilitation services.

ORS has enlisted the Workforce Innovation Technical Assistance Center (WINTAC) to assist ORS in addressing the following WIOA requirements: (1) Establish performance measure data collection; (2) Establish relationship with DLT; and (3) Establish relationship with Business Community.

Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

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

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

Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. ORS has two Video Relay stations to enable communication in ASL between staff who are Deaf or Hard of Hearing, their colleagues, and customers. ORS utilizes a UBI Duo in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.

The 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.

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 Deaf and Hard of Hearing Region at ORS has developed and produced an ASL video that explains ORS services and is available on the ORS website.

Access to ORS information and services is provided through the use of the Language Line - The Big Word, interpreters from a variety of resources, and bilingual staff.

ORS brochures are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

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

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

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration, and service delivery planning between the VR Counselors assigned to the LEA, teachers, and special education staff.

ORS has about 30 Vocational Rehabilitation Counselors who have Transition responsibilities for providing services to in-school youth with disabilities, technical assistance to school personnel, and outreach to families.

On a monthly basis, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. At least annually, RIDE is invited to provide information about current and changing trends, regulations, and practices.

### **STATE REHABILITATION COUNCIL**

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

## **j. Statewide Assessment**

(Formerly known as Attachment 4.11(a)).

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

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

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

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, minorities with significant disabilities, underserved individuals, 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) will be initiating a CNA in FFY 2016/17 for the 2018 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

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

During FFY 2016/17, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

- Community Comprehensive Needs Assessment Survey
- Customer Satisfaction Survey
- Environmental Scan of Data including: Comprehensive System Improvement Plan, Department of Labor & Training data, Bureau of Labor Statistics, Disability employment statistics, US Department of Labor Bureau, US Census Bureau, RI Department of Education and the Office of Disability Employment Policy
- Rhode Island Governor's Commission on Disability Public Forums
- Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
- Focus group with key staff informants

The 2017 survey conducted by ORS and the SRC was sent to 492 individuals, which included CRPs, employers, ORS staff and ORS consumers. 155 individuals completed the survey which

represents a 31.5% return rate based on the 492. A broader range of the community, along with more individuals, received and answered the surveys, thus providing ORS with more information on the needs of individuals with disabilities.

The CRP survey yielded the following:

- When obtaining employment, social skills, fear of losing Social Security benefits, expectations from family and transportation are the most common challenges faced by individuals with disabilities.
- When maintaining employment, social skills, personal/home life barriers, transportation, expectations from family, fear of losing Social Security benefits and personal expectations are the most common challenges faced by individuals with disabilities.
- When obtaining employment for individuals, job availability, job matching, CRP time & resources, availability of retention & supports, insufficient job search preparation and availability of job development are the most frequent challenges faced by CRP's.
- When maintaining employment for individuals, job matching, CRP time & resources, insufficient job search preparation and availability of job retention & supports are the most frequent challenges faced by CRP's.
- Benefits counseling, long-term supports, case management, job coaching, work trial/internships/situational assessments and on-site job retention support are the most frequent challenges faced by CRP's.
- 58% of CRP respondents hold the credentials to provide supported employment services.

The Employer survey yielded the following:

- Giving individuals a fair chance and helping out the community was the primary motivation in employing people with disabilities.
- Communication and the ability to effectively provide accommodations were the largest challenges faced when hiring a person with a disability.
- Accommodations, reliability, performing the necessary job duties and adaptability were the largest concerns in hiring people with disabilities.
- Joy, helping, watching employee growth and gaining valuable employees were the largest rewards in hiring individuals with disabilities.

Respondents identified the following disabilities as least served by ORS:

- Substance Abuse Related Disorders
- Intellectual Developmental Disability
- Behavioral Health

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

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

Employers and consumers indicated that ORS could:

- Promote awareness of ORS
- Incorporate job postings on the ORS website that matches individuals to well-suited jobs.

## CUSTOMER SATISFACTION SURVEY

ORS maintained utilization of the Customer Satisfaction Surveys designed in 2012 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 with successful case closures, those whose cases closed unsuccessfully following receipt of services and those who are receiving some type of training provided by ORS.

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

Successful Closure Satisfaction Survey:

- More networking with employers and knowledge of labor market.
- More training opportunities.
- Strengthening timely communication between themselves and their ORS counselor.
- Physical location of CRP's.

## ENVIRONMENTAL SCAN

The environmental scan included information from a variety of sources such as: Comprehensive System Improvement Plan, 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, US Census Bureau, RI Department of Education, and Office of Disability Employment Policy. The sources indicated the following:

- Need for stronger coordination across Government and non-Government entities in the workforce system, including businesses.
- Need for better training opportunities.
- Need for more opportunities for job seekers to gain experience through internships and apprenticeships.
- RI was ranked 29th in the nation for employing people with disabilities; 34.3% of individuals with a disability in RI were employed; 76.3% of individuals without a disability in RI were employed; RI was ranked 36th in the nation in regard to employment gap between individuals with disabilities and individuals without disabilities.
- Since the last CNA, jobs in RI fluctuated: Professional & Business positions increased by 2,900; accommodation & Food Service increased by 1,600; Entertainment & Recreation increased by 200; Information jobs were unchanged; Manufacturing, Retail, Transportation and Educational Service all showed a slight decrease; Government employment decreased by 500; Health Care & Social Assistance decreased by 1,000; Construction decreased by 1,800.
- Nationally: 17% of individuals with disabilities were employed; 64.6% of individuals without a disability were employed; Unemployment rate for individuals with a disability was 12.5%; Unemployment rate for individuals without a disability was 5.9%.

- Disability in the National Workforce: 18.2% worked in the service fields (excluding protective service); 15% worked in Administrative support; 10.4% worked in Sales; 9% worked in Management, Business and Finance.
- 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

Behavioral Health/Emotional Impairments, Cognitive Impairments, Physical Disabilities, Intellectual/Developmental Disabilities and Substance Abuse disorders comprised the majority of ORS caseloads.

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

Workforce Innovation & Opportunity Act (WIOA)

Motivational Interviewing.

Effective time management.

Needs of Individuals with Most Significant/Significant Disabilities and Supported Employment Services:

- Increase 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 CRPs who work with individuals with Developmental Disabilities 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 personnel to provide a continuum of services.

**B. who are minorities;**

**Rehabilitation Needs of 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 Underserved and Unserved Populations
- Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
- Incorporate access to services for individuals who are not English-speaking.
- 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 2017 identified the following as the most unserved/underserved populations served by the VR program:

- Physical Disabilities
- Intellectual and Development Disabilities
- Behavioral Health
- Mental Health

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

The Comprehensive Needs Assessment (CNA) conducted in 2017 did not identify unserved populations for that component. However, surveys from ORS staff identified that the following areas needed to improve services:

- Prepare consumers for emerging employment driven by employer needs
- ORS should be an active partner with the DLT and the employment community to promote access to employment for individuals with disabilities
- There is difficulty in gaining access to the statewide workforce development system
- High level of difficulty in knowing which programs and services are the best for consumers

**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 2017 Comprehensive Needs Assessment (CNA) identified that students with 504 plans are underserved.

There were 8,400 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.

“At-risk” students with learning disabilities 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 (and their parents) indicated they are unaware of the full scope of services available to them, and had difficulty understanding written materials provided by ORS.



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

Need to further remove the following barriers in order to strengthen the quality of services from CRPs:

- Transportation barriers, maintaining staff, access to benefits counseling and community based job availability were challenges to delivering services and employment outcome
- Fear of losing Social Security benefits, medical coverage, family expectations, individual expectations, 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.
- Assess CRPs' ability to work with varying populations and disabilities.

Meeting the needs of the Business Community:

- Increase marketing and awareness of ORS services.
- Enhance presence at business expos and job fairs
- Provide Business Community with information on ADA and work place accommodations

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

Develop materials about ORS that are easier to comprehend for both students and parents

Consider strategies on how to better connect to “at-risk” students outside of the schools, as students report feeling stigmatized

Expand outreach to other programs, such as youth centers, family resource centers, and career & education programs

Strengthen connections to higher education, particularly disability support service coordinators, to increase access to underserved youth and students with disabilities

Assist schools in increasing communication and coordination for “at-risk” youth and students with disabilities

## **k. Annual Estimates**

Describe:

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

For FFY 2017, there were 2,173 new applicants, and 1,730 individuals were deemed eligible. There was a total of 1,591 individuals who developed their Individualized Plan for Employment (IPE), and 703 individuals who obtained successful employment outcomes.

For FFY 2018, ORS has a goal of 2,174 new applicants, and expects 1,731 individuals to become eligible. ORS anticipates that 1,559 new Individualized Plans for Employment will be developed, and 652 successful outcomes achieved.

For FFY 2019, ORS projects 2,175 new applicants, with 1,732 individuals to become eligible for ORS services. ORS anticipates that 1,560 individuals will develop Individualized Plans for Employment, and projects 653 successful outcomes.

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

### **A. The VR Program;**

As of 1/30/18, ORS has 4,269 active clients. This number includes 877 Pre-ETS students Category I and II and 214 are Non-Applicant Pre-ETS students; 2,788 Category I and II clients in different service statuses; 390 clients on the Wait List of which 336 are Category I, 51 are Category II clients, and 3 are Category III clients.

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

As of 12/19/17 all OOS Categories I, II, and III were closed. As money and staff resources become available, individuals will be taken from the Category I Wait List by date of application. During the months of October, November, and December 2017, ORS admitted 298 more clients in Category I to active status. It is not anticipated that clients in Category I on the Wait List will be moved into services during FFY 2018.

OOS Category I - 3,318

OOS Category II - 18

OOS Category III - 0

Maintain Employment - 0

Total - 3,396

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

In FFY 2019, the projected number of Title VI to be served under an IPE is 687

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

OOS Category I - Title VI: 677

OOS Category II - Title VI: 0

OOS Category III - Title I: 0

In FFY 17, ORS provided services to 12 individuals waived from the OOS Wait List due to employment status need.

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the wait list and in Category I needs

to be the top priority. ORS will revisit this through an amendment if additional funding becomes available and ORS is able to open Category I.

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

As of 1/26/18 the OOS Wait List is 388. Of this number, 335 are OOS Category I, 50 are OOS Category II, and 3 are OOS Category III. Each month, ORS averages 200 Category I admissions and 20 Category II admissions, so 220 clients will be admitted to the Wait List for each month of FFY 2018. It is anticipated that by 10/30/18, 2,640 clients will be on the Wait List. It is not anticipated that clients in Category I on the Wait List will be moved into services during FFY 2018. ORS will monitor funding and staff resources quarterly for availability to move clients in Category I off the Wait List based on date of application.

**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: \$5,600,784.00

$\$1,687.91 \times 3,318 = \$5,600,784.00$

**I. State Goals and Priorities**

The designated State unit must:

**1. Identify if the goals and priorities were jointly developed**

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

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

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

**GOALS FOR FFY2018**

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

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

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

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

- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to devote 7% of grant to partnership with ORS and target individuals with disabilities in Request for Proposal (RFP) requirements
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)
- Explore opportunities with all State Partners for braiding and blending of funding for service delivery.
- Explore options under Science, Technology, Engineering and Math (STEM) for business sectors.

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

- Implement and coordinate Project Search sites already in process and new one in development for adults with IDD. Utilize Viability, a current ORS vendor, to coordinate the two Business/ORS training-employer partnerships.
- Partner with an emerging, high wage business sector

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

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

- In-School Youth with Disabilities: enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are identified.

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

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis and will provide documentation to DOJ court monitor.
- Implement training opportunities for SE vendors in assessment, job development, and coaching.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
- 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.

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

- Replicate the Continuous Quality Improvement (CQI) process for training and rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

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

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

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

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

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

## OBJECTIVE 3: Monitoring Wait List

- Provide weekly updates to Administration and Office of Health and Human Services (OHSS) to identify Wait List number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
- Maintain and update ORS website to report on Wait List size by Category and develop process for reporting an individual's placement on Wait List
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on Wait List
- Continue to monitor Wait List on a quarterly basis

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

Goals and priorities established were based on results of 2017 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.

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

Goals and priorities established were based on results of 2017 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.

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

ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the common WIOA performance measures and RSA standards of practice as evidenced by agency ability to meet reporting and status change expectations of RSA. In order to meet this goal, ORS plans to continue to participate on the RI DOA common performance measures committee, to determine the "what and how" of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.

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

ORS will continue the past practices of providing Performance Measure Indicators to OHHS.

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

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

Third priority will be given to other eligible consumers who have a disability that seriously limits one 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 began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I , and will continue to assign to the Wait List eligible clients who meet criteria for Category II or Category III.

For FFY 2018 through FFY 2019, ORS will serve individuals with the most significant disabilities Priority Category I first and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the Wait List and in Category I needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available, and ORS is able to open Category I.

### **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 impeding the Agency's ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection.

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

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

Projections for numbers to be served in FFY 2019 are based on the current census. These numbers reflect those currently being served or projected to be served prior to the closure of Category I. All categories will be closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible, but have not begun to receive services under an IPE.

#### Order of Selection (OOS):

OOS Category I: 3,318

OOS Category II: 18

Maintain Employment Clients: 0

The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual's informed career choice that has evolved from information about skills, interests, preferences, abilities, and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the



specific services/interventions needed by the individual to reach that employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal.

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

Quantifying the length of time an individual is active with ORS is difficult as the necessary services, duration, and outcome is individualized to the needs of each customer. Projections based on recent performance:

Priority Category I - 36 Months Priority Category II - 13 Months Maintain Employment Clients- N/A

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

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 will take individuals off the Category I Wait List as funds are available for services by date of application. ORS does not anticipate opening the Wait List for any category during FFY 2018.

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

One exemption to placement on the Wait List follows:

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

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

No. ORS and the SRC continue to have discussions at the SRC meetings regarding Order of Selection changes, impact and implementation. The SRC has 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.

ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I, and will continue to assign to the Wait List, eligible clients who meet criteria for Category II or Category III.

For FFY 2018 through FFY 2019, ORS will serve individuals with the most significant disabilities Priority Category I first, and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services, and who are currently employed and at risk of job loss due their disability, and who could benefit from VR services to maintain employment. ORS believes consumers who are on the Wait List and in Category I needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available, and ORS is able to open Category I.

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

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

#### **STATE'S GOALS AND PLANS FOR TITLE VI FUNDS**

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

#### **GOALS FOR FFY 2018 TITLE VI**

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

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

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

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

- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to include a requirement in RFPs that devotes 7% of grants to a partnership with ORS and targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)

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

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

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

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

- In-School Youth with Disabilities: enhance the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.
- Adults with Disabilities: ensure a wide array of service providers and training programs 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.

- Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis.
- Implement training opportunities for SE vendors in assessment, job development, and job coaching.

- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practices.
- Support and participate in the SE Developmental Disability (DD) and SE Behavioral Health (BH) vendor meetings.
- 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.

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

- Replicate the Continuous Quality Improvement (CQI) process for training and rehabilitation services vendors.
- Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
- Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
- Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

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

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

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

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

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

**OBJECTIVE 3:** Monitoring Wait List

- Provide weekly updates to Administration and Office of Health and Human Services to identify wait list number broken down by Category and Consent Decree population
- Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization.
- Maintain and update ORS website to report on Wait List size by Category, and develop process for reporting an individual's placement on waitlist
- Develop process for fiscal forecasting monitoring
- Identify other WIOA partners and resources for persons applying for services and placed on wait list.

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

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

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

Youth In-School in need of SE Services:

- Enhance the Transition program and service options within each high school to coordinate and deliver Transition that provide services and work experiences to youth and students with disabilities in order to reach a competitive integrated employment outcome.
- Implement Project Search, targeting in-school youth and students with disabilities with the most significant disabilities, at three sites.
- Increase the number of Summer Work experiences.
- Refine the Vocational Evaluation service to utilize discovery principles and career exploration opportunities.
- Develop the capacity and process for providing Job Coach supports for community-based work experiences.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis, despite RSA's recent rescinding funding of Title VI grant monies.

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.
- 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, despite RSA recent rescinding Title VI grant monies.

**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 braid funding to support the provision of SE services as part of Transition and Pre-ETS.

Establish increased knowledge about each state agency's responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community.

Maximize existing youth resources, such as DLT Youth Centers.

**o. State's Strategies**

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

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

The goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title VI Funds will be realized through the following strategies:**METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES:**

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

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

- ORS will enlist its partners to identify local businesses to develop targeted training programs to meet the specific needs of local business sectors.

- ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), Common Performance Measures Task Group, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS will advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources.
- ORS will encourage WIOA partners to include an RFP requirement that 7% of grants must be devoted to partnership with ORS and target individuals with disabilities.
- Several successful business partnerships, Project Search, and Viability will continue to be supported by ORS.

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

- ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success.
- Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, incorporating work experiences into employment plan development will increase the client's ability to make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors.
- Participation in employment experiences for individuals needing Supported Employment, in-school youth, and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE).
- ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage.
- ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery Principles and Practices into service delivery in order to increase expectations that individuals with significant intellectual and 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 continue to update its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development.
- Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will expand their communication through social media outlets. In addition, orientation groups, literature distribution about the agency, presence at the netWORKri One-Stop Centers, and participation in resource education events around the state will enhance referrals and visibility.

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

The DOJ/State Consent Decree requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot, and modify the process for CQI review of CRPs. The DOJ Consent Decree CQI efforts continue to be a strong point of emphasis.

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

Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes.

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

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

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

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

ORS identified needs of minority population 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 over 16 years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services not subject to Order of Selection (OOS) will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 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 in-school youth 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, provides an orientation to Special Education staff at each Rhode Island High School. Transition and Pre-ETS services include: Counseling & Guidance, Vocational Evaluations and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any work activities already completed by the LEA such as volunteer positions, work tryouts, and internships provide valuable information to the discussion and planning process. These activities are considered trial-work experiences, so are important to vocational planning.

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

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

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

The Continuous Quality Improvement Committee works with the CRP Supervisor to develop increased options for individuals with disabilities who are considered underserved and/or minority populations based on the CNA findings. In addition, ongoing Quality Improvement activities such as the quarterly satisfaction survey are developed and implemented by the SRC

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

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.

ORS will utilize the information from the FFY 2017 Statewide Comprehensive Needs Assessment (CNA) as a foundation for expansion and/or development of new fee-for-service agreements that meet the employment needs of customers.

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

ORS is participating on a RI Department of Administration (DOA) Performance Measure Committee that is part of the Governor's system-change efforts. The Committee is examining methods to gather and track employment outcomes, educational, and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.

In addition, monthly monitoring of timeline requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applications, and successful employment outcomes. This year will provide an opportunity to gather baseline performance information that will provide the basis for improvement strategies moving forward.

ORS will seek guidance from the RSA to establish 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 Workforce Development Supervisor/Community Rehabilitation Program Supervisor interacts with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women's Business Enterprise (WBE), and Minority Business Enterprise (MBE) trade organizations. The Department of Human Services (DHS) will be represented on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Sub-committee. ORS staff review RFPs of Rhode Island's two Workforce Investment Boards, Youth Councils, and Youth Centers; and 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 netWORKri One-Stop Centers. ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston One-Stop Career Center/netWORKri.

ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. 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 One-Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One-Stop Staff.

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

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

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

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

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

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 assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan.

ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS' collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services.

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

## **B. support innovation and expansion activities; and**

ORS will utilize Innovation and Expansion (I & E) funds during FFY 2018 to support the activities of the SRC. The SRC and ORS will conduct a state-wide Comprehensive Needs Assessment, as required by RSA in FFY 2020. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing reports from the Governor's Workforce Board, the results of the Governor's Commission on Disabilities, as well as DLT reports to frame and structure the CNA.

ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Such efforts as Project Search, business based training, and expansion of OJT will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes funding will be encouraged.

I&E funds will be used to generate a service-delivery response that increases the number of minority and underserved populations who participate in services, stay engaged, and who obtain quality employment outcomes.

ORS will use I&E funds to cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Asperger's and Autism, and individuals with sensory impairments

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

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

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

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

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

Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.

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

Describe:

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

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

**STATE PLAN FOR VR TITLE I FFY 2016 AND FFY 2017:**

The State Plan for FFY 2016 and FFY 2017 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 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, performance-based supported employment programming, and expanded training programs had been developed in response to the data analysis, Comprehensive 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. This process enabled ORS to continue to meet 60-day eligibility and 90-day plan development requirements.

Several of the other initiatives included: development of three Project Search sites in collaboration with three local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), and Local Education Authorities (LEAs); a partnership with two 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.

**ACTUAL EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:**

FFY 2016 - Successful Closures 651

FFY 2017 - Successful Closures 703

Variance - Successful Closures 52

Successful Transition Closures for FFY 2016 and 2017 -60

Successful Minority/Underserved was 200

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

Obstacles for FFY 2016 and FFY 2017 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.

**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 2016 and FFY 2017:**

The State Plan for FFY 2016 and FFY 2017 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

- CRP Supervisor and ORS staff continued work with Alex and Ani for a “boot camp” style training program leading to competitive integrated employment.
- A second business was developed with this model for CVS and is in process.
- ORS began discussion utilizing current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with IDD and Autism/Asperger’s via a collaboration with BHDDH and DLT Real Jobs RI initiative. The site in development is RI Hospital, as part of the Lifespan Network.

**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 an internal Employment Cadre, headed by the Workforce Development Supervisor consisting of VR Counselors, to address employment and job development needs of the agency as a whole.
- As of December 2017, the MOU’s have been updated for the Providence Cranston and Greater RI Workforce Boards, and ORS met with the System Director of The Work Place, the One-Stop System Operator for both boards. ORS identified a liaison to facilitate dissemination of information about business sector needs to agency staff. As the MOUs of each partner are implemented, ORS anticipates further opportunity to engage in discussions on Request for Proposals (RFPs), and On-the-Job Training processes and methodology.
- ORS maintains a daily presence at the One-Stop Centers, which provides the foundation for a cohesive service delivery system to ORS customers. Recent ORS staff retirements have resulted in ORS identifying new staff liaisons to the various advisory groups.

- The ORS Workforce Supervisor 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:

- Two ORS Vocational Rehabilitation Counselor IIs presented with the Providence School Department and The Miriam Hospital at the 2017 Project Search Conference held in Pennsylvania. Additionally, Project Search data was presented at the 2017 Rhode Island College Transition Institute and Conference for Special Education Directors at Northern RI Collaborative. Several VRCs presented “What Teachers Need to Know” at the 2016 Rhode Island College Transition Institute.
- In expanding Project Search from two to three sites, ORS has total of three sites presently, Miriam Hospital, Blue Cross Blue Shield RI, and Newport Hospital. ORS continues to enlist Viability, a current ORS vendor, to develop an additional Business/ORS training-employer partnership; CVS was identified. CRP Supervisor and Regional Supervisor identified VR Counselors liaison to begin development of referral process and program start. ORS has and will continue to explore partnering with emerging high wage business sectors.

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

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

In-School Youth with Disabilities:

- 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 2017 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.

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 2017 and identified trends and needs of Adults, and identified areas of need, such as services for individuals with Autism/Asperger's to design programs and services.

**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 evaluated seven providers presently and will continue to collaborate with BHDDH to review at least six agencies per year.
- ORS implemented training opportunities for SE vendors in assessment, job development, and job coaching.
- ORS has identified training needs for providers, as a result of CQI reviews, such as fading strategies and identifying employment goals.
- ORS continued to conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- ORS continued 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 developed and implemented a pilot with seven Developmental Disability providers for a performance-based supported employment program with focus on employment and increased staff capacity.

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

- Replicated the Continuous Quality Improvement process for training and rehabilitation services vendors. The model developed from Developmental Disabilities provider QI reviews has been utilized, and can be replicated for reviews with other service providers.
- 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 QI Plan with provider.
- As part of the Consent Decree, ORS collaborated with other State Agencies, as part of the State Training Committee, focused on approving curricula for training to DD providers. This purpose for this training was to increase skill level and knowledge base of provider staff supporting individuals with disabilities. One curriculum under consideration increased in a 93% Certified Employment Support Professional (CESP) passing rate.

**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 RI Department of Administration (DOA) Common Performance Measures Committee. 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.
- Upon readiness of the agency electronic case management system, ORS began collecting WIOA performance measures as defined by RSA in July 2017.
- ORS has held several large staff trainings focused on the WIOA reporting requirements. Supervisory training has been provided on the new requirements and entry into the ECM system, guidance documents have been developed, revised as needed and disseminated to staff. Training will continue to be provided 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 still tracks and monitors monthly the 60-day eligibility and 90-day to individualized plan for employment compliance. Regional Supervisors review this data with counselors to determine obstacles towards compliance.

Accomplishments:

- The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long-standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued financial support by other state agencies of sheltered workshops impeded resources being re-directed to employment and long-term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding, and collaboration among state agencies.
- In the interest of overcoming some of these obstacles, ORS developed and implemented a pilot in 2017 with seven Developmental Disabilities providers for a performance-based supported employment program with focus on employment and increased staff capacity.
- 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 recently begun the second phase.
- 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.

**STATE PLAN FOR Title VI FFY 2017:**

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

FFY 2016 Successful Supported Employment Closures 113

FFY 2017 Successful Supported Employment Closures 129

Successful Minority and Underserved Closures 36

Variance

Successful Supported Employment Closures 16

Successful Minority and Underserved Closures 18

**B. Describe the 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 2016 and FFY 2017:**

Obstacles:

- The obstacles for Title VI program for FFY 2016 and FFY 2017 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.
- 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.

**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. It is anticipated ORS will have the ability to report on the new indicators in the next State Plan update.

During FFY 2016 and FFY 2017, ORS monitored the number of new applicants, number of new IPEs that were written, and number of competitive integrated employment outcomes achieved.

In FFY 2016 there were 2,383 new applicants for services; 1,598 new IPEs developed; and 651 employment outcomes.

In FFY 2017 there were 2,173 new applicants; 1,591 new IPEs developed; and 703 employment outcomes.

In the first quarter of FFY 2018, ORS had 563 new applicants; 265 new IPEs; and 210 individuals obtained employment.

In FFY 2016 ORS met Standard 1 and 2.

For FFY 2016 ORS again met Standard 1 with positive outcomes for Performance Indicators 1.1, 1.2, 1.3, 1.4 and 1.6 and met standard 2.1.

ORS maintained a focus on increasing quality employment outcomes as per the CNA, Strategic Plan, and RSA 107 monitoring report. In September of 2016, R.I. along with one other state had the 8th highest unemployment rate in the nation at 5.6%. While Indicator 1.5 was not met, improvement was noted for the third consecutive year with an average hourly wage of \$12.15 for FFY 2016. This represents an increase from the FFY 2015 hourly wage of \$12.05.

FFY 2016, ORS met RSA Standard I - VR's impact on employment and Standard II - Minority Service Rate.

Performance Indicator 1.1: In FFY 2016, ORS achieved 651 successful employment outcomes. This is an increase from the FFY2015s 643 successful employment outcomes.

Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate in FFY 2016 with 61.6%. The 61.6% was a decrease from the FFY2015 rehabilitation rate of 69.2%.

Performance Indicator 1.3: ORS exceeded the Federal Standard earnings ratio of 72.6% in FFY 2016 with a rate of 99.8%, which represents an increase from FFY 2015 rate of 99.7%

Performance Indicator 1.4: ORS exceeded the Federal Standard of 62.40%, with a rate of 100% for both FFY 2016 FFY 2015.

Performance Indicator 1.5: In FFY 2016 ORS continued to face challenges in meeting this indicator in part due to the RI economy and did not meet the Federal Standard of .52%. An additional challenge is the Bureau of Labor Statistics (BLS) data runs about three quarters behind, which impacts the ability to accurately calculate and monitor progress toward this goal.

Performance Indicator 1.6: ORS continued to exceed the federal standard of .53%. The number of individuals whose own income at the time of exit from services was their largest source of support was 62% in FFY 2016. This result represents a decrease from FFY 2015 rate of 64.3%

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

Performance Indicator 2.1: ORS met the standard of .80% for services and employment outcomes for minorities who are disabled for FFY 2016 with a rate of .85%. This also represents an increase from the FFY 2015 with a rate of .84%.

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

I & E funds were used to support the Dare to Dream conference attended by ORS Transition Counselors, Transition-Age Students (573 participants ranging from 9th grade to post-high school youth), and Teachers

ORS utilized I & E funds to support the contract with the Paul V. Sherlock Center on Disabilities

#### **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, and the RI Transition Council.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting customers' individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support/vendor who will continue to provide support services to the individual with disability on a long-term basis. These long-term support providers are identified in a signed agreement of understanding, which is signed by the vendor agency and ORS.

In 2017, ORS developed a performance-based service agreement with seven DD providers that tied quarterly payments to services leading to community-based integrated employment with a provision that dedicated employment teams be assigned towards that end. An additional performance-based feature tied an incentive bonus for an individual attaining a placement for at least 20 hours per week. The year-long pilot will be ending by May 2018, and outcomes will be assessed.

##### **SUPPORTED EMPLOYMENT SERVICE DELIVERY:**

ORS has employment services that are available to adults and in-school youth found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. 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. Although usage of workshop settings has markedly decreased since the initiation of the Consent Decree, other funding streams continue to direct resources to segregated workshops and day programs. Staff resources were therefore unavailable to support integrated competitive employment efforts for adults and transition-age youth with significant behavioral health and developmental disabilities. 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 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 extended a Cooperative Agreement with RIDE and is in process of working on a new one. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 17 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 Transition Services and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Vocational Evaluations and Assessments; Community-Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences, Summer Work, Project Search, and other Pre-ETS transition and work activities. The array of ORS transition services in place for both in-school youth with disabilities and those youth eligible for Supported Employment services meet the requirements of WIOA and the DOJ/State Consent Decree. In 2017, ORS developed a performance based service agreement with seven DD providers that tied quarterly payments to services leading to community-based integrated employment with a proviso that dedicated employment teams be assigned towards that end. An additional performance-based feature tied an incentive bonus for an individual attaining a placement for at least 20 hours per week. The yearlong pilot will be ending by May 2018; outcomes are being assessed, but initial hopes of increased provider staff capacity did not materialize.

### **SUPPORTED EMPLOYMENT AGENCY NETWORK:**

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities and

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

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

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

ORS has taken the lead on identifying and establishing qualifications for employees of mental health agencies and developmental disability agencies to ensure that staff have the expertise appropriate for the vocational services being provided to ORS clients. ORS has been working with the Sherlock Center for Disabilities and VocWorks in order to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment. The CRP Supervisor actively meets with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. The CRP Supervisor, in collaboration with field supervisors, counselors, and ORS administrators, is actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported

Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its' supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

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

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

The IPE also identifies that the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the extended supports provided solely by the CRP is defined by RSA, despite the recent elimination of funding of this years' Title VI Supported Employment grant.

## **Certifications**

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

Name of designated State agency **Office of Rehabilitation Services**

Full Name of Authorized Representative: **Ronald Racine**

Title of Authorized Representative: **Associate Director**

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

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act.\*\* Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section



111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

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

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

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

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

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

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

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

## Footnotes

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### Certification 1 Footnotes

\* Public Law 113-128.

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

### Certification 2 Footnotes

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

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

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

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

### **Certification 3 Footnotes**

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

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

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

#### **Certification Regarding Lobbying — Vocational Rehabilitation**

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

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

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

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

#### **Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that:  
If any funds have been paid or will be paid to any person for influencing or attempting to

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

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

Full Name of Authorized Representative: **Ronald J. Racine**

Title of Authorized Representative: **Associate Director**

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

### **Certification Regarding Lobbying — Supported Employment**

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

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

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

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### **Statement for Loan Guarantees and Loan Insurance**

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

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

Full Name of Authorized Representative: **Ronald J. Racine**

Title of Authorized Representative: **Associate Director**

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

## **Assurances**

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

### **1. Public Comment on Policies and Procedures:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Agency will provide the full range of services described above      **Yes**

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

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

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

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

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

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

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

**i. has developed and will implement,**

**A. strategies to address the needs identified in the assessments; and**

**B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and**

**ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).**

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

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

## **6. Financial Administration of the Supported Employment Program:**

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

## **7. Provision of Supported Employment Services:**

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

**in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the  
Rehabilitation Act.**

**Additional Comments on the Assurances from the State**