

## VOCATIONAL REHABILITATION

### Program-Specific Requirements for State Vocational Rehabilitation Services Program

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

#### (a) State Rehabilitation Council.

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

☐ (A) is an independent State commission.

☒ (B) has established a State Rehabilitation Council.

**In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.**

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2 <sup>nd</sup> Term	07/12/2023
Parent Training & Information Center	2 <sup>nd</sup> Term	10/11/2022
Client Assistance Program	2 <sup>nd</sup> Term (no term limit)	07/12/2022
Qualified VR Counselor (Ex-Officio if Employed by the VR Agency)	2 <sup>nd</sup> Term	07/12/2025

Community Rehabilitation Program (CRP) Service Provider	2 <sup>nd</sup> Term	11/08/2024
Community Rehabilitation Program (CRP) Service Provider	1 <sup>st</sup> Term	07/12/2024
Business, Industry & Labor	2 <sup>nd</sup> Term	07/12/2023
Business, Industry & Labor	1 <sup>st</sup> Term	07/12/2023
Business, Industry & Labor	2 <sup>nd</sup> Term	07/12/2025
Business, Industry & Labor	Vacant	N/A
Disability Advocacy Groups (Sensory Disabilities)	2 <sup>nd</sup> Term	07/12/2023
Disability Advocacy Groups (Veteran)	1 <sup>st</sup> Term	07/12/2024
Disability Advocacy Groups (General Advocacy)	2 <sup>nd</sup> Term	07/12/2024
Disability Advocacy Groups (Cognitive Disabilities)	2 <sup>nd</sup> Term	07/12/2025
Current or Former Applicants for, or Recipients of, VR Services	2 <sup>nd</sup> Term	07/12/2023
Section 121 (AIVRS) Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	Vacant (awaiting appointment submitted May 2025)	

State Workforce Development Board (WDB)	1 <sup>st</sup> Term	07/12/2023
VR Agency Director (Ex Officio)	1 <sup>st</sup> Term	N/A

**If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.**

The PA Rehabilitation Council (PaRC) does not currently have a representative from the State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individual with disabilities education Act (IDEA); however, an individual has been identified to represent them on the PaRC. PaRC submitted an appointment application in May 2025, and it is awaiting review by the Secretary of Labor & Industry and the Governor's Office for appointment.

The PaRC is also actively seeking a fourth representative for Business, Industry & Labor to replace the member whose term limit expired 07/12/2025. The PA SRC advertises vacancy recruitments on social media and their website, as well as through individual advocacy and networking. The PA SRC's nomination/appointment process is multi-step and requires quorum at any meetings that involve votes on nominations. Their Governance Committee, which meets monthly, reviews membership applications and votes to approve or reject the application. If approved, the applications go before the Full Council, which meets quarterly, for a vote to approve or reject the nomination. When approved, the nomination comes before the OVR Executive Director who escalates it to the Secretary of Labor & Industry for approval. Finally, it is escalated to the Governor's Office for review and appointment.

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

The PaRC used the following sources to develop its recommendations to the PA Office of Vocational Rehabilitation (OVR):

1. PaRC Annual Report (State Fiscal Year [FY] 2021-2022) and [FY 2023-2024}
2. Review of items in the 2024 State Plan Attachment (Description A)

3. Comments received at 2022/2023 State Plan Meetings
4. Comprehensive Statewide Needs Assessment (CSNA) Program Years (PY) 2019-2022 OVR/Institute on Disabilities at Temple University
5. Local Citizen Advisory Committees (CAC) meetings and/or minutes
6. Quarterly reports received from OVR at PaRC Full Council meetings

**Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.**

**Commendation:** The Council commends the PA Client Assistance Program for their continuing support of customers seeking appropriate services from the Office of Vocational Rehabilitation.

**Recommendations:**

**1. Empower Individuals paid subminimum wages through 14(c) Waivers to obtain CIE.**

**Issue:** Many individuals who are paid subminimum wages through employers that hold certificates issued under section 14(c) of the Fair Labor Standards Act have stated a desire to receive the supports necessary to move into CIE. Potential barriers may include lack of contacts available outside of the workshops for families and individuals, communication between workshops and families, family resistance or decisions being made by families on behalf of individuals, individuals determined in-eligible for services, and a lack of benefits counseling during initial contact with providers.

**Recommendations/Measurable goals:**

1. Expedite the Integrated Vocational Engagement & Support Team (InVEST) Project to assist individuals with disabilities, families, and community businesses with CIE engagement, supports and services/resource coordination.

**OVR Response:** OVR accepts this recommendation. Year One and Year Two are completed and Year Three is underway.

2. Upon availability, OVR shares reports and data identifying the main cause of individuals remaining in 14(c) workshops.

**OVR Response:** OVR rejects this recommendation. Currently, there is no report as to why individuals choose to remain in 14(c) facilities; however, our Section 511 VR Specialists continue to conduct informational presentations to those individuals within the 14(c) facilities and complete applications for those interested in OVR services.

3. It is imperative that people with disabilities are: 1) included in the process of identifying how these barriers are removed, and; 2) provided creative solutions/presentations from people with full professional and lived experiences to ensure better outcomes for participants.

**OVR Response:** OVR accepts this recommendation. Our Section 511 VR Specialists will continue to provide information on how a person in a 14(c) facility can transition to CIE. They will also provide referrals to District Offices for any person interested in CIE. Through InVEST Project, OVR is running advisory committees and will use the feedback to implement further strategies to help Customers in 14(c) facilities exit to CIE.

## **2. Leverage resources, heighten understanding, and provide additional staff trainings in OVR District Offices to better serve Customers with mental health needs**

**Issue:** According to the findings listed in the CSNA, people with mental health needs have been identified as one of the most underserved communities in the Commonwealth of Pennsylvania (PA) because, “many individuals with mental health needs do not recognize themselves as part of the disability community and understand that they can access VR services. This lack of understanding coupled with stigma results in individuals not getting access to necessary accommodations. There is also a lack of training and funding for providers to support individuals with mental health needs.”

### **Recommendations/Measurable Goals:**

1. All OVR District Offices will collaborate with local mental health providers and obtain resources within their region to:
  - a. Provide necessary accommodations for people with mental health needs seeking VR services.
  - b. Perform community outreach and inform people with mental health needs about their rights to VR services.
  - c. Provide training, information, and resources to OVR counselors, staff, and VR providers to help identify behaviors that may exhibit the need for mental health services.

**OVR Response:** OVR accepts this recommendation. OVR will continue to provide outreach and onboard new providers to enhance services to those with mental health disorders. OVR will make training available to all staff through in-service trainings and outsource trainings as appropriate and collaborate with the PA Office of Mental Health & Substance Abuse Services (OMHSAS) and local mental health providers.

## **3. Strengthen Collaboration between Bureau of Vocational Rehabilitation Services (BVRs) and Bureau of Blindness and Visual Services (BBVS)**

**Issue:** VR services that provide job readiness, training, education, and a pathway to competitive employment are not fully accessible to all customers, particularly BBVS customers.

**Recommendations/Measurable goals:**

1. OVR will provide a heightened level of cross training and resources between BBVS and BVRS staff to meet the capabilities of all customers.

**OVR Response:** OVR accepts this recommendation. OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus. BVRS and BBVS Bureau Managers will continue to build on the success of visits by the Bureau Directors to each District Office by visiting the District Offices and promoting collaborative efforts. Cross trainings for BBVS and BVRS, including accessibility, are planned for the next two years.

2. OVR will increase BBVS and BVRS staff to focus on providing additional services, programs, and resources for students and customers.

**OVR Response:** OVR accepts this recommendation. OVR continues to submit employment postings supported by existing complement positions and the availability of funds and will work with the Governors' Office of Talent Acquisition to assist with talent recruitment.

3. OVR will consult with creditable sources outside the Agency to provide training related to specific disabilities to enhance current training provided by OVR.

**OVR Response:** OVR accepts this recommendation. OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus. Within these topics, outside presenters are often included to ensure staff are aware of the most current information.

**4. Promoting Competitive Integrated Employment Workplace Settings**

**Issue:** Organizations located within PA with the goal to hire a majority of employees with disabilities may be implementing hiring initiatives and policies detrimental to the continued development of competitive, integrated workplace settings, thus negatively impacting existing employment models.

**Recommendations/Measurable goals:**

1. WIOA defines CIE as work that is performed on a full-time or part-time basis for which an individual is: 1) compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and

experience; 2) receiving the same level of benefits provided to other employees without disabilities in similar positions; 3) at a location where the employee interacts with other individuals without disabilities; and 4) presented opportunities for advancement similar to other employees without disabilities in similar positions. OVR will provide education and outreach to organizations that it partners with to help ensure PA's workplace settings align with the WIOA definition of CIE.

**OVR Response:** OVR accepts this recommendation. OVR's policy and review process is aligned with WIOA's definition of CIE and OVR's Business Services & Outreach Division (BSOD) will be providing information and education materials to new employers with whom they engage. When necessary, OVR conducts site visits with employers to ensure they are compliant with the CIE policy. When a CIE assessment is completed, a report is written and given to the appropriate District Office and the business.

2. OVR will collect and analyze customer data such as wages, location/interaction, natural supports, advancement opportunities, and equal pay and benefits to measure the competitive environments and economic opportunities for people with disabilities.

**OVR Response:** OVR accepts this recommendation. OVR utilizes RSA's data when analyzing pay and areas of placement. OVR's Business Services staff work to ensure the placement of persons with disabilities meets the above requirements. OVR collects data in accordance with requirements of the RSA-911 file. OVR can use this information to analyze this type of information to ensure OVR customers are obtaining sustainable employment opportunities that provide a living wage and career advancement opportunities.

3. OVR will inform and educate their partner organizations on the importance of, and opportunities for, upward mobility, career advancement, best practices, location with interaction, collaboration within the workplace, natural supports, and equal pay and benefits to ensure the workplace is maintaining CIE.

**OVR Response:** OVR accepts this recommendation. Provider trainings and other regularly scheduled meetings are held by Central Office on an ongoing basis. Local District Offices maintain contact with their partner organizations to ensure they are aware of the above measures.

#### Office Hour Types

- Supported Employment - meet monthly to review SE Provider Agreement requirements, deliver a focused training or open discussion, showcase funding-diversification opportunities, spotlight one provider's agency and success story, and share upcoming resources and training announcements.

- WEXA - meet monthly to review the provider agreement, verify CRP staff credentials, examine WEXA reports, outline next-step actions after completion, share WEXA success stories, and answer providers' questions.
- Pre-ETS - meet quarterly or more often as needed to review the provider agreement, provide technical assistance, deliver a focused training, and answer providers' questions.

## **5. Customer Satisfaction Surveys**

**Issue:** The PaRC reviews OVR Customer Satisfaction Surveys monthly to assist with developing the State Plan and evaluate and make recommendations regarding the effectiveness of PA's VR services; however, efforts to rectify concerns regarding low response rates and the lack of accessibility for customers to provide input on their experiences with VR services and programs remain insufficient.

### **Recommendations/Measurable goals:**

1. OVR will increase Customer Satisfaction Survey accessibility and response rates by 10% each year.

**OVR Response:** OVR accepts this recommendation. OVR will continue to evaluate its Customer Satisfaction process and look for creative ways to increase the response rate.

2. To increase response rates, OVR will consider using Summer Interns to call customers and complete the surveys using the communication method which best meets the needs of the customer.

**OVR Response:** OVR accepts this recommendation. OVR currently has a devoted staff member who handles the above, and a summer 2025 intern in the Business Services & Outreach Section will assist with the customer satisfaction surveys.

## **6. Identification of populations served by BVRS and BBVS.**

**Issue:** There is no discrimination between employment outcomes specifically defined for customers of BVRS and BBVS, or separate fiscal reports provided for each Bureau.

### **Recommendations/Measurable Goals:**

1. OVR will provide separate lists of employers for each BVRS and BBVS Bureau.

**OVR Response:** OVR rejects this recommendation. OVR District Offices work with employers that provide career services for all Pennsylvanians with disabilities. Each placement is unique to the individual's strength and abilities.



2. OVR will provide a fiscal report for each BVRS and BBVS Bureau outlining the expenditures for customers in their respective VR programs.

**OVR Response:** OVR accepts this recommendation. OVR will provide a fiscal report regarding expenditures of services.

**(b) Comprehensive Statewide Needs Assessment (CSNA).**

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

**(1)** The VR services needs of individuals with disabilities residing within the State, including:

**(A) Individuals with the most significant disabilities and their need for Supported Employment (SE).**

OVR contracted with the Institute on Disabilities at Temple University, PA's University Center for Excellence in Developmental Disabilities, to conduct and interpret the CSNA required for PY 2019-2021. This is the most recently completed assessment. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in PA. Specific requirements of the CSNA can be found in the Rehabilitation Act of 1973, at Section 101(a)(15) and at federal regulation 34 CFR § 361.29. The CSNA is required to be completed every three years and assists OVR and PaRC in the development of the State Plan. Section 361.29 of the regulations outlines the specific topics to examine, including specific populations and the cooperation of stakeholders and providers.

A steering committee comprised of OVR staff, members of PaRC, and the Client Assistance Program participated in an initial meeting to review and approve customer satisfaction surveys. These participants remained as vital collaborators in the development and review phases of the CSNA process.

OVR initiated a new CSNA project for PY 2022-2024, again with Temple University's Institute on Disabilities. With the waning of the COVID-19 pandemic and more relaxed physical distancing protocols, this new project should mark a return to traditional in-person interviews, focus groups and site visits. The projected deadline will be for a final report expected in May 2026. This is also a collaborative effort with the PaRC, whose members received quarterly updates on the progress of the project, along with OVR leadership, and the OVR State Board members. Findings from this new CSNA project will be included in the development of the next VR Services Portion of the Combined State Plan expected to be drafted in 2027-2028.

**Comparison of Pennsylvania to National Population Statistics**

Information in the chart below, taken from the CSNA report, represents the estimated percentage of individuals in various age, sex, and race/ethnicity

categories that have generalized disability identifications in PA and across the nation in 2017-2019.

### Comparison of Pennsylvania to National Population Statistics

<b>Disability Identification across demographic variables</b>	<b>U.S. % Est (2017)</b>	<b>U.S. % Est (2018)</b>	<b>U.S. % Est (2019)</b>	<b>PA % Est (2017)</b>	<b>PA % Est (2018)</b>	<b>PA % Est (2019)</b>
<b>Total civilian noninstitutionalized population</b>	12.7	12.6	12.7	14.1	14.1	14.0
<b>Population under 5 years</b>	0.7	0.7	0.7	0.9	0.9	0.5
<b>Population 5 to 17 years</b>	5.5	5.5	5.6	7.0	7.0	7.4
<b>Population 18 to 34 years</b>	6.4	6.4	6.7	7.0	7.6	7.9
<b>Population 35 to 64 years</b>	12.7	12.5	12.4	13.9	13.7	13.6
<b>Population 65 to 74 years</b>	25.0	24.4	24.1	24.0	23.3	22.6
<b>Population 75 years &amp; older</b>	48.7	47.5	47.1	47.9	46.5	45.3
<b>Male</b>	12.6	12.5	12.6	13.8	13.6	13.7
<b>Female</b>	12.8	12.7	12.8	14.4	14.5	14.3
<b>White alone</b>	13.3	13.2	13.2	14.1	13.9	13.8
<b>Black or African American alone</b>	14.0	13.8	14.1	16.6	16.7	17.0
<b>American Indian and Alaska Native alone</b>	17.3	16.9	17.2	20.8	24.0	20.6
<b>Asian alone</b>	7.1	6.9	7.2	7.0	7.3	6.9

<b>Disability Identification across demographic variables</b>	<b>U.S. % Est (2017)</b>	<b>U.S. % Est (2018)</b>	<b>U.S. % Est (2019)</b>	<b>PA % Est (2017)</b>	<b>PA % Est (2018)</b>	<b>PA % Est (2019)</b>
<b>Native Hawaiian and other Pacific Islander alone</b>	10.3	11.1	10.6	N	8.6	16.1
<b>Some other race alone</b>	8.0	8.4	8.4	12.7	18.1	17.8
<b>Two or more races</b>	11.1	10.7	11.0	13.0	12.2	13.2
<b>White alone, not Latinx</b>	14.0	14.0	14.1	14.2	14.0	13.9
<b>Latinx (of any race)</b>	9.0	9.0	9.1	12.7	13.9	13.8

Source: 2018 and 2021 American Community Survey 1-Year Estimates

Compared to the estimated national rate of disability identification in 2017 (12.7%), 2018 (12.6%), and 2019 (12.7%), PA has a slightly higher rate of disability identification in its total civilian population (14.1% in 2017, 14.1% in 2018, and 14.0% in 2019). In 2017, PA civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (PA: 7.0% and 13.9% vs. U.S.: 6.4% and 12.7%). This trend continued in 2018, with PA civilians ages 18-34 years old (PA: 7.6% vs. US: 6.4%) and 35-64 years old (PA: 13.7% vs. U.S.: 12.5%) and in 2019 with, PA Civilians ages 18-34 years old (PA: 7.9% vs. US: 6.7%) and 35-64 years old (PA: 13.6% and US:12.4%).

The estimated national average of individuals identifying as having a disability who were employed was 24.0% in 2018 and 25.9% in 2021, and in PA, the estimated average was 24.1% in 2018 and 25.1% in 2021. The rate of unemployment for individuals with disabilities across the United States in 2018 was 2.8%, compared to 3.0% in PA in 2018, and in 2021 across the United States and in PA it was 3.8% (American Community Survey, 2018 and 2021). The Bureau of Labor Statistics, Census Bureau, and other relevant data sources calculate employment and unemployment rates based on those conceived as among the civilian labor force. Some people with disabilities may be perceived by themselves or others as not in the civilian labor force but may desire employment; this is sometimes referred to as joblessness rather than unemployment.

Customer satisfaction surveys were developed as part of the CSNA to determine future VR needs of those customers with the most significant disabilities and their need for SE services. These surveys were designed and used to elicit feedback from customers in Status 26 Closed Rehabilitated, Status 28 Closed after Individualized Plan for Employment (IPE) Initiated, and Transition Services for Youth and Students with Disabilities. Data collected from these surveys will be used to demonstrate successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities. It will be up to OVR to review these surveys on a regular basis to gather this information. Data collected from these surveys is currently reviewed on a quarterly basis between OVR and PaRC (during Customer Satisfaction Committee meetings) to determine successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities.

**(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.**

Evaluation of the VR needs of individuals with disabilities who remain unserved or underserved was conducted via primary and secondary data collection and analysis. Secondary data included state and federal agency reports and evidence-based research. Through the “Information about your Employment Services” mixed methods survey (August 2021), Community Rehabilitation Program (CRP) staff indicated that the most underserved communities in PA, in order of significance, were:

- People in rural areas
- People with mental health needs
- People who are blind or visually impaired
- People with Autism Spectrum Disorder
- People involved with the justice system (victims, defenders, or parolees)
- People who are deaf or hard of hearing
- Racially or ethnically marginalized people (described in the survey as “racial or ethnic minorities”)
- People with intellectual disabilities
- Non-English speakers or English non-dominant speakers
- People with developmental disabilities
- People with physical disabilities

- People with neurological disabilities
- People with substance use disorder
- Seniors
- Transition-age students or youth
- Veterans.

In addition, the CSNA identified a few additional hidden communities, including state center residents, people with immigrant or non-citizenship status, parents with disabilities, people living with HIV/AIDS, children engaged in the foster care system, individuals experiencing homelessness, and people who require assistive technology (AT). It should be noted that people who are unserved or underserved by OVR may identify with multiple unserved or underserved communities and face compounding marginalization.

**(C) Individuals with disabilities served through other components of the workforce development system; and**

WIOA was built upon decades of workforce development legislation and reauthorized the workforce investment system. WIOA has mandated that Title I Workforce programs for Youth, Adults and Dislocated Workers; Title II Adult Education and Literacy programs; Title III Wagner-Peyser Act of 1933 Employment Services (American Job Centers known in PA as PA CareerLink®), and Title IV, the public VR program as defined by the Rehabilitation Act of 1973, as amended, work together to improve alignment, coordination, cooperation and collaboration in services to businesses. This has led to a greater emphasis on student/youth career pathways, Competitive Integrated Employment (CIE) for persons with disabilities, and increased business engagement. Consequently, the sections below detail the needs of the customers and constituents of these agencies as well as the efforts of these agencies to partner to best serve their mutual customers.

The PA Governor's Policy Office established the Employment First Commission task force to include representatives of all agencies who administer workforce development programs. The group was tasked with increasing collaboration and communication across state agencies and with providing recommendations to the Governor's Office to improve workforce development programs and activities in the Commonwealth.

The core workforce system partnership consists of:

- Department of Labor & Industry (DLI)
  - CareerLink
  - Office of Vocational Rehabilitation (OVR)

- Office for the Deaf & Hard of Hearing (ODHH)
  - Bureau of Blindness & Visual Services (BBVS)
  - Bureau of Disability Determination
- Department of Community & Economic Development
- Department of Education (DOE)
- Department of Human Services (DHS)
  - Office of Children, Youth & Families
  - Office of Developmental Programs (ODP)
  - Office of Long-Term Living (OLTL)
  - Office of Mental Health & Substance Abuse (OMHSAS)
- Department of Aging

Other programs engaged in the statewide workforce investment system and interagency work group include:

- Department of Agriculture
- Department of Military & Veterans Affairs
- Department of State
- Department of Corrections
- Governor's Office

The interagency workforce investment work group is coordinated by the PA WDB. In PA, workforce investment is managed across 23 regional Local Workforce Development Areas (LWDA), each of which has a WDB. WDBs are comprised of a board of governor-appointed workforce development stakeholders which develops locally responsive workforce policies and strategies and oversees their region's PA CareerLink® centers.

Interagency referrals greatly affect who learns about OVR and accesses services. While individuals may self-refer, many learn about OVR through county/administrative entities, supports coordination organizations and agencies, providers of employment-related services, high schools, universities and colleges, doctors and health agencies, and many other community organizations. Effective cross-agency collaboration requires that services are coordinated and unduplicated. PA ensures this through utilization of a statewide data system Commonwealth Workforce Development System (CWDS) and associated workgroup.

OVR also participates with many advisory committees that rely on the expertise of community leadership. OVR has continued to reach out to

include the people and organizations that work for the VR community. The following are just a few committees with whom OVR collaborates:

- Advisory Committee for the Blind
- Advisory Committee for the Deaf & Hard of Hearing
- Business Leadership Networks
- PA Chambers of Commerce
- PA Council on Independent Living
- PA Developmental Disabilities Council
- PA Initiative on Assistive Technology (PIAT)
- PA Rehabilitation Council (PaRC)
- Pennsylvania Assistive Technology Foundation (PATF)
- Pennsylvania Client Assistance Program (CAP)
- Pennsylvania Rehabilitation Association (PRA)
- Rehabilitation & Community Providers Association (RCPA)
- Society for Human Resource Management (SHRM)
- Statewide Independent Living Council (SILC)

In the summer of 2021, the PA Workforce Coalition was established to address the needs of businesses and employment of people with disabilities. The PA Workforce Coalition is comprised of key PA state agencies and state business leadership including OVR:

- PA Association of People Supporting Employment First (APSE)
- PA Office of Developmental Programs (ODP)
- PA Office of Long-Term Living (OLTL)
- PA Office of Mental Health & Substance Abuse Services (OMHSAS)
- PA Department of Labor & Industry (DLI)
- PA Workforce Development Board (WDB)
- PA Chamber of Commerce
- PA Chamber of Black Owned Business
- PA Training & Technical Assistance Network (PaTTAN)
- PA Advocacy & Resources for Autism & Intellectual Disability (PAR)
- PA Rehabilitation & Community Providers Association (RCPA)

Survey data captured by the PA Workforce Coalition in September of 2021 revealed that:

- 50 of 77 (65%) employers are not tapped into the disability community for talent acquisition.
- 65 of 77 (84%) employers have not connected to OVR.
- 26 of 77 (34%) employers have not connected with a PA CareerLink®.
- Only 9 of 77 (12%) employers have a connection with a disability employment provider.

The leading needs of the individuals with disabilities served by the agencies/programs engaged in the statewide workforce investment system and interagency work group is provided below.

### **Needs of Individuals Served by the Department of Labor & Industry (DLI)**

The needs of individuals with disabilities served by DLI include:

- Information about high demand employment opportunities that match their career interests.
- Employment resources from *PA CareerLink®* and OVR to be made accessible to them in more coordinated ways by these offices.
- Clear pathways to apprenticeships through direct support from trained professionals within OVR and/or DLI's Apprenticeship & Training Office (ATO).
- More apprenticeship opportunities to be made available to them through organizations that work with their communities.

### **Needs of Individuals Served by the Department of Human Services (DHS)**

The needs of individuals with disabilities served by the Department of Human Services (DHS) include:

- Increased opportunities for competitive employment.
- Training and continued education throughout their careers.
- Screening mental health and substance use disorders as part of employment services.
- Mental health and substance use disorder treatment offered alongside employment services.
- Assistance navigating the joint services offered through Experience the Employment Connection (EEC).

### **Needs of Individuals Served by the Department of Community & Economic Development**



The needs of individuals with disabilities served by the Department of Community & Economic Development include:

- Access to employers who have been trained in strategies to hire and retain individuals with disabilities.
- Increased awareness and action from PA businesses on issues related to the Americans with Disabilities Amendments Act (ADAA) and employment.
- Access to employment services, job training, and other related supports throughout their career.
- Focused efforts to serve those individuals who are unemployed for 27 weeks or longer.

### **Needs of Individuals Served by the PA Department of Education (PDE)**

The needs of individuals with disabilities served by the PA Department of Education (PDE) include:

- Increased post-secondary education opportunities that provide accommodations for individuals with disabilities.
- Greater opportunities for continuing education throughout careers and employment.
- Outreach to local business and organizations through the Department of Community & Economic Development to increase apprenticeship, internship, training, and other employment opportunities.
- Access to affordable post-secondary education.
- Targeted outreach and support of those individuals with less than a high school degree and those who have completed only some post-secondary education.

### **Needs of Individuals Served by the Department of Aging**

The needs of Seniors 65 and older with and without a disability served by the Department of Aging include:

- Affordable prescription medications.
- Access to in-home care and services.
- Available and affordable housing options.
- Available and affordable transportation.
- Dementia-capable and dementia-friendly communities.
- Access to mental health services.
- Expanded employment opportunities.

- Person-centered planning that fosters independence and self-sufficiency.
- Support (health care, paid employment, affordable transportation, and affordable housing) when released from Department of Corrections.

### **Needs of Individuals Served by the Department Of Agriculture**

The needs of individuals with disabilities served by the Department of Agriculture include:

- Improved transportation infrastructure.
- Access to affordable and reliable transportation.
- Outreach about employment and career opportunities in the agricultural industry.
- Increased representation in the department of agriculture reporting and planning.

### **Needs of Individuals Served by the Department of Military & Veterans Affairs**

The needs of individuals with disabilities served by the Department of Military & Veterans Affairs include:

- Direct support to navigate access affordable housing to avoid experiencing homelessness.
- Pathways out of homelessness and into stable housing situations.
- Coordinated resources between the OVR and the Veterans Administration (VA) to reduce overlap, wait time, and miscommunications about services.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

### **Needs of Individuals Served by the Department of Corrections**

Needs of individuals with disabilities served by Corrections include:

- Employment services that mitigate and work past the prejudices held by employers against individuals with criminal justice records.
- Available and affordable housing, transportation, and health care.
- A reduction of the length of time a minimal infraction remains on their criminal background check.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

**(D) Youth with disabilities, including students with disabilities and their need for Pre-Employment Transition Services (Pre-ETS).** Include an assessment of the needs of individuals with disabilities for transition career services and Pre-ETS, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).

As part of the 2019-2021 CSNA, Temple University's Institute on Disabilities researchers used surveys and interviews with workforce professionals to identify barriers to and strategies for increasing services and support opportunities for students and youth with disabilities. The primary needs identified for Pre-ETS are:

- Summer programming to prepare for workforce and further education.
- More collaboration with employers on "soft skill" training.
- Increased expectations among family members for the future of their students and youth.
- Access to affordable and reliable transportation.
- Access to digital resources and technology needed for employment and education.
- Increased OVR presence at schools.

**(2) Identify the need to establish, develop, or improve CRPs within the State.**

According to CRP staff surveyed for the CSNA in 2021, the primary obstacles facing CRPs in their provision of employment services, in order of significance, are:

- Transportation issues.
- Staff turnover or being short-staffed.
- Loss of benefits or concern thereof.
- Inadequate ongoing/long-term supports or funding.
- Lack of cross-agency collaboration/coordination (e.g., referral process).
- Employer perceptions.

Transportation was identified as the most significant barrier to service provision and employment of people with disabilities in the 2021 CRP survey, the 2014-2016 PA CSNA, and became a Target Goal of the 2016-2018 CSNA. Lack of accessible transportation impact rural communities in particular.

Individuals with disabilities need:

- Flexibility with scheduling and planning for paratransit services.
- Reliable and consistent paratransit services.
- Transportation workers with cultural competency and disability awareness.
- The general assumption that people with disabilities are interested in employment or being active.
- Institutional or societal investment in transportation for people with disabilities.

Specific strategies and best practices for reducing transportation barriers to employment for people with disabilities include:

- Developing transportation alternatives and support networks specific for people with disabilities who want to be or are currently employed.
- Training people with disabilities to interact with transportation workers in effective ways to receive the information and services they need.
- Expanding community involvement in transportation initiatives.

As mentioned above, the lack of reliable transportation continues to be identified as the most significant barrier to both employment and employment services. To combat the barrier of transportation, some CRPs provide transportation, secure alternative transportation including natural supports when possible, and partner with the transit system. These efforts make a difference at the individual level. However, more work can be done at the community level and system-wide level to assure individuals with disabilities have access to reliable transportation. This work must be done with individuals with disabilities in order to be successful. Per the 2016-2018 CSNA report, the most successful transportation and employment initiatives included:

- Involvement of people with disabilities in the committee work being done within transportation authorities throughout PA.
- Inclusion of people with disabilities in the development of current transportation initiatives.

The Statewide Provider Partnership (SPP) has described changes to supported employment and Pre-ETS policies as “unsustainable” for CRPs. The situation has been exacerbated by the COVID-19 pandemic. CRPs feel unable or ill-equipped to provide services as required by OVR (consequent of WIOA, Employment First, etc.) due to procedural, temporal, and financial constraints. Providers cited several challenges related to the Performance-Based SE (PBSE) payment model. Rather than establish additional CRPs, it is recommended that OVR focus on retaining existing CRPs. According to the SPP, retention would require OVR to follow up and act on the issues discussed

during the productive convenings held between providers and OVR on January 13, 2020.

Many providers are interested in receiving more referrals and recommend more regular communication with OVR. Regular technical assistance and training calls, an SE provider email list, and SE resource accounts for technical and policy questions have been established and are being utilized for communication with and to support CRPs.

A majority of CRPs surveyed advised that intake and service provision could be significantly improved if providers received more information about the potential customer in the initial report (such as reports or records from other VR services, employment goals, etc.). Providers would benefit from a more standardized approach to the types and time frames of relevant documents attached to the referral. Similarly, providers stated that more timely transition from a Community Based Work Assessment (CBWA) and waitlists for services would have a positive impact on placing individuals in employment. Providers noted that virtual meetings have helped speed the intake process. A majority advised that intake and service provision could be significantly improved if the customer received greater explanation of potential services in plain language.

The Hiram G. Andrews Center (HGAC) is the State-owned and operated comprehensive rehabilitation center in PA, a CRP providing necessary VR services to individuals with disabilities. HGAC provides a comprehensive program of services including the integration of Pre-ETS, education on campus at the Commonwealth Technical Institute (CTI), vocational counseling, vocational evaluation, and physical restoration in a barrier free environment for individuals with disabilities leading to CIE. The PA DLI's Center for Workforce Information & Analysis lists welders, cutters, solderers and brazers as High Priority Occupations (HPOs) for PA's industry-driven approach to workforce development. The purpose of the HPO lists is to align workforce training and education investments with occupations that are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages. HGAC's expansion of services, involving expanding the welding program, will help prepare workforce needs in HPOs such as welding services and opportunities for welding employment in the State. In order to keep the Center operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to: electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to the Rehabilitation Services Administration (RSA) for related costs that exceed the capital expenditure threshold used by the State.

**(c) Goals, Priorities, and Strategies.**

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

**(1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and**

The state goals and priorities for the VR Services Portion of the PA Combined State Plan were initially developed jointly with OVR Executive Staff and the PaRC Policy & State Plan Committee during a teleconference meeting exchange on March 20, 2023. Any projections, program continuations, etc. in this description are subject to the availability of funding in the plan year.

**(2) Identify measurable goals and priorities in carrying out the VR and SE programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—**

**(A) Support innovation and expansion activities;**

**(B) Overcome barriers to accessing VR and SE services;**

**(C) Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and Pre-ETS); and**

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

**Goal 1: Increase Competitive Integrated Employment (CIE) Opportunities for Individuals with Disabilities**

- 1.** Explore the utilization of alternative transportation services, not limited to Lyft or Uber, for job placement services.
  - a.** Conduct outreach to all transportation services within PA to identify interested vendors, targeting rural areas.

- b.** Develop a provider agreement that offers a competitive rate to potential vendors.
  - c.** Enroll vendors into case management system.
- 2.** Increase VR services and outcomes for the blind/visually impaired.
  - a.** Conduct staff training to ensure all OVR program information is provided to this population (individuals who are blind/visually impaired).
  - b.** Increase awareness of OVR programming for customers who are blind/visually impaired via outreach events targeted for this population.
  - c.** Monitor District Offices that serve individuals who are blind/visually impaired to ensure this population has equal access to all services.
- 3.** Promote accessibility and technology based upon universal design principles.
  - a.** Conduct outreach to Assistive Technology (AT) vendors within PA to identify interested vendors.
  - b.** Conduct staff training on AT and universal design principles.
  - c.** Utilize all existing resources within PA to ensure staff are equipped with the necessary tools to provide education to all customers.
- 4.** Expand training for Community Rehabilitation Providers (CRPs) and increase services for customers with mental health disabilities.
  - a.** Identify the most up to date evidence-based practices for individuals with mental health disabilities seeking employment.
  - b.** Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
  - c.** Monitor efficacy of and outcomes for customers with mental health disabilities.

## **Goal 2: Increase Transition Services for Students with Disabilities**

- 1.** Develop and expand summer, during, and after school Pre-Employment Transition Services (Pre-ETS) programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
  - a.** Continue to expand upon already established successful programming to include all populations served by OVR in order to prepare students with disabilities for a seamless transition from secondary school to CIE.

- b.** Conduct research to identify evidence-based practices for during and after school curriculum and programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
  - c.** Implement and monitor programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
- 2.** Increase statewide collaboration with the Bureau of Special Education (BSE) and the Office of Developmental Programs (ODP) to expand Pre-ETS across Departments.
  - a.** Continue to build upon already established Memorandum of Understanding (MOU) with BSE to enhance and expand Pre-ETS across Departments.
  - b.** Continue to build upon the already established MOU with ODP to enhance and expand Pre-ETS across Departments.
  - c.** Establish consistent and regular communication with BSE and ODP to identify the potential for new pre-ETS programming.
  - d.** Implement and monitor programming to prepare Students with Disabilities for a seamless transition from secondary school to CIE.
- 3.** Identify School Districts and/or Charter Schools with low Pre-ETS outcomes and assist to increase positive outcomes during transition.
  - a.** OVR will evaluate the data available within Commonwealth Workforce Development System (CWDS) to determine what school systems are not actively participating in Pre-ETS activities.
  - b.** Based on the available data, OVR will develop specific outreach activities for those schools.

### **Goal 3: Increase Community Education and Outreach**

- 1.** Increase outreach to Department of Corrections to establish contact with reentrants and reduce recidivism.
  - a.** Identify a single point of contact (SPOC) for all State Correctional Institutions to begin collaboration on re-entry programming.
  - b.** Provide training to all OVR staff on re-entry initiatives.
- 2.** Increase social media and alternative outreach methods.
  - a.** Increase social media postings in order to highlight OVR success stories and positive outcomes of all OVR programming.
  - b.** Utilize additional media outlets to provide community outreach and education on OVR services.



#### **Goal 4: Initiate and Complete Capital Improvement Projects at HGAC**

1. Increase opportunities for students through capital projects, including improvement of student training areas and development of new classrooms and other updated campus features as budget and resources allow.
  - a. Through the enhancement of student training areas, begin outreach to attract new students.
  - b. Through the enhancement of technology and infrastructure, begin outreach to populations traditionally underserved by HGAC.
  - c. Through the enhancement of campus features, improve the collegiate experience for current and potential students.
2. Promote accessibility and technology through capital improvements based on universal design principles as budget and resources allow.
  - a. Remodel outdated accessibility in restrooms, classrooms, and dormitories due to age of facility.
  - b. Evaluate current technology available on campus and update as needed.
  - c. Conduct staff training on AT and universal design principles.
3. Phased renovation of the dormitories at HGAC as budget and resources allow.
  - a. Work with design team to optimize available space, increase accessibility to current standards, and add modern features.
  - b. Coordinate current and incoming enrollment with construction schedule to maximize facility utilization during renovation phases.

#### **Goal 5: Increase Usage Opportunities At HGAC/CTI.**

1. Expand outreach to non-traditional referral sources including increase of online presence.
  - a. Strategize marketing events and efforts to target non-traditional referral sources.
  - b. Strategize use of social media, website, virtual tour and other on-line marketing tools.
  - c. Continue to improve application and payment options for non-traditional students.
2. Expand opportunities for individuals who are blind/visually impaired.
  - a. Continue to partner with BBVS to evaluate/update current technology and program accessibility.

- b.** Conduct staff training to improve HGAC/CTI service delivery to this population of customers.
  - c.** Continue to evaluate satisfaction surveys and feedback from stakeholders.
- 3.** Expand the availability of services and education offered, including virtual learning opportunities.
  - a.** Continue to conduct feasibility studies and evaluate labor market trends for new training programs and credentials.
  - b.** Continue to research and develop virtual services specific to driver education, vocational assessment, and career preparation.

### **Goal 6: Increase SE/VR Outcomes**

- 1.** Expand training for CRPs.
  - a.** Identify the most up to date evidence-based practices for SE.
  - b.** Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
  - c.** Monitor efficacy of and outcomes for customers with mental health disabilities.
- 2.** Expand training for VR staff.
  - a.** Provide staff with training on evidence based best practices for supporting customers in obtaining CIE.
  - b.** Support staff through ongoing workshops and in-service trainings to ensure all OVR programming is being discussed with all populations served.
  - c.** Monitor efficacy and outcomes of trainings to identify knowledge gaps.
  - d.** Train CRPs on diversifying funding through sources such as ODP and OLTL Supported Employment, becoming Employment Networks, and delivering employment services to both youth and adults across all stages of career development.
- 3.** Conduct outreach to employers to increase CIE.
  - a.** Provide employers with disability related work incentives/tax credits/employment supports.
  - b.** Educate employers on OVR employer specific services.
  - c.** Conduct disability etiquette training, ADAA evaluations, and on-going support during the onboarding process to enhance the relationship between the employer and OVR.

**(d) Evaluation and Reports of Progress: VR and Supported Employment Goals.**

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

**(1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs.**

**Goal 1: Increase Competitive Integrated Employment (CIE) Opportunities for Individuals with Disabilities**

- a. Conduct outreach to all transportation services within PA to identify interested vendors, targeting rural areas.
- b. Develop a provider agreement that offers a competitive rate to potential vendors.
- c. Enroll vendors into case management system.

Pre-ETS Transportation—Since 2021, OVR has advanced efforts to expand transportation options for students participating in Pre-ETS by developing provider agreements and engaging with both traditional and alternative transportation providers

- **Standardized Transportation Provider Agreement** was created and implemented in 2021. To date, 15 agencies have been approved and enrolled in the case management system under this agreement, including both rural and urban providers, including two new providers added in 2025.
- **Zone Transportation** codes were added to our service menu to provide transportation to Pre-ETS programming in 2022 and we currently have 132 providers approved to provide zone transportation.
- **Diverse Transportation Options:** students have access to a range of transportation solutions that include ride-share services such as Uber and Lyft, public transit systems, and private transportation companies. This flexibility allows for greater access to Pre-ETS, particularly for student in underserved rural areas where traditional transit may not be available.

OVR completed presentations to PA Department of Transportation (PennDOT) providers in September 2024 to identify interested providers, and district offices (DOs) continue to outreach to their local transportation providers as needed.

For program year 2024, there were 324 new transportation providers added to the case management system.

Uber was contacted during this program year in order to explore options for potential collaborations. OVR is still awaiting their response and is planning future follow-up.

The VR Specialist for Vehicle Modifications has been participating in a Community of Practice on Transportation which discusses and shares resources for transportation across the country. Topic areas include ride share, public transit, and rural transportation.

OVR and the PA Department of Education (PDE) have been collaborating to reach driving schools across the state regarding the provider agreement for driving services. To date, 37 driving schools have been enrolled in the case management system. Some driving schools serve rural areas in PA.

**2. Increase VR services and outcomes for the blind/visually impaired.**

- a.** Conduct staff training to ensure all OVR program information is provided to this population (individuals who are blind/visually impaired).
- b.** Increase awareness of OVR programming for customers who are blind/visually impaired via outreach events targeted for this population, including in-person outreach and BBVS-specific MY Work events.
- c.** Monitor DOs that serve individuals who are blind/visually impaired to ensure this population has equal access to all services.

The Bureau Director for BBVS visited all BVRs DOs to speak to OVR staff and educate them on BBVS services.

BBVS staff participated in targeting trainings and conferences, including Basics of Guide Dogs for Orientation & Mobility (O&M) Instructors training in September 2024, International O&M Online Symposium in January 2025, and Pennsylvania/Delaware Chapter of the Association for Education & Rehabilitation of the Blind & Visually Impaired conference in April 2025.

The OVR Training Specialist continues to identify gaps in knowledge and compare current training practices with best practices in the field and will develop a training plan based on identified needs. The trainings may include webinars, e-learning modules, and shadowing/field work. The Training Specialist will utilize National Federation for the Blind (NFB), Hadley Institute, and local Centers for Independent Living (CILs) for presentation opportunities.

- 3. Promote accessibility and technology based upon universal design principles.**
- a.** Conduct outreach to Assistive Technology (AT) vendors within PA to identify interested vendors.
  - b.** Conduct staff training on AT and universal design principles.
  - c.** Utilize all existing resources within PA to ensure staff are equipped with the necessary tools to provide education to all customers.

The OVR Deaf/Hard of Hearing/Deafblind Statewide Specialist has participated as a member of the steering committee of the Pennsylvania Tech Accelerator program. The goal of this statewide initiative is to expand the awareness of, and access to, AT to build capacity of AT users, and to measure effectiveness around AT use, access, and service across the Commonwealth. The Institute on Disabilities at Temple University, within the College of Education & Human Development, is partnering with the PA Office of Developmental Programs (ODP) and Office of Long-Term Living (OLTL), Department of Human Services, and the University of Kansas Center on Disabilities' State of the States team on this initiative. The steering committee has identified areas of need surrounding access and the use of AT throughout PA, of which OVR and other partners are playing a part in working toward better access to AT throughout PA. More information can be found at [PA Tech Accelerator](#).

OVR has conducted outreach to AT vendors both in PA and nationally, due to limited AT vendors within PA and a large majority of AT vendors being national. Through the National Council of State Agencies for the Blind (NCSAB) the BBVS Bureau Director connected with representatives from Aira, a service that provides on-demand visual interpreting for people who are blind or have low vision, and Duxbury Systems, a world leader in software for braille. A new agreement was completed with Duxbury.

The OVR Training Specialist has begun identifying ways for staff to understand Universal Design (UD) and integrate AT and UD to improve inclusive environments. An in-service training was conducted for all OVR staff to provide instruction on developing accessible documents in May 2025, and a plan is in development to provide ongoing training in this area. The Training Specialist has also continued to work on improving the inclusive mindset among staff, continues to address individual and agency needs, and will continue to encourage an inclusive culture and provide further training opportunities to OVR staff.

## **Goal 2: Increase Transition Services for Students with Disabilities**

- 1.** Develop and expand summer, during, and after school Pre-Employment Transition Services (Pre-ETS) programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
  - c.** Continue to expand upon already established successful programming to include all populations served by OVR in order to prepare students with disabilities for a seamless transition from secondary school to CIE.
  - d.** Conduct research to identify evidence-based practices for during and after school curriculum and programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
  - e.** Implement and monitor programming to prepare students with disabilities for a seamless transition from secondary school to CIE.

In program year 2024, OVR continued its investment in Pre-ETS, directing an estimated \$20 million/15% of the federal VR grant toward programming for students with disabilities. However, due to necessary agency-wide re-prioritization, OVR was forced to reduce the overall volume of Pre-ETS, including summer and after-school offerings. Despite these adjustments, several key initiatives demonstrated measurable outcomes and strategic impact.

### **Statewide Service Delivery and Reach**

- 15,345 students received Pre-ETS
- OVR Staff attended 8,534 Individualized Education Plan (IEP) Meetings
- 1,880 total outreach events were provided/attended by Early Reach Coordinators (ERCs).

### **Partnership and Program Investments**

- \$1,276,091 in Pre-ETS funding was invested in programming for students affiliated with the Bureau of Juvenile Justice (BJJS):
  - Services spanned group instruction, job exploration, and post-secondary planning
  - 691 potentially eligible BJJS students received Pre-ETS.
  - 86 BJJS students with a VR case received Pre-ETS.
  - 7 BJJS students with a VR case received Supported Employment (SE) services

### Specialized Summer Programming

- In 2024, the Deaf & Hard of Hearing Summer Academy served 16 students from across the Commonwealth with programming focused on vocational development and self-advocacy.
- In 2024, the Bureau of Blindness and Visual Services (BBVS) Summer Academy served 20 students with programming focused on independent living skills, AT, post-secondary skills, and budgeting.
- 1,214 students had paid work experiences at 297 job sites through the MY Work Program.

While the total volume of Pre-ETS programming decreased due to shifting priorities, OVR strategically maintained high-impact services and invested in key partnerships. These targeted efforts ensured that students with disabilities—particularly those in underserved or high-barrier populations—continued to receive meaningful support towards achieving competitive integrated employment.

- 2. Increase statewide collaboration with the Bureau of Special Education (BSE) and the Office of Developmental Programs (ODP) to expand Pre-ETS across Departments.**
  - a. Continue to build upon already established Memorandum of Understanding (MOU) with BSE to enhance and expand Pre-ETS across Departments.
  - b. Continue to build upon the already established MOU with ODP to enhance and expand Pre-ETS across Departments.
  - c. Establish consistent and regular communication with BSE and ODP to identify the potential for new pre-ETS programming.
  - d. Implement and monitor programming to prepare Students with Disabilities for a seamless transition from secondary school to CIE.

Evidence-based literature has consistently identified key predictors of post-school outcomes for students with disabilities. These include participation in paid work experiences during high school, enrollment in post-secondary education, access to self-advocacy instruction, and involvement in transition planning and services (Test et al., 2009; Mazzotti et al., 2021). Furthermore, studies have shown that early, high-quality Pre-ETS are positively associated with increased employment and education outcomes (Rutkowski et al., 2020; Fabian et al., 2016). In the 2024 program year, OVR maintained its commitment to providing students with disabilities opportunities to gain real-world workplace skills and experience in

inclusive community settings. However, due to the re-prioritization, OVR placed the Professional Connections Experience (PCE) on hiatus, and instead focused efforts on delivering the shorter, more cost-effective Professional Connections Foundation (PCF) model.

### **Professional Connections Foundation (PCF)**

A PCF is a 30-hour program, where students receive 15 hours of group instruction on workplace readiness and job exploration and 15 hours of employer. The PCF student stipend was also discontinued this program year due to funding constraints. 50 provider agencies across PA are available to deliver PCF programming.

### **Project SEARCH**

OVR continued its collaboration with Project SEARCH sites across PA. This internationally recognized model is a combined training and work experience for youth and adults with significant intellectual and developmental disabilities. It prepares students and young adults for CIE through internships hosted at employers like UPMC Hospitals and the Bucks County Government Center.

There will be 25 sites for the upcoming program year (21 student sites and 4 adult sites).

National Project SEARCH held their annual conference July 14-18, 2025, in Austin, Texas. OVR did not send staff to this year's conference due to funding constraints. However, 22 PA site partners attended.

The following sites received a 100% employment outcome award for the 2023-2024 program year:

- County of Bucks Government Center, Doylestown
- Wayne Memorial Hospital, Honesdale

The following sites achieved a 70-90% employment outcome for the 2023-2024 program year and earned an Excellent Outcome Award:

- Aramark, Philadelphia
- Drexel University, Philadelphia
- Education Center at the School District of Philadelphia "at 440", Philadelphia
- Lehigh Valley Hospital – Muhlenberg, Bethlehem
- Penn State Health St. Joseph, Reading
- UPMC Mercy, Pittsburgh



- UPMC Passavant, Pittsburgh
- WellSpan Health- York Hospital, York
- Wind Creek Bethlehem, Bethlehem

### **Youth Ambassador (YA)**

OVR supported eight YAs during the reporting year:

The Youth Ambassador program is a collaborative effort between OVR and the Department of Education's Bureau of Special Education. It is a research-backed way to engage students with disabilities more meaningfully while helping OVR meet its mission. The program facilitates a more seamless transition for youth as they complete secondary school and enter the workforce or prepare for college. YAs receive paid, purpose-driven, work-based learning experiences that help them build real-world skills. They learn self-advocacy, leadership, and other soft skills, Pre-ETS, as well as have the chance to lend their voice and insight into helping direct and support state-wide transition practices, with many opportunities for the practical application of such skills. Students with higher self-advocacy, leadership, and self-determination skills are more likely to enroll in college, obtain competitive integrated employment, and live independently. The YA program is leadership training, policy engagement, and workforce development rolled into one. It offers a structured experience with lasting career impact, and the program directly supports OVR's compliance with WIOA, Act 26, and Act 36 while strengthening the reach to underserved populations.

Evaluation and assessment of the YA program thus far yield the following metrics: All 8 YAs have current jobs and/or are attending college; their customer satisfaction surveys have been satisfactory or higher; YAs have earned GPAs of 2.0 or higher; and there is frequent engagement between YAs and their OVR Vocational Rehabilitation Counselors (VRCs). Over the past program year, just three YAs reached approximately 356 stakeholders and 574 peers through presentations, meetings, community events participation, and materials being shared/distributed through social media. YA highlights from the past program year include Kylee Diaz, who attended a legislative briefing at Capitol Hill in Washington, DC earlier this year, where she articulately shared her successful experience serving as an OVR YA at provider Colonial IU20 (in collaboration with OVR's Allentown DO), as well as spoke about the critical role OVR plays in supporting those with disabilities and advocated for increased funding and staffing to assist people with disabilities in the workforce. Ms. Diaz also demonstrated the

concept of youth directly supporting other youth by developing a youth-friendly brochure and tip sheet on the IEP process, as well as attended IEPs with students with disabilities and presented on this topic to schools/IU staff to help train them on the youth perspective of student-led IEPs. Mallory Irwin, a former YA with the Riverview IU6 (in conjunction with OVR's Erie District Office), now serves as a Young Adult representative on the PA Rehabilitation Council (PaRC), where she helps to ensure the youth voice is heard and that OVR services and programming reflect the current needs of youth and others with disabilities. YA Gabe Davis, with provider Special Olympics of Pittsburgh (in collaboration with OVR's New Castle District Office), served as the guest speaker at Representative Dan Miller's (home District 42 serving Allegheny County) Disability & Mental Health Summit; Gabe also presented at his provider site's (Special Olympics) Cities of Inclusion Disability Summit; at both events, he powerfully advocated for disability inclusion and access to employment.

- 3. Identify School Districts and/or Charter Schools with low Pre-ETS outcomes and assist to increase positive outcomes during transition.**
  - a. OVR will evaluate the data available within Commonwealth Workforce Development System (CWDS) to determine what school systems are not actively participating in Pre-ETS activities.
  - b. Based on the available data, OVR will develop specific outreach activities for those schools.

To improve equity in service delivery and ensure all students with disabilities have access to high-quality Pre-ETS, OVR initiative targeted efforts this program year to identify and support school districts and charter schools demonstrating low levels of Pre-ETS engagement or outcomes.

#### Data Analysis and Targeted Outreach

- OVR utilized data from CWDS and BSE's Indicator 13 to identify school systems with limited participation in Pre-ETS activities.
- This data-driven approach enabled the agency to begin tailoring outreach strategies to schools and regions with unmet needs.

#### Pathways to Partnership (P2P) Grant-Funded Evaluation and Technical Assistance

As part of the P2P grant, OVR began evaluating and researching underserved schools to identify systemic barriers to participation.

- IU-based teams will begin P2P funds to provide technical assistance in these districts with a focus on:

- Expanding awareness of available Pre-ETS
- Supporting schools in identifying eligible students
- Strengthening cross-system collaboration.
- Work-based Learning and Community Based Instruction (CBI) will be provided through CIL and/or CRP partners in at 16 sites statewide using P2P funds.
- Professional development courses, both Transition Systems Framework (TSF) and Charting the Life Course (CtLC), will be utilized within each IU region to help coordinate multi-agency engagement, leveraging training resources and convening OVR, PDE, and IU staff to review progress and refine strategies.

These activities reflect OVR's commitment to ensuring that all students can access meaningful transition services that support their journey toward competitive integrated employment.

### **Goal 3: Increase Community Education and Outreach**

- 1.** Increase outreach to Department of Corrections to establish contact with reentrants and reduce recidivism.
  - a. Identify a single point of contact (SPOC) for all State Correctional Institutions to begin collaboration on re-entry programming.
  - b. Provide training to all OVR staff on re-entry initiatives.

The VR Specialist who is the point of contact for re-entry programming has been communicating with Department of Corrections (DOC) in PY2024 to develop an OVR training that will be available to all new and current staff. They have also been working with a liaison from the Project REACH program to follow-up on individuals with brain injury that were being released from prison and referred to OVR. That project is wrapping up at the end of calendar year 2025, but OVR/Project REACH continue to follow up on referred individuals and create training programs for DOC staff. They are also in contact with the Re-Entry Bridge Program, which supports Certified Peer Support Specialists with criminal justice system involvement by offering employment guidance, support groups, career coaching, mentoring, and training.

Training on the pardon process was provided to staff during an in-service training in September 2024. Plans to present at another in-service training about re-entry are also planned for calendar year 2026.

- 2.** Increase social media and alternative outreach methods.

- a. Increase social media postings in order to highlight OVR success stories and positive outcomes of all OVR programming.
- b. Utilize additional media outlets to provide community outreach and education on OVR services.

The PA Department of Labor & Industry (L&I) social media accounts have increased highlights of OVR's successes. PA L&I accounts have potential for higher reach due to more followers than OVR's accounts (their Facebook account alone has approximately 128,000 followers). Their increased posts have expanded the audience that has seen OVR success stories and positive outcomes. Not only have they increased coverage of OVR, but the content produced has broadened to include more short clips/videos and the involvement of leadership, including department Secretaries, the Governor, and the First Lady.

As detailed above, the L&I parent channel has increased coverage of OVR's successes.

The following video success stories have been completed and have either been shared on social media or are in the process of being shared:

[John's Story](#)

[Maggy's story](#)

[Andrew's story](#)

[Demi's Story](#)

[Pat's Story](#)

OVR completed a 2024 annual report and distributed it to stakeholders. The report's successes and data will be shared on social media as well.

OVR is currently in the process of completing a 67-county success story compilation entitled **The Whole Story**. Each county (with some smaller counties combined) will have a publication that includes customer and partner success stories and data.

OVR's website has been updated to include a success story section:  
[OVR Success Stories](#)

#### **Goal 4: Initiate and Complete Capital Improvement Projects at HGAC**

1. Invest in the replacement and repair of end-of-life systems and structure within HGAC, including but not limited to, building automation replacement, security cameras replacement and upgrade,

phone system upgrade, campus-wide public restroom remodel, roof repairs, air handlers and cooling tower replacement and the repair to a failing ADA ramp/egress.

- c.** Through the enhancement of student training areas, begin outreach to attract new students.
- d.** Through the enhancement of technology and infrastructure, begin outreach to populations traditionally underserved by HGAC.
- e.** Through the enhancement of campus features, improve the collegiate experience for current and potential students.

The agency has completed the replacement and repairs as planned. Outreach to attract new students has begun and progress can be demonstrated through a 23% increase in referrals and 6% in program enrollment. Outreach to underserved populations has occurred through the development of referral pipelines with referral sources (such as the juvenile justice system). The student collegiate experience continues to evolve and can be demonstrated through student satisfaction surveys and student participation in campus leadership opportunities.

**2.** Increase opportunities for students through capital projects, including new classrooms, upgrades to existing classrooms and updated campus features.

- d.** Remodel outdated accessibility in restrooms, classrooms, and dormitories due to age of facility.
- e.** Evaluate current technology available on campus and update as needed.
- f.** Conduct staff training on AT and universal design principles.

The agency completed the new classroom for the Early Childcare Education program and opened the program for its first term in January 2025. Plans for other remodeled classrooms and dormitories are delayed due to budgetary constraints. As financial resources allow and as recommended by Program Advisory Committees, technology is upgraded in classrooms to provide students with training within industry standards.

**3.** Promote accessibility and technology through capital improvements based on universal design principles.

- c.** Work with design team to optimize available space, increase accessibility to current standards, and add modern features.
- d.** Coordinate current and incoming enrollment with construction schedule to maximize facility utilization during renovation phases.

In 2024, the agency completed public restroom renovations to meet ADA specifications. The agency successfully renovated vacant spaces according to the ADA and universal principles, which were occupied by new tenants mid-2024. Other plans to renovate and utilize vacant space have been delayed due to budgetary constraints. Any future purchase of systems, classroom and student life technology will be based on universal design. Every capital project will be assessed and designed by architects fluent in universal design.

### **Goal 5: Increase Usage Opportunities At HGAC/CTI**

**4. Expand outreach to non-traditional referral sources including increase of online presence.**

- a.** Strategize marketing events and efforts to target non-traditional referral sources.
- b.** Strategize use of social media, website, virtual tour and other on-line marketing tools.
- c.** Continue to improve application and payment options for non-traditional students.

The agency implemented an on-line marketing initiative in 2024, which resulted in effective outreach to targeted populations and increased enrollment in CTI programs. Following the campaign, there was an 18% increase in outreach and 47% increase in social media content interactions. Social media strategies have expanded with the addition of an Instagram account, which targets specific populations. The website also went through a redesign in 2024. Recent recommendations from the Commission on Accreditation of Rehabilitation Facilities (CARF) will address information available on the website for potential students.

**5. Expand opportunities for individuals who are blind/visually impaired.**

- a.** Continue to partner with BBVS to evaluate/update current technology and program accessibility.
- b.** Conduct staff training to improve HGAC/CTI service delivery to this population of customers.
- c.** Continue to evaluate satisfaction surveys and feedback from stakeholders.

The agency completed an evaluation of technology and program accessibility in two pilot programs, then purchased new equipment according to BBVS recommendations. The agency also completed training of specialized AT clinicians in the Center for Assistive & Rehabilitative Technology (CART), and with VR Instructors in

programs piloted for BBVS customer pathways. These programs are currently open for enrollment. Additional training for all CTI at HGAC staff is planned for August 2025. The agency continues to plan for training for BEP customers, slated to begin at CTI in January 2026.

- 6.** Expand the availability of services and education offered, including virtual learning opportunities.
  - a.** Continue to conduct feasibility studies and evaluate labor market trends for new training programs and credentials.
  - b.** Continue to research and develop virtual services specific to driver education, vocational assessment, and career preparation.

The agency continues to evaluate labor market trends and program feasibility in relation to enrollment, program costs, job outlook and numerous other factors. Most recently in 2025, attention has been given to the development of the Early Childhood Education program, enrollment in the Nurse Aide program, and transition of several programs to Essential Workplace Skills credentialing. Partnerships with local colleges are in development and expected to expand program offerings for CTI students. Due to budgetary constraints, development of on-line programming has been placed on hold.

### **Goal 6: Increase SE/VR Outcomes**

- 1.** Expand training for CRPs.
  - d.** Identify the most up to date evidence-based practices for SE.
  - e.** Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
  - f.** Monitor efficacy of and outcomes for customers with mental health disabilities.

OVR provided Association of Community Rehabilitation Educators (ACRE) training opportunities to OVR CRPs and shared via OVR's SE Listserv. Funding has been allotted to help contracted partners to increase their staff's credentials, if necessary, within the Subminimum Wage to Competitive Integrated Employment (SWTCIE) grant.

OVR Delivered online and in-person training on Integrated Resource Teams (IRTs) from the National Disability Institute to InVEST Project partners as the SWTCIE model demonstration grant has been implemented on a statewide basis.

OVR provided CRP Supported Employment (SE) Office Hours in 11 of the 12 months for this reporting year. SE Office Hours consist of reviews of services within the SE Policy and Provider Agreement and tools developed for providers to assist with reports and invoicing, and resources such as upcoming Association of Community Rehabilitation Educators (ACRE) Trainings (26 ACRE opportunities shared), as well as resources for online trainings. Additionally, opportunities for open discussions, led by the Supported Employment VR Specialist, were incorporated into SE Office Hours to provide effective best-practices and strategies shared from the providers themselves.

The Supported Employment VR Specialist participated in natural supports training from Indiana University to provide this as a resource to interested CRPs.

OVR has hosted guest speakers during 5 of the 11 SE Office Hours to present to providers, with a focus on the continuum of services and continuity of support. External presenters included Social Security Administration (SSA) Ticket Program Manager (TPM), AHEDD's Administrative Employment Network (AEN), and The Office of Long-Term Living (OLTL) and the 3 Managed Care Organizations. Internal presenters included 2 VR Specialists to discuss the topics of On-The-Job Training (OJT) and Supported Employment, as well as partnering with the local District Office Business Services Representative's (BSRs) to build and maintain employer relationships via supported employment and community partnerships. The Supported Employment VR Specialist continues to work with other State agencies such as the Office of Developmental Programs (ODP), the Office of Long-Term Living (OLTL), and The Office of Mental Health & Substance Abuse (OMHSAS), as well as Social Security Administration (SSA) Ticket to Work (TTW) Program to increase the number of shared Supported Employment Providers.

In January 2025, OVR began to collect SE success stories from providers directly. From January 2025-June 2025, 19 success stories were submitted. Providers were then given an opportunity to share their Success Story during SE Office Hours. Additionally, OVR implemented the SE Provider Presentation Series in October 2024, giving SE providers an opportunity to present their agency, including SE services, other OVR services, highlights and success stories at OVR internal SE Office Hours to staff. Since that time, 30 SE Providers have presented.



OVR participated in Individual Placement and Support (IPS) Leadership Training alongside the PA Office of Mental Health & Substance Abuse (OMHSAS) in an effort to continue to work towards implementation of IPS in the future and will provide information to CRPs.

OVR staff provided a statewide SE refresher training to approximately 300 CRPs.

The OVR Specialist for Mental Health Services attends quarterly OMHSAS

Mental Health Planning Council meetings and discusses OVR related issues as needed.

Over PY2024, the rates for psychotherapy and psychiatric diagnostic evaluations were increased in an effort to become more competitive and increase availability of these services to our customers.

OVR is working with community agencies to provide a mindset shift away from Transitional Employment as an OVR service and is instead encouraging PA Clubhouses to become Work Experience for Adults (WEXA) and SE providers to provide their customers with job coaching and/or work experiences that can lead to Competitive Integrated Employment (CIE). Also, OVR has been working with PA Clubhouse Coalition staff on these efforts, providing technical assistance as needed.

With evidenced-based practices in mind and in an effort to increase opportunities for success and Competitive Integrated Employment for individuals with co-occurring disabilities, OVR participated in Individual Placement and Support (IPS) Leadership Training alongside the PA Office of Mental Health & Substance Abuse (OMHSAS) in an effort to continue to work towards implementation of IPS in the future and will provide information to CRPs.

OVR is in contact with the Re-Entry Bridge Program, which supports Certified Peer Support Specialists with criminal justice system involvement by offering employment guidance, support groups, career coaching, mentoring, and training. Ongoing discussions are planned to determine what type of collaboration may be appropriate.

OVR updated an internal guidance document related to the approval of Certified Peer Specialists in order to provide further clarification on how VRCs can support customers in this endeavor.

OVR is in discussions with OMHSAS to develop an MOU that would allow for data sharing of services and outcomes for shared customers between the two agencies. As part of this initiative, OVR is exploring ways to report on outcome data using primary and secondary impairment codes within OVR's case management system (CWDS).

**2. Expand training for VR staff.**

- e.** Provide staff with training on evidence based best practices for supporting customers in obtaining CIE.
- f.** Support staff through ongoing workshops and in-service trainings to ensure all OVR programming is being discussed with all populations served.
- g.** Monitor efficacy and outcomes of trainings to identify knowledge gaps.

OVR has provided regular office hours and technical assistance opportunities to VRCs, supervisors and SE Coordinators in the following areas:

- Supported Employment
- Work Experiences for Adults (WEXA)
- Business Services
- Pre-ETS
- Transition
- Charting the LifeCourse
- Integrated Resource Teams
- Back-to-Basics (essential VR procedures)

OVR identifies areas in which the field requires training and develops stand-alone trainings and training series to implement statewide. Statewide trainings have included the following topics:

- Business Services Resources & Strategies
- Center for Workforce Information & Analysis
- Charting the LifeCourse
- ODP Enrollment & Waivers
- PA Family Network Services
- Integrated Resource Teams

- Trainings and refreshers on a variety of OVR policies and procedures

OVR also provides staff with opportunities to attend local, statewide, and national conferences and workshops to enhance their knowledge and learn about new innovations and best practices. These opportunities have included:

- International Orientation & Mobility Symposium
- PA Department of Education/Bureau of Special Education Annual Conference
- PA Rehabilitation Association – Professional Development Institute
- Pennsylvania/Delaware Chapter of the Association for Education & Rehabilitation of the Blind & Visually Impaired
- PA Workforce Development Association Conference
- Project SEARCH Annual Conference
- PA Transition Conference
- Rehabilitation & Community Providers Association Conference
- University of Scranton Annual Conference on Disability
- PA Autism Conference
- Apprenticeship PA
- Brain Injury Association of PA Annual Conference
- National Association of People Supporting Employment 1<sup>st</sup> (APSE) Conference
- Charting the LifeCourse Showcase
- Office of Developmental Programs' Everyday Lives Conference

In addition, OVR has instituted a "Monday Minute" email to all staff, covering timely topics and knowledge checks related to Business Services, Supported Employment, and various OVR policies.

4. Conduct outreach to employers to increase CIE.
  - a. Provide employers with disability related work incentives/tax credits/employment supports.
  - d. Educate employers on OVR employer specific services.
  - e. Conduct disability etiquette training, ADAA evaluations, and on-going support during the onboarding process to enhance the relationship between the employer and OVR.

OVR provided training and technical assistance to 1,002 employers, including information on disability-related work incentives such as the Work Opportunity Tax Credit (WOTC), On-the-Job Training (OJT) wage reimbursement, and assistive technology supports. Services were delivered through job fairs, employer phone outreach, accessibility consultations, event participation, job development activities, and ongoing onboarding support. These efforts helped employers understand the financial and programmatic supports available to offset costs and increase retention when hiring individuals with disabilities.

OVR continued to educate employers on services that support recruitment and retention, including Single Point of Contact (SPOC) coordination and direct consultation on hiring and training. The Commonwealth Internship Program in partnership with OA, provides college students with disabilities paid internship experiences within Commonwealth agencies. OVR offers technical assistance and disability awareness training to agency supervisors to ensure that placements are supportive and successful. This initiative is designed to strengthen career pathways into state government employment while preparing agencies to integrate workers with disabilities into their workforce.

Additionally, over 100 employer connections were developed through the MY Work program. This program provides high school students with disabilities paid, community-based work experiences in partnership with local businesses. These employer connections frequently result in long-term partnerships and serve as an entry point for employers to learn more about OVR services, work incentives, and supports.

OVR provided disability etiquette training, workplace accessibility consultations, and onboarding support to 1,002 employers during the reporting year. Trainings were tailored to employer needs and included strategies for fostering disability awareness, addressing workplace barriers, and creating environments where employers feel confident supporting employees with disabilities.

In addition, outreach events organized in collaboration with the First Lady engaged 19 employers statewide, creating opportunities to share OVR services, highlight hiring incentives, and promote strategies for fostering disability awareness. These events strengthened relationships with employers, increased awareness of OVR supports, and showcased success stories from both businesses and job seekers with disabilities. Together with targeted pilots like the DMVA initiative and long-term partnerships developed through

the Commonwealth Internship Program and MY Work, these efforts are building a stronger foundation for competitive integrated employment across Pennsylvania.

OVR onboarded six Designated Employers as part of the InVEST Project, PA OVR's SWTCIE Model Demonstration Project.

- Funding two embedded positions to support InVEST Project participants hired through the grant.
- Providing 100% Wage Reimbursement for first calendar year of employment for individuals hired by designated employers.

A presentation on InVEST Project and OVR Employer Services was conducted at the United Employer Symposium at Villanova University and the PA Food Merchants' Association Spring Conference.

**(2) Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and**

OVR's performance indicators for Program Year 2024 are as follows:

1. Employment Q2 After Exit – \_\_\_% (RSA's goal as established in the State Plan is 62%)
2. Employment Q4 After Exit – \_\_\_% (RSA's goal as established in the State Plan is 57%)
3. Median Earnings Q2- \$\_\_\_\_\_ (RSA's goal as established in the State Plan is \$5850)
4. Credential Attainment (CA) – \_\_\_% (RSA's goal as established in the State Plan is 22%)
5. Measurable Skill Gains (MSG) – \_\_\_% (RSA's goal as established in the State Plan is 41%)

**\*\*NOTE\*\*** PY2024 performance indicators were not finalized with RSA in time for publication of first draft. Expected to be available in October 2025.

**(3) The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).**

No funds were used to purchase **RSA-defined** I&E activities during PY 2024 according to sections 101(a)(18) and 101(a)(23). However, OVR will evaluate the necessity of reserving I&E funds related to the provision of direct services to customers based on needs identified in the CSNA.

**(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

**(1) Acceptance of title VI funds:**

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

(B) ☐ VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

**(2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the SE program.**

Title VI funds will be used to provide SE services under the WIOA definition to eligible participants of the VR program. At least 50% of these funds will be used to provide SE to youth with disabilities; however, it is OVR's intention to devote up to 100% for this purpose if there are sufficient numbers of appropriate youth participants. Adults with disabilities will be served with any remaining funds available after youth have been served using these funds. All services provided using title VI funds will operate under the same guidelines as SE services provided under title I.

**(3) SE services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.**

OVR provides SE services to Pennsylvanians with disabilities, including youth up to age 25, through a network of Community Rehabilitation Programs (CRPs). Services provided through these vendor partners are described below.

**Background**

OVR completely overhauled its SE policy and procedures from 2016-18. Changes were brought about by recommendations of an SE workgroup and new regulations stemming from WIOA, and included a revision of the milestone payment approach that was in place to a fee structure corresponding to a customer's job stability, a move from Letters of

Understanding (LOU) with CRPs to an SE Provider Agreement, the inclusion of Discovery/CE in the SE policy, the addition of new SE services to better meet the diverse support needs of OVR customers, and an enhancement of extended services to align with WIOA regulations and improve long-range outcomes. The entire SE process, from referral to reporting and invoicing, was moved to a computerized system which was rolled out July 1, 2018. As of October 2023, there are 173 approved SE providers (an 11% increase from August 2021), with 30 providers approved to render Discovery/CE services (17% increase).

### **Quality Standards**

- OVR utilizes a broader case review process to ensure that counselors are providing services in accordance with policy and procedure. This covers the general oversight of providing SE services.
- OVR's electronic case management system has business rules in place to ensure that all reporting and documentation related to the provision of SE services are being conducted according to policy, thus helping to ensure quality standards.
- Current OVR SE policy requires that CRP staff have minimum credentials including Certified Employment Support Professional (CESP), Association of Community Rehabilitation Coordinators (ACRE), and Certified Rehabilitation Counselor (CRC), in order to provide SE services to ensure quality service provision.
- OVR provides extensive, ongoing training and technical assistance for internal staff and CRP staff on the SE policy and procedures. Trainings are offered in-person and virtually through webinars, video conferences and conference calls.

### **Scope and Extent**

SE services include assessment, planning/coordinating, job customization, placement, coaching, mentoring, and retention. All services are provided on an individualized basis and specific vocational goals are determined by the individual's needs and preferences. Populations receiving SE include individuals with developmental and intellectual disabilities, mental illness, physical disabilities, blindness, deafness, autism and traumatic brain injury. SE services are also available within the special education, mental health and developmental disability service systems. OVR is actively engaged in collaborative relationships with these systems to ensure the provision of effective services, to reduce duplication of efforts, to share resources, and improve employment outcomes for those mutually served by multiple systems.

In PA, sources of funding for extended services are available to ensure long-term supports for those who require them. For example, Office of

Developmental Programs (ODP) and Office of Long-Term Living (OLTL) have funding for extended services for those customers who receive Medicaid through these agencies. Actual funding available from ODP and OLTL varies from county to county. OVR also has a limited amount of funds through state VR money for customers who do not have other sources of long-term funding. Other resources that can be used for extended service funding are natural supports, SSA work incentives, and private foundations.

The determination of an individual's need for extended services begins during the initial assessment phase of a case. At that time, the rehabilitation team – the customer, the customer's family, OVR staff, Case Manager/Supports Coordinator (if applicable), and others – determine possible long-term support needs and resources. As the case progresses, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are generally considered job stable and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place. For those at 80% or lower independence on the job, there is an expectation of need for continued coaching and extended support services. If no other source of funding is available for the individual, OVR can provide extended services up to 24 months for adults using only state appropriated funds and 48 months for students with disabilities using federal VR dollars. Regardless of alternative funding source, OVR continues to serve individuals for a minimum of 90 days after transitioning to extended services. For those individual's with ODP funding, OVR has a joint agreement that dictates when the case can move to ODP-funded extended services and documentation requirements.

**(4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide SE services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(C)(19)(v).**

As mentioned above, OVR has coordinated with other State offices such as ODP and OLTL. Preliminary meetings were held with Office and Mental Health & Substance Abuse Services (OMHSAS) to discuss a coordinated approach to bringing the Individual Placement and Support (IPS) and other entities to provide SE services and extended services. In February 2019, a joint bulletin between OVR and ODP was issued outlining referral processes for SE cases in which a customer is eligible for OVR services and waivers through ODP. OVR will continue to communicate and collaborate with these



offices to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to state offices and other entities to ensure the provision of services and extended services.

OVR will continue to support the provision of quality SE services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

**(f) Annual Estimates.**

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

**(1) Estimates for next Federal fiscal year—**

**(A) VR Program; and**

Priority Category (if applicable)	No. of Individuals Eligible For Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Cost Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	36,180	36,180	\$56,000,000	N/A
Significant Disability	4,620	4100	\$5,900,000	520
Individual With A Disability	230	0	0	230

**(B) Supported Employment Program.**

Priority Category (if applicable)	No. of Individuals	No. of Eligible Individuals Expected to	No. Receiving Services using Title I	No. of Eligible Individuals Not
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	Eligible for Services	Receive Services under Supported Employment Program	and Title VI Funds	Receiving Services (if applicable)
Most Significant Disability	1630	1630	\$6,800,00	N/A
Significant Disability	0	0	0	0
Individual With A Disability	0	0	0	0

**(g) Order of Selection.**

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

☒ The VR agency is implementing an order of selection with one or more categories closed.

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

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

**(1) For VR agencies that have defined priority categories describe—**

**(A) The justification for the order;**

The Rehabilitation Act, as amended, requires that the state agency determines when the utilization of an Order of Selection (OOS) for services is necessary based on the lack of available resources (funding and staffing) impedes the agency from providing services to all eligible individuals. The OOS in PA gives priority first to individuals with Most Significant Disability (MSD); second to individuals with Significant Disability (SD); and third to individuals with a Disability (D).

In spring of 2024, PA OVR was notified that the national VR program was being flat funded at the federal level for Federal Fiscal Year (FFY) 2024 and was likely to be flat funded again for FFY 2025. Based on rising costs throughout the program in personnel and service provision and a steady increase of new adult and student customers, it was determined that OVR's available and projected resources may not be adequate to ensure the provision of the full range of VR services to all eligible individuals moving forward as described in more detail below.

PA OVR is committed to supporting individuals with disabilities in achieving employment goals through tailored vocational services. Following the pandemic, PA OVR has observed a substantial increase in both service demand and expenditures, necessitating a reevaluation of the agency's Order of Selection (OOS) categories, particularly the D and SD categories. As service demands have grown, the agency is facing financial constraints that impact its ability to serve all eligible individuals effectively. According to the Program Year (PY) 2023 Q4 RSA Data Dashboard, OVR had 2,995 individuals in the SD category and 158 in the D category. With the majority, 32,000 in the MSD category. By closing the SD and D categories, combined with a definition change for MSD, we believe we can start to reduce costs and manage down the spend through FFY 2025 while still serving those with the most significant needs while we work across all aspects of the program to reduce costs through cost conservation, policy changes, and hiring restrictions. Over the past two years, PA OVR has repeatedly answered RSA's call to invest funds, support customers, create partnerships, and improve the timeliness of services. Unfortunately, flat funding combined with the onslaught of new adult VR and Pre-ETS students necessitated the reimplementation of the OOS in PA in accordance with CFR361.36, along with other difficult staffing and programmatic decisions. Rising costs throughout the agency and the lack of the annual cost of living adjustment (COLA) has set off a chain of events that can only be contained through a reduction in programmatic costs and customers served by utilizing the OOS.

On April 21, 2025, PA OVR was notified it would be receiving the previously unexpected COLA for FFY 2025. With this additional funding PA OVR was able to begin a rolling release of wait listed cases from the SD category on July 1, 2025, starting with cases that completed applications through February 2025. Wait list cases will be evaluated monthly but may not be released each month. The decision to release cases will depend on factors such as staffing, reallocation, and other future budget information.

### **Customer Services**

Following the pandemic, PA OVR mandated in person outreach activities and a return to group and individualized Pre-ETS services. As a result, we have

seen a growing awareness and utilization of PA OVR services among individuals seeking support for employment and those seeking Pre-ETS.

### **Vocational Rehabilitation**

For example, during PY 2023, PA OVR saw an additional 4,307 individuals found eligible for services, and an additional 4,273 new Individual Plans for Employment compared to PY 2022. According to the PY 2023 Q4 Data Dashboard, there are over 35,000 active cases in the VR program. Last FFY, PA OVR invested \$72.7M in VR services. Coming out of the pandemic, PA OVR had significant carryover and followed the advice of RSA to do outreach, update policy and procedures, and find flexibilities in service provision modalities to ensure that customers are being served timely and effectively and that funds were invested into customer services. As a result, PA OVR has increased its eligibility and plan development times to 95% and 97.3% respectively according to the PY 2023 Q4 RSA Data Dashboard. We also expanded our state mandated Financial Needs Test policy and our Post-Secondary Education Formula to be able to serve more customers and provide more financial assistance. Due to flat funding, those policy exemptions for the FNT and Post-Secondary Education expired on July 1, 2024, as part of our overall cost containment strategy. The number of customers seeking services has steadily increased over the last eight quarters as indicated by the RSA Data Dashboards and with federal funding concerns we are no longer able to keep up with demand in the VR program and the OOS will need to be re-implemented in FFY 2025.

### **Pre-ETS**

PA OVR serves a significant number of high school students with disabilities who have Individualized Plans for Employment (IPEs) due to requirements and best practices outlined in the Workforce Innovation and Opportunity Act (WIOA). WIOA emphasizes that the optimal time to open a VR case is when a student is ready and available to engage in activities necessary to establish a competitive, integrated employment goal. These activities include developing an IPE and participating in VR services to achieve employment. Therefore, the timing for opening a case is unique to everyone, and in some cases, it may be appropriate for students to develop an IPE two or more years prior to graduation or exiting high school. This is especially true for students requiring complex support needs such as intensive work-based learning experiences like Project SEARCH or OVR's signature summer WBLE program - MY Work, sign language interpretation, or low vision equipment, which are only available through an IPE. Opening a VR case earlier ensures these supports are in place for participation in Pre-ETS and facilitates a seamless transition to adult services. As a result, of the 32,236 current

students with active IPEs, 15,828 (49%) fall within the age definition of a Pre-ETS student. OVR has previously chosen to open cases on students when they are participating in more intensive and high-cost services like WBLE or when they have complex or multiple disabilities where VR services after secondary education will be necessary. Otherwise, Pre-ETS are provided under the potentially eligible (PE) process (mostly in small groups) and a VR case is not created for those students.

PA OVR's Pre-ETS minimum reserve requirement is around \$21.7M annually (based on flat funding), which will be exceeded due to having carryover and reallocation funds. In PY 2024 the demand for Pre-ETS in PA is substantial with over \$31.6M invested in services alone. In PA there are over 500 public school districts and 160,000 students with Individualized Education Programs (IEPs) age 14-21 and PA OVR is tracking over 50K Pre-ETS eligible students. OVR saw an increase of 1,776 total unique student receiving services, while year over year quarterly totals have seen a 66% increase (or 11,979 total Pre-ETS provided) for the entire year compared to PY 2022. According to the PY 2023 Q4 RSA Data Dashboard, OVR delivered 18,870 services to 12,822 students. PA OVR does a great job investing in our student population with over 1,200 paid work-based learning experiences occurring just this past summer through our MY Work program. However, this level of increase is simply unsustainable for an agency of our size and our federal grant award, let alone after being flat funded and the potential to be flat funded into the future. As a result, we have issued all new guidance for FFY 2025 reducing the length of programs, limiting the number of hours for specific services, and implementing a continuum of services for students to reduce costs that focuses on more intensive and costly services near the end of the secondary school experience. These changes will take time to have the desired fiscal impact and further supports PA OVR's need to reimplement the OOS as soon as possible.

### **Community Rehabilitation Providers (CRPs)**

PA OVR increased Supported Employment rates to align with the Office of Developmental Program (ODP) several years ago, however, ODP increased their rates again recently and if we would align with those new rates, we would estimate needing another \$1.8M to cover those costs. We have chosen to hold on increasing these rates at this time until we learn what the federal and state budget will have in store for PA OVR. Psychological service rates were increased this past summer. Our rates had grown stale after almost ten years without an increase and we were losing vendors, so we updated service definitions and rates to align with current market conditions and would expect costs to increase over the next year as those new rates and service definitions are utilized.

OVR's Pre-ETS rates are currently competitive and as a result of more and more students seeking services and flat funding there is no plans to increase them further.

## **Personnel**

OVR's largest expense is personnel, last year PA OVR spent \$80.3M in salary and benefit costs (including \$7.5M in Pre-ETS Personnel). With raise and benefit costs continuing to escalate, PA OVR will be unable to fill all available complement positions. PA currently has 309 filled counselor positions, and we are currently restricting hiring to lower costs and allocate more funds for direct services. As of 11/1/2024, PA OVR had 101 total vacancies in the agency. Although we are being strategic in hiring and allowing some positions to be filled out of necessity, we remain concerned that due to rising costs we have reached a tipping point where in areas of PA we will have insufficient resources to continue to manage the referral volume in VR and Pre-ETS. Of the 101 total vacancies, 48 of those complement positions are counselor vacancies that cost \$125K each (salary/benefits) which would be an estimated additional cost of \$6M if those positions were to be filled. With an average caseload of about 110 individuals, OVR total open cases could rise another 5,000 customers which would overwhelm our fiscal capacity for purchased services and necessitate additional program cuts and restrictions. Last year, around 57% of cases received a cost service at an average of \$4K dollars each. If those 48 counselor positions were filled and 57% of the estimated 5,000 customers received a cost service that would add an estimated \$11.4M to our service provision model. As a result, the OOS is a necessary component of our cost containment strategy while we wait on federal budget approvals.

## **Operations/Administration**

PA OVR is working to reduce our administration costs by reviewing all physical locations and shrinking space significantly as leases expire. Unfortunately, this will take time as not all leases are set to expire in the immediate future. Our administration costs, specifically those costs through our shared services – OIT, HR, Legal, etc. are rising as all of those costs are directly tied to personnel increases that were awarded by the commonwealth previously. PA OVR also recently approved an increase in costs for our maintenance contract for our CWDS Case Management System that tracks all federal reporting and case expenditures. In total, OVR's operations costs were \$34.5M last FFY and we would expect a similar amount in the current FFY.

## **Hiram G. Andrews Center (HGAC)**

Finally, OVR is one of the eight remaining states that offer a Comprehensive Rehabilitation Facility. OVR's Commonwealth Technical Institute (CTI) at the

Hiram G. Andrew's Center (HGAC) offers eleven education programs in a fully accessible, barrier free environment. CTI at HGAC offers a unique learning opportunity in a fully accessible and supportive environment that allows a student population with diverse and complicated disabilities to be successful compared to other post-secondary opportunities that they considered through the informed choice process when selecting CTI as their training vendor. Although many disability groups are represented by the student population the primary categories are cognitive at 47% and psychosocial at 32%, with 70% of the student population have a secondary diagnosis, and a smaller population with a third diagnosis. The primary disabilities of the population are Autism (31%), Intellectual Disability (12%), and Specific Learning Disability (12%). These categories/disabilities are often complex and require additional supports that would not be offered at traditional post-secondary education institutions. CTI at HGAC offers a variety of supports including individual and group counseling, assistive technology evaluations, educational program accommodations, and many other individualized supports that allow the students to be successful. Without the unique support services offered by CTI at HGAC and the ability to customize the learning experience many of these students may not be able to successfully complete a post-secondary program.

HGAC has endeavored to improve programs and has for the most recent cohort of graduates achieved a 76% placement rate. HGAC's success comes with a significant cost with nearly \$25M in total funds (\$19M used for personnel) necessary to manage the facility and pay for the 160 staff that operate the facility 24/7/365. PA OVR supports the programs offered by HGAC and we have created a variety of public/private partnerships that allow our students to participate in work-based learning prior to graduation which is a direct reflection of our 76% placement rate for last year's cohort.

**NOTE** - HGAC costs are tracked separately from our operations and personnel costs.

CTI at HGAC prepares Pennsylvanians with disabilities for the careers they want with individualized, affordable education, training, and vocational rehabilitation services, to contribute to our workforce in a meaningful way. CTI has served an average of 163 students per term in Calendar year 2024, with a high of 173 students in the Fall 2024 term. The 173 students served by CTI in the Fall 2024 term account for 91% of CTI's operational capacity. Per term, CTI has maintained an 86% retention rate, a 78% graduation rate and a 76% rehabilitation rate (employed or continued higher education) from 2021 to 2023. CTI has seen an increase in the number of students who graduate from CTI. CTI has averaged 53 graduates per term in 2024, with a high of 62 graduates in the Fall 2024 term. CTI averaged 33 graduates per term in 2022 and 32 graduates in 2021. Over the same three-year period CTI students earned 630 credentials ranging from ServSafe Food

Handler, OSHA 10, Adult CPR/AED, Microsoft certifications, associate degrees, welding certification in flux and gas, warehouse power equipment, PA Automotive Inspection, IT Networking, medical assisting, and a variety of others. CTI at HGAC is continuing to create business partnerships in the local community to offer valuable externships to CTI graduates. Currently, 35 graduates have engaged in post-graduation externships since the inception of this program in 2022. This number is expected to rise as business partnerships are created and maintained with Career Services and Education staff. CTI at HGAC has increased their hourly wage after graduation from \$13.94 in 2022 to \$15.92 in 2023 to \$16.61 in 2024. CTI support programs have also seen an increase in the number of students served on a year-to-year basis. Center for Occupational Readiness (COR) served 164 students in 2024, up from 100 in 2023. Cognitive Skills Enhancement Program (CSEP) served 28 students in 2024, up from 22 in 2023. Evaluation served 352 students in 2024, up from 266 in 2023. CTI hosted 18 students for Pre-ETS services, including CREATE and Pre-ETS Academies in 2024. The Center for Assistive and Rehabilitative Technology (CART) services served 275 standalone evaluations per term in 2024, as they continued to support active CTI students.

### **Program Income**

OVR routinely seeks program income through the SSA Reimbursement process. Annually we anticipate receiving around \$9M in program income. However, recently SSA has been returning claims or denying cost reimbursement making future projections difficult. OVR uses program income to supplement the Independent Living Older Blind (ILOB) program. For ILOB we are in the process of reducing program costs in that program as well by restricting the number of hours of service a customer can receive and capping the amount of equipment that can be purchased. Any remaining program income funds is used to support costs within the VR program. These estimates are factored into our overall cost projections for the year and any significant decline in program income would further negatively impact our operations.

### **Summary**

With a flat funded federal grant of only \$144M our program is on a path to unsustainability once we have utilized available state funds (\$48.7M), reallocation, SSA reimbursement, and the remaining federal carryover funds from the prior year. OVR believes we will be able to reduce the costs of services through the remainder of FY 2025 by reducing the amount of funding available for post-secondary education, reverting our financial needs test to pre-pandemic levels, re-prioritizing Pre-ETS by creating a continuum of services, and restricting hiring and administrative costs. PA OVR is looking to cut expenditures by over \$20M in FFY 2025, targeting a total budget of



\$230M and a total of \$215M for FFY 2026. To reach these budgetary goals, it will be necessary to reimplement the OOS, close the SD and NSD categories, change the definition for MSD and SD, and then monitor our costs saving measures to determine if closing the MSD category will be necessary moving into FFY 2026. Flat funding in FY 2024 and potential flat funding in FFY 2025 and a lack of available federal reallocation funds has created a financial issue for PA OVR that will need to be managed carefully and by using every available tool, including the OOS. With the threat of flat funding and an unknown federal budget, the ability to plan programs becomes impossible and has put added stress on our staff and our vendor community. OVR will have to continue to reduce programs over the next several FFY cycles to ensure that we stay within flat funding projections. By closing the NSD and SD categories within the OOS, PA OVR aims to ensure that limited resources are directed to those who are most in need, while still maintaining quality services within the framework of available funding.

OVR asked for, and received approval from, the Pennsylvania Rehabilitation Council on August 15, 2024, and the Pennsylvania State Board of VR on September 12, 2024, to investigate reinstating the OOS, update the definitions of the priority categories, and give priority to customers at immediate risk of losing their employment.

Upon final approval from RSA:

1. OVR will close the SD and NSD categories and establish a waitlist for those categories to prioritize services to the MSD category, with a target date of February 1, 2025, pending any necessary updates to the Commonwealth Workforce Development System (CWDS). OVR will continue to monitor the fiscal outlook on an ongoing basis and will reserve the option to also close the MSD category if determined fiscally necessary.
2. For the definition changes as described below to MSD and SD, once RSA approves, PA OVR will work to make appropriate system updates and train staff with a target date of implementing the definition changes at the start of the PY 2025 (July 1, 2025). As part of the definition changes, the NSD category will be renamed as: Individual With A Disability (D).

**(B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and**

**First Priority:** Most Significant Disability; **Second Priority:** Significant Disability; **Third Priority:** Individual With A Disability.

**Description of priority categories**

**First Priority: Most Significant Disability**

- The physical, mental, or sensory impairment(s) must seriously limit four or more of the individual's functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and
- the individual must be expected to require two or more VR services that are expected to last six months from the date of the Individualized Plan for Employment (IPE) or be needed on an ongoing basis to reduce an impediment to employment.

**Second Priority: Significant Disability**

- The physical, mental, or sensory impairment(s) must seriously limit one to three of the individual's functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and
- the individual must be expected to require two or more VR services that are expected to last six months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

**Third Priority: Individual With a Disability**

- The individual has a physical, mental, or sensory impairment that does not meet the definition for Most Significant Disability or Significant Disability.

**(C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.**

OVR's outcome and service goals are projected as follows for **FFY 2025**:

1. For the Most Significant Disability category, the number eligible is expected to be approximately 32,000, with all expected to be served unless it becomes necessary to close the MSD category.
2. For the Significant Disability category, the number eligible is expected to be approximately 3,000 and upon implementation of the OOS individuals in this category who are not in plan status will be moved to a wait list.
3. For the Individual With A Disability category, the number eligible is expected to be approximately 150, and upon implementation of the

OOS individuals in this category who are not in plan status will be moved to a wait list.

New customers determined eligible and assigned to a closed priority category will be placed on a wait list until the resources are available to provide the full range of services. OVR will continue to provide pre-employment transition services to potentially eligible students and OVR eligible students who began receiving them prior to eligibility determination and placement in a closed OOS priority category.

Individuals applying for services after the date the OOS is closed will be interviewed and their eligibility and OOS determination will be made. Eligible customers will be placed on a wait list per category. When financial resources are available, first priority will be given to customers with a Most Significant Disability, second priority to customers with a Significant Disability, and third priority to customers that are Individual With A Disability. Rationale for placement will appear in the customers case file.

Each customer placed on a waiting list will be notified in writing of the priority categories, as well as his or her assignment to a particular priority category classification and will be informed to alert OVR regarding possible reclassifications due to a change in their circumstances or due to any misclassifications. The individual will also be informed of their right to appeal the category assignment through informal or formal review and of the availability of assistance from the Client Assistance Program.

For eligible customers who do not have approved IPEs with an effective date prior to being placed on the wait list and are not in an open priority group:

1. Information and referral services will remain available. Individuals will be given information and referrals to other appropriate Federal and State programs, including programs carried out by other components of the Statewide Workforce Development System, such as the one-stop centers known in the commonwealth as PA CareerLink, best suited to address the specific employment needs of the individual.
2. No IPE will be written to provide such services to these individuals until such time as their OOS category opens, and they receive notification OVR can serve them.

### **Job Retention:**

Any applicant who has been determined eligible due to their disability, is in immediate risk of losing their job due to their disability and is determined to be in a category not currently being served, may only receive the services or goods needed to maintain the job.

1. The job must be in a competitive integrated setting. If services are needed for other purposes, they may not be delivered, and the

applicant must wait until their name is removed from a wait list category and placed into active service. This means that if the individual needs services that are not directly tied to maintaining current employment, the individual's ability to receive those services from the VR program depends on the individual's placement on the wait list.

2. **Immediate risk** means that the individual would almost certainly lose their current job if not provided specific services or equipment in the very near future that would enable them to retain that employment.
3. Immediate risk of losing the job due to the disability does not include economic conditions and non-disability related factors.

#### **Procedure for processing applications:**

1. Upon receipt of referral, counselor meets with applicant to complete application and inform them about OOS and resources that can assist them while they are on the wait list.
2. Counselor will input data and application date, scan and upload documents in OVR's CWDS database systems, and determine eligibility within 60 days of the date of application.
3. After eligibility determinations are made, customers will be assigned to an OOS priority category based on their functional limitations and need for multiple VR services over an extended period of time (currently defined as six months or more).
4. CWDS will add the case to a wait list in the system, not allowing services to proceed. Notice of such (as outlined above) will be sent to the customer.
5. Information and Referral- providing information and referral services for all customers placed on the waiting list is a mandatory component of the utilization of the OOS. PA will reinforce and accomplish information and referral through a variety of means. All staff will be trained on the requirements of information and referral when a customer is placed in a closed OOS category as OVR roles out its OOS training and guidance upon approval of the State Plan amendment by RSA. Staff will be reminded of the most common services that might be beneficial to customers in a closed category such as the Client Assistance Program (CAP), PA CareerLink, Centers for Independent Living (CILs), PA Associations of the Blind (PAB), the Assistive Technology Lending Library (ATLL), the PA Assistive Technology Foundation (PATF) and other disability support programs offered through other commonwealth entities such as the Department of Human Services – Office of Mental Health and Substance Abuse

Services (OMHSAS), Office of Long-Term Living (OLTL) and Office of Developmental Programs (ODP), the Department of Education – Bureau of Special Education (BSE), and the Office for the Deaf and Hard of Hearing (ODHH). The CWDS case management system will automatically generate a letter (that will be mailed and available online through the CWDS Customer Portal) to all customers placed in a closed OOS category. The letter will at minimum provide CAP contact information and PA CareerLink information. The system generated letter also allows for custom text to be added to each letter that OVR staff can use to add additional information that is customized to the customers individualized needs and based on where they live. Customers may also contact their counselor or the office at any time for additional information about other services that might be available to them in their area of residence.

The generated letter will contain the following language:

“We are pleased to inform you that based on the information you provided during our initial interview and other documentation received, you have been determined eligible to receive services from the Office of Vocational Rehabilitation (OVR).

When OVR does not have sufficient funds to provide services to all eligible individuals with disabilities, OVR is required by Federal law to provide services according to an Order of Selection. An Order of Selection gives priority to individuals with the most significant disabilities. The significance of disability is determined through an assessment of functional limitations related to employment and the need for multiple services over an extended period of time.

OVR’s Order of Selection places all eligible individuals into one of three priority categories as follows:

- PRIORITY CATEGORY I: Individuals with Most Significant Disabilities (MSD)
- PRIORITY CATEGORY II: Individuals with Significant Disabilities (SD)
- PRIORITY CATEGORY III: Individuals with a Disability (D)

You have been placed into the following Order of Selection Category: Significant Disability (SD), which is a category we are unable to serve at this time.

As OVR continues to evaluate available resources, OVR will serve customers in priority order as funds become available. I will notify you as soon as your Priority Category opens where I can then provide services to you.

If you do not agree with your Order of Selection priority category assignment, you may discuss your concerns with me or my supervisor. If you still have concerns, you have the right to file an appeal in writing within 30 days to: Director, BVRs or BBVS, 651 Boas Street, Room 700, Harrisburg, Pa. 17121. Your letter should indicate what action you are appealing and the remedy you are seeking. If you do not file the appeal within 30 days of the date of this letter, your appeal may not be considered.

**CLIENT ASSISTANCE PROGRAM (CAP) INFORMATION:** If you have questions or concerns about OVR services, CAP can help. CAP is a federally mandated program that provides assistance and advocacy to applicants for and recipients of OVR services. CAP is not a part of OVR, and services are provided at no cost to its client. Contact CAP by: phone at 215-557-7112 (voice/711Relay) or 888-745-2357 (voice/711Relay); fax at 215-557-7602; email at [admin@equalemployment.org](mailto:admin@equalemployment.org); submitting an inquiry on the CAP website at <https://equalemployment.org/>; or mail to Client Assistance Program, 101 Greenwood Avenue, Suite 470, Jenkintown, PA 19046. CAP contacts are kept confidential.

In the meantime, your local PA CareerLink® may be able to assist you with your employment needs. PA CareerLink® provides job search assistance, training opportunity exploration, career counseling, and a variety of employment workshops and job fairs. For more information, visit <https://www.pacareerlink.pa.gov/>.

{Custom text here tailored to the specific needs of the customer.}

Sincerely,

(VR Counselor name)"

**Procedure for putting customers on the wait list:**

1. For each priority category, customers will be put on the wait list based upon application date.
2. OVR Central Office will maintain this list through CWDS.

**Procedure for taking customers off the wait list:**

1. OVR will determine when to open each category based upon financial availability and evaluate the ability to open categories quarterly. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category.
2. A monthly list will be generated by CWDS listing all customers in each category of the OOS. If OVR is unable to serve everyone in a specific category, customers will be taken off the list by month of application

starting with the customers who have been waiting the longest to receive services. The number of customers able to be served will be evaluated on an ongoing basis (no less than quarterly) by the availability of funds and staffing capacity.

3. Notice will be provided to district offices that they can begin developing plans for customers in a certain range of dates, based on the application date.
4. The District Administrator in each district office will ensure customers are assigned to counselors.
5. Counselors will complete an IPE within 90 days of the date the customer was taken off the wait list.

**Procedure for re-opening priority categories:**

1. Currently PA OVR does not have a projected timeline for reopening all priority categories. OVR Central Office will monitor the fiscal outlook on a quarterly basis and evaluate PA OVR's ability to serve all customers based on available state and federal funding and our ability to reduce costs throughout the program.
2. Upon determination that the budget can support increased customer numbers from the closed categories, PA OVR will open the next category, Significant Disability (SD). After that, if funding continues to be available to support increased customer numbers, OVR would open the third category, Individual With A Disability (D).

**(2) Has the VR agency elected to serve eligible individuals outside the OOS who require specific services or equipment to maintain employment?**

☒ Yes

☐ No

**(h) Waiver of Statewideness.**

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

OVR requests a continuation of its waiver of statewideness for its Intergovernmental Agreement (IGA) with the School District of Lancaster (SDoL). Through this program, transition age students with disabilities are provided with enhanced activities and services that lead to employment or career-related postsecondary education or training.

An IGA was developed between SDoL and OVR to provide school-to-work transition services for OVR eligible students with disabilities enrolled in education supports at SDoL. The IGA was approved by SDoL and signed by the school's authorized representative. SDoL provides 21.3% of project funding which serves as the required local/state match. OVR provides the remaining 78.7% from federal VR funds.

The IGA provides SDoL with funds to create two programs, named "Employability and Career Readiness" and "College and Career Readiness." The IGA allows for joint funding (including salary & benefits) of three positions which did not previously exist at SDoL:

1. Program Coordinator (Professional)
2. Vocational Special Education Teacher (Professional)
3. Job Trainer (Paraprofessional)

These two programs provide two separate paths for Pre-Employment Transition Services (Pre-ETS). Pathway One is identified as "Employability and Career Readiness," and Pathway Two is identified as "College and Career Readiness."

### **Pathway One – Employability and Career Readiness**

A minimum of 120 OVR eligible and potentially eligible students with disabilities received employability skills, career readiness training and transition services.

1. Increased Employability and Career Instruction - Teachers are using the Life Centered Education Curriculum from CEC. Additional resources and curriculums were added.
2. Increased work simulations opportunities and projects in the classroom and building setting with a minimum of 10 new simulations and across students of multiple programs and level of need.
3. Continue to connect students to agency and transition services.

A minimum 45 OVR eligible students with disabilities will participate in at least one form of paid work experience. The following locations provide opportunities for paid work experiences.

1. School District of Lancaster - Student Employee Program was successful



**2. Thaddeus Stevens**

**3. Marriott/Lancaster County Convention Center**

A minimum of three employee partnerships to provide small group training and a minimum of three employee partnerships for individual high need student cases. An employee partnership is an agreement between the SDoL and/or agency providers such as OVR, along with a community employer to provide students various levels of employment experience/opportunities such as On-the-Job Training (OJT).

20 students with disabilities received job readiness and employment skills support. Eight students obtained post-graduation competitive employment.

- 1.** In the school setting with limited community opportunity;
- 2.** 15 OVR eligible students with disabilities shall be placed in Competitive Integrated Employment (CIE) consistent with their Individualized Education Program (IEP).

**Pathway Two - College/Career Readiness Transition**

This pathway includes classroom-based instruction related to college/career readiness skills and participation in a part-time college campus experience. Daily instruction and coaching is provided on a college campus for two hours per day through the duration of one college semester with the use of a vocational special education teacher. A minimum of 10 eligible students with disabilities receive college/career readiness training and services annually.

Statewide replication of these programs could provide OVR with opportunities to braid funding, address the needs of OVR eligible students with disabilities, and to collaborate with Pennsylvania Department of Education (PDE) and Department of Human Services (DHS) more effectively.

OVR, as the designated State unit, approved each proposed service before it was put into effect, as demonstrated by a fully executed IGA between the parties and following guidance in the OVR Fiscal Procedures Policy. Based upon 34 CFR §361.50 and OVR Fiscal Policy guidance, the OVR Executive Director or their designee also conducted a rate review of these inter-agency agreements to determine appropriate rates. These agreements are available for review, by year, upon request.

OVR approves each proposed service before it is provided by requiring SDoL to submit budgets listing service costs for pre-approval. The IGAs were drafted to state that the parties to the agreements shall provide the services as specified and described in Appendix A of each of the Agreements, consistent with the submitted budgets as described in Appendix B of said Agreements. These terms are continued after the first-year term of the IGA, when the renewal process of the IGA requires the provider to submit statements of work including descriptions of the proposed services, a

timeline for the provided services, and expected student outcomes, which OVR then approves or requests revisions on, prior to the execution of the renewal. Further, since the budgets are proposed and approved prior to the provision of the services, any changes to service provision must be requested by the provider and approved by OVR prior to implementation.

**(i) Comprehensive System of Personnel Development.**

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

**(1) Analysis of current personnel and projected personnel needs including—**

**(A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;**

**(B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and**

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

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VRC (includes VR Counselors for Deaf & Hard of Hearing)	305	370	65

Vision Rehabilitation Therapist	17	19	2
Orientation & Mobility Specialists	12	16	4

**(D) Ratio of qualified VR counselors to clients:**

The ratio of qualified VRCs to clients with an active rehabilitation plan as of September 2025 was 1:119.

**(E) Projected number of individuals to be served in five years:**

OVR projects that in the next five years, approximately 50 VRCs will become eligible to retire. This will be an average of 10 VRCs retiring per year, in addition to an unknown number of VRCs who leave as part of general turnover. Additional numbers of new VRCs may be needed due to promotions into management positions. If the number of customers seeking VR services remains the same, or slightly increases or decreases, OVR projects that an average of 15-20 new VRCs will need to be hired per year over the next 5-10 years. OVR realizes the need for continued recruitment and training of qualified personnel. Succession planning is a necessary part of OVR's preparation to address projected hiring needs and is included within the annual analysis of qualified personnel needs and personnel development.

**(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:**

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

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Pennsylvania State University	Prior Program: Clinical Mental Health and Clinical Rehabilitation (dually accredited by CACREP)	2	12
The University of Pittsburgh	No longer has a Clinical Rehabilitation Counseling program	N/A	N/A
Penn West University (Edinboro University of PA)	No longer has a Clinical Rehabilitation Counseling program	N/A	N/A
The University of Scranton	Clinical Rehabilitation Counseling	24	3

**Note:** Pennsylvania State University, The University of Pittsburgh, and Penn West University no longer offer CACREP-accredited Clinical Rehabilitation Counseling programs.

- Pennsylvania State University currently offers a Clinical Mental Health Counseling program (Clinical Mental Health and Rehabilitation in Schools and Communities).
- The University of Pittsburgh and Penn West University also currently offer Clinical Mental Health Counseling programs.

**(B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from**

## **minority backgrounds and personnel who are individuals with disabilities.**

### **OVR Counselor Recruitment**

In April 2025, Commonwealth agencies under the Governor's jurisdiction with partial or full federally funding (including OVR), were placed under a hiring freeze. Since this directive was initiated, OVR has worked diligently to submit position exemption requests to hire all job classifications, including VRC Interns and VRCs. The Administrative Officer 3 for Human Resources and Recruitment continues working closely with several bureaus within the Office of Administration to continue developing and implementing a strategic plan for recruitment and retention.

In July 2022, after ongoing collaboration and coordination with the Office of Administration – HR, an expansion of the Minimum Experience and Training Requirements (METs) for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions was approved. This expansion now permits individuals with master's degrees in the following fields to apply for the VRC, VRC-Deaf and Hard of Hearing, and VR Supervisor positions: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. This change has significantly increased the eligible talent pool for recruitment in these job classifications. Additionally, in September 2022, the Administrative Officer 3 worked closely with Pennsylvania Department of Education (PDE) to provide outreach to over 300 colleges and universities within PA to encourage applicants for all job classifications. This effort was also to again highlight the new expanded METs for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions.

In addition to the available students graduating from in-state programs, OVR's Administrative Officer 3 for HR, Recruitment & Diversity continues to recruit students from CORE/CACREP-approved universities that offer a master's degree in Rehabilitation Counseling/Clinical Rehabilitation Counseling nationwide. PA residency requirements are waived under the State Civil Service commission for the VR Counselor Internship position and other VR Counselor classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VR Counselor Intern positions to interested master's degree students who are in their final semester of graduate school. The paid internship allows OVR to attract and recruit candidates for VRC positions who will have a master's degree in the field of Rehabilitation while they are still in school and before they are recruited by other agencies. The residency waiver and the paid internship position also assist in OVR's efforts to recruit and hire from a broader recruitment pool and can include more individuals with disabilities and those from diverse and minority backgrounds.

OVR's Counselor Internship program continues to serve as an example among state VR agencies that seek to attract rehabilitation counseling students for employment. While surrounding states offer internship opportunities to students with competitive compensation, none in the northeastern region offer permanent positions to interns upon satisfactory completion of the probationary period and/or successful completion of the rehabilitation counseling graduate degree.

Through collaborative initiatives with higher education institutions, OVR will continue to expand recruitment and outreach to students with disabilities for entry-level VRC positions. Collaboration with universities on federal Rehabilitation Services Administration (RSA) grant applications that seek to provide scholarship opportunities for students with disabilities will further this initiative. This includes supporting the efforts of university programs to apply for and implement Long Term Training Grant programs to train VRCs to work for the public VR program in PA. In addition, OVR will continue the following activities as part of its overall VRC recruitment initiative:

- Continuing to build and maintain relationships with all CORE/CACREP program coordinators at graduate training programs, including Historically Black Colleges and Universities (HBCUs) that offer rehabilitation counseling disciplines. This includes campus visits, onsite presentations, use of telecommunication technology, and one-on-one meetings with students for targeted recruitment. OVR has established relationships with the following HBCU's nationwide: Alabama State University, Coppin State University, University of the District of Columbia, Fort Valley State University, Langston University, University of Maryland Eastern Shore, North Carolina A&T State University, North Carolina Central University, South Carolina State University, Southern University and A&M College, and Winston-Salem State University. OVR will also continue to build relationships with program coordinators at graduate training programs in Puerto Rico who offer rehabilitation counseling disciplines including Bayamon Central University, Pontifical Catholic University of Puerto Rico, and the University of Puerto Rico;
- Maintaining membership on Rehabilitation Counseling Program Advisory Boards, including George Washington University, Penn West University (formerly Edinboro University), Rutgers University, The University of Scranton, and West Virginia University. OVR will also maintain a commitment to other related partnership meetings, including Assumption University, Auburn University, Florida International University, and The University of South Carolina.
- Maintaining active membership with professional organizations and visiting colleges/universities, and appropriate job fairs in conjunction with the Office of Equal Employment Opportunity, to recruit potential

job applicants who are from diverse cultural backgrounds and applicants with disabilities.

### **VRC Updates**

OVR has been exploring additional options to expand the qualified talent pool for VRCs. This exploration involves consideration of varying levels of VRCs with the possibility of bachelor's level positions. This option was discussed at a previous State Board meeting and members were in favor of this option. This expansion is currently in-progress with Human Resources and union officials.

### **VRC – Deaf and Hard of Hearing**

OVR's Administrative Officer 3 for HR, Recruitment & Diversity 3 also has partnered with colleges and universities nationwide specific to VRC – Deaf & Hard of Hearing positions. Entry-level requirements for the VRC – Deaf & Hard of Hearing includes the METs for the VRC as well as passing a sign language proficiency evaluation at the intermediate level. Recruitment spans to students and alumni who receive training at universities nationwide. Students and alumni from these programs reside both inside and outside of PA. Some of these collegiate partners include Emporia State University, Gallaudet University, Troy University, Western Oregon University, and Winston-Salem State University. OVR will continue ongoing outreach and partnership with these colleges and universities.

### **Orientation & Mobility Specialists and Vision Rehabilitation Therapists**

OVR's Administrative Officer 3 for HR, Recruitment & Diversity recruits from accredited university programs in PA that train Orientation & Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. Graduates of these approved university programs are eligible for certification in VRT or O&M from the Academy for the Certification of Vision Rehabilitation & Education Professionals (ACVREP). In addition, OVR is able to recruit and hire VRTs and O&M Specialists who are being trained at universities nationwide and who reside outside of PA. Additional collegiate partners that OVR's Administrative Officer 3 has worked with in this area include the following O&M Programs: California State University – Los Angeles, Florida State University, North Carolina Central University, San Francisco State University, Texas Tech University, Stephen F. Austin State University, University of Arkansas at Little Rock, UMass – Boston, O&M and VRT Programs: Northern Illinois University, West Michigan University, and VRT Programs: The University of Arizona.

OVR BBVS continues to offer paid internships for O&M and VRT students during their last semester of study. The O&M and VRT hourly wage is

equivalent to the VRC Intern at Group 5 Step 1. This initiative will continue to increase the candidate pool of available O&M and VRT professionals who are available for employment with OVR BBVS upon successful completion of their academic training.

**(C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:**

**i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under Section 4 of the Assistive Technology Act of 1998; and**

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

OVR employs a Training Specialist who monitors trends in both training and rehabilitation, including participation in a Community of Practice under the Center for Innovative Training in VR (CIT-VR), sharing various training opportunities from other partnerships.

In addition, OVR will capitalize on the in-house expertise offered by existing agency staff to share policy and procedure updates and information about best practices with their colleagues through webinar training opportunities. OVR's internal subject matter experts receive guidance from various technical assistance centers and colleges across the nation related to VR, and also consult with other State VR programs on best practices.

OVR supports various training opportunities and coordinates efforts with various professional associations such as the PA Workforce Development Association, PA Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, PA Rehabilitation Association and the Association for Education & Rehabilitation of the Blind & Visually Impaired to train and retain qualified personnel. These external organizations frequently focus on evidence-based practices and current trends in their areas of subject matter expertise.

**(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—**



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

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

Section 101(a)(7) of the Rehabilitation Act as amended, Comprehensive System of Personnel Development (CSPD), requires State VR agencies establish personnel standards for rehabilitation staff, including VRCs, that are consistent with any national or state-approved or recognized certification, licensing or registration that applies to a particular profession. The purpose of an agency's CSPD is to ensure the quality of personnel who provide VR services and who assist individuals with disabilities to achieve competitive employment outcomes through the VR program.

### **New VRCs**

In 2002, OVR raised the entry-level requirements for VRC positions to reflect the requirements established by the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselors (CRCs). Specifically, all newly hired VRCs were required to possess a master's degree in Rehabilitation Counseling, Rehabilitation Administration or Rehabilitation Education, or CRC credentials or documented proof from CRCC of eligibility to obtain CRC credentials. The revised PA Civil Service Announcement for VRC positions became effective on October 4, 2002.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger was to assure students receive appropriate counseling coursework, streamline state counseling licensing processes, and increase skill development while improving employment opportunities. Currently, universities are increasing graduation requirements from 48 credits to 60 credits to include Traditional Rehabilitation Counseling, Clinical Rehabilitation and Clinical Mental Health counseling. The students graduating from these programs should have better developed skills in counseling techniques and applications which will lead to increased employment opportunities in both public and private sectors of VR. While a benefit to the student, there is concern of unintended negative consequences for the state VR agencies if more graduates from these programs consider applying their skills in the private sector vs. public sector.

As mentioned above, in July 2022, OVR expanded the METs for the entry level VRC as it relates to the CACREP standards.

As a result of the CORE/CACREP merger, PA Office of Administration approved the proposed MET expansion. Within this redesign, and following RSA standard (34 CFR §361.18(C)(2)(A)(1), OVR has observed documented increases in the VRC candidate pool which has allowed us to decrease our vacancies in addition to increasing our visibility amongst all CORE/CACREP programs nationwide. The approved job classifications for the expansion included: VRC, VRC-Deaf & Hard of Hearing, and VR Supervisors. The expanded degree areas included: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. All efforts are mission critical to support our District Offices and give the ability to maintain work-life balance for our employees.

OVR continues to provide the following recruitment incentives for VRCs:

- A designated Administrative Officer who actively recruits qualified VRCs, including those with disabilities, individuals from diverse cultural backgrounds, and underrepresented groups, and from all CORE/CACREP programs nationwide. The Administrative Officer has developed a plan that will continue to be proactive in adequately supplying VRCs trained to provide services to specialty caseloads such as Counselors for the Deaf & Hard of Hearing and Counselors for the Blind & Visually Impaired.
- OVR continues to support the recruitment and hiring incentive for the southeastern District Offices in Norristown and Philadelphia regarding the increase in pay scale for VRC Interns and Counselors at a Pay Scale 5, Step 9 for interns and Pay Scale 7, Step 5 for counselors.
- OVR ensures that personnel have a 21<sup>st</sup> century understanding of the evolving labor force and the needs of individuals with disabilities through staff training, professional development, and continuing education on Labor Management Information (LMI) and trends. Training and continuing education is also provided on assessment, rehabilitation technology, Social Security work incentive programs, including programs under the Ticket to Work and the Work Incentives Improvement Act of 1999, facilitation of informed choice under this program, and improving provision of services to culturally diverse populations.
- OVR continues its plan to enhance professional growth and skills of staff on emerging practices relevant to job readiness/soft skill competencies, job search skills, transferrable skills, when to disclose a disability to an employer, how to address criminal history, how to request an accommodation, tax credits, On-the-Job Training (OJT), and resources that focus on developing effective relationships with employers in the public and private sectors. To train and retain

qualified personnel, OVR will continue to provide training by university faculty, experts in the field of rehabilitation, and statewide and nationally known speakers on understanding the medical and psychosocial aspects of various disabilities, case management, best practices on developing effective relationships with employers, and understanding the effective utilization of rehabilitation technology.

- To increase understanding of the needs of individuals with disabilities, OVR will continue to work collaboratively with local community colleges, career, and technical schools to explore the development of training programs that are implemented with universal design to train individuals with disabilities for CIE in jobs that meet local labor market demand. In addition to VRCs, OVR's expanded rehabilitation team includes Business Services Representatives (BSRs) and Early Reach Coordinators (ERCs). ERCs promote successful outcomes for students and youth with disabilities by increasing awareness of OVR services and the benefits of early career planning beginning at age 14. BSRs represent OVR and our customer talent during outreach to employers and businesses throughout the geographic area of their assignments to develop job opportunities and foster good working relationships with the business community. A subset of BSRs focus on employer engagement related to transition and Pre-Employment Transition Services (Pre-ETS).

**(4) Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.**

Most OVR District Offices have at least one Rehabilitation Counselor for the Deaf & Hard of Hearing population. Entry-level requirements for these counselors require that candidates pass a sign language proficiency evaluation at the intermediate level. OVR District Offices in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRCs who can speak both Spanish and English. In instances where there are no VRCs who can communicate with a customer in his or her native language, an interpreter is hired to assist with communication.

To illustrate inclusivity, OVR employees can access services through a language line phone service that provides interpreting and translation services in more than 200 languages. When a customer is identified as needing translation services, the OVR employee will contact the translation service organization to arrange for services to begin and inform the customer of how the service will work. This service is utilized as a resource for customers and staff who serve a high concentration of underrepresented/underserved populations.

OVR plans to continue efforts to work with the blind and deaf communities to recruit and hire qualified individuals who are deaf, blind, deaf-blind and hard of hearing. In addition, OVR has a VR Specialist assigned to coordinate the Deaf, Hard of Hearing & Deaf-Blind Program in OVR. This Specialist assists with outreach to these populations to attract qualified OVR candidates for employment.

Additionally, OVR has incorporated 2016-2018 CSNA recommendations and strategies to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities. Specifically, OVR will increase training in culturally competent strategies for serving these communities. OVR will strive to provide more staff, materials, resources and services in languages other than English, which may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities, as well as refugee communities.

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

VRCs focused on Transition and Early Reach Coordinators (ERCs) within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's *School to Work Transition Policy* is provided for the benefit of new counselors and ERCs with the intention of helping them to understand their role within both VR and IDEA.

The OVR Transition Resource Manual supports this policy and is available as a reference for all OVR staff. Updates and additions are made as necessary.

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

**(j) Coordination with Education Officials.**

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

**(1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of VR services, including Pre-ETS.**

The *School to Work Transition Policy* was updated on March 11, 2021. The policy details OVR staff responsibilities regarding Pre-Employment Transition Services (Pre-ETS), transition services, outreach, collaboration, and financial

responsibility. Regarding coordination with education, OVR will collaborate with local education agencies (LEAs) to improve the successful movement from school to work for students and youth with disabilities. OVR representatives will work with LEAs to develop strong, consistent relationships with LEAs so the OVR representative's knowledge and expertise can be of benefit to students and youth with disabilities, even before students/youth are formally referred to OVR.

Transition services, including Pre-ETS, offered by OVR will supplement, but not replace, Individuals with Disabilities Education Act (IDEA) transition services delivered through a secondary school or any other entity charged with the delivery of transition services in accordance with IDEA. The LEA is responsible for providing and paying for transition services that are also considered special education or related services and that are necessary for ensuring a free, appropriate public education to children with disabilities. Nothing under Title I of the Rehabilitation Act shall be construed as reducing an LEA's obligation to provide the above-described services under IDEA (see section 101(c) of the Rehabilitation Act and §361.22(c) of the VR regulations).

VR transition services facilitate the transition from school to post-secondary life, such as achievement of an employment outcome in competitive Integrated Employment (CIE). Pre-ETS are part of the continuum of services that VR can provide to students with disabilities.

OVR will also designate a liaison to Pennsylvania Department of Education (PDE) and provide statewide coordination and technical assistance for transition from school to work. An OVR representative maintains contact as needed with personnel in area schools, alternative educational sites and community resources to ensure early identification of students and youth who may require VR services. These students and youth may or may not be receiving special education services.

**(2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:**

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

OVR and the PDE- Bureau of Special Education (BSE) have signed a Memorandum of Understanding (MOU). The MOU was approved by all parties

in October 2020. A training series that overviewed the MOU agreement was provided to OVR, BSE, LEAs, youth and families. The trainings were offered on April 8, 2021 (**Unpacking the MOU**), April 21, 2021 (**Engaging Stakeholders**) and May 13, 2021 (**Strategies for Aligning Efforts**).

In addition, OVR has collaborated with PDE-BSE on launching a new PA Secondary Transition website with the intent to provide a “one-stop shop” for professionals and which provides general information about transition, practices, and resources. The website also includes an inter-agency shared events calendar and a place to share current announcements and information. The website is closely aligned with the Transition Discoveries website that contains resources for youth and families.

In the MOU with the PDE-BSE, OVR agrees to:

- Provide consultation for transition planning for students with disabilities to facilitate the development of their Individualized Education Programs (IEPs). OVR can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- Inform and collaborate with LEAs on development and implementation of community events, such as job fairs, transition fairs, and career days, to introduce students with disabilities to possible career goals.
- Create a consistent communication plan to develop policies and procedures.
- Along with BSE, collaborate on the provision of ongoing joint staff training, such as development and implementation of IEPs, Pre-ETS, accommodations under Section 504, and limitations on youth entering employment paying subminimum wage.

Additionally, OVR participates in collaborative training each school year with other statewide transition stakeholders for education staff so that the most recent Pre-ETS information is made available to all LEAs.

BSE will direct LEAs to disseminate these requirements to parents, guardians, teachers, and students. OVR will maintain the documentation and provide a copy to the youth within the timelines identified as specified under 34 C.F.R. Part 397. Any of the services identified above that LEAs provide must be documented by the LEA and provided to the student and OVR.

**(B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their IEPs under section 614(d) of IDEA;**

OVR can assist the students and youth with a disability transition from school to CIE, or from school to post-secondary training/education that leads

to CIE. The transition goal of the student with a disability should always remain the priority of the IEP process. It is OVR's role to provide appropriate and necessary information to the student and parent/advocate to ensure the IEP is developed with effective transition foremost in mind.

LEAs will send timely invitations to OVR counselors for participation in IEP meetings, when appropriate. When possible, OVR staff will attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by the LEA. If they cannot participate in the IEP meeting, OVR staff can provide information, vocational planning and guidance, and transition-specific materials to the IEP team.

In addition to the MOU and WIOA, the PA Work Experience for High School Students with Disabilities Act (Act 2016-26) requires OVR to collaborate with local education and public agencies. Act 2016-26 requires that students with disabilities have Pre-ETS included in IEPs when appropriate and that OVR reports on IEP meeting attendance.

**(C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and Pre-ETS;**

The MOU outlines the roles and responsibilities of each agency:

OVR Responsibilities:

- Provide students with Pre-ETS and transition services under Title IV of the Rehabilitation Act of 1973, as amended by WIOA.
- Conduct outreach for students with disabilities who may benefit from VR services as early as appropriate during the transition planning process. OVR will work to foster the referral of students with disabilities to VR services at least two years prior to exiting high school.
- Coordinate a referral process for students with disabilities in need of Pre-ETS, and students or youth with disabilities interested in applying for VR services.
- Determine eligibility for individual VR services and develop an Individualized Plan for Employment (IPE) in coordination with the student's or youth's IEP or 504 plan as early as possible if a student is interested and applies for VR services prior to graduation.
- Attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by LEAs.

- Designate staff to be responsible for the oversight of the provision of technical assistance and consultation, and the development of program strategies and procedures applicable for students with disabilities.
- Provide technical assistance to BSE and LEAs through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- Identify a SPOC for each LEA and other schools (including approved private schools and other specialty schools) who will coordinate transition activities, develop collaborative approaches for student outreach and referral for VR services, facilitate communication with OVR staff, and assist with transition planning that facilitates the completion of a student's IEP and the student's transition from school to post-school employment.
- Provide information to BSE on referrals and employment outcomes of students with disabilities by LEA on an annual basis, and additional information as requested and as applicable law allows.
- Share information regarding policies, procedures, guidelines, programs and services to improving the access to, and availability of, Pre-ETS and transition services.
- Provide brochures and materials about the OVR process and services to LEAs for distribution to the students, parents, legal guardians, teachers and others.
- Conduct outreach to businesses and promote employer participation in work-based learning experiences, such as worksite tours, employer mock interviews, job shadowing, and paid work experiences for students with disabilities.
- Advise OVR staff to attend IEP meetings when invited and with parental consent to provide employment information, technical assistance, case consultation, and information on VR programs and referrals needed.
- Perform outreach activities that help inform LEAs, students with disabilities, and their families about the VR program, including purpose of program, VR eligibility requirements, referral and application procedures, and the scope of services that may be provided to eligible individuals.
- Provide SE services to a student in their final six months of high school to secure permanent CIE if it is an identified service in their IPE.

BSE Responsibilities:



- Ensure the provision of a Free Appropriate Public Education (FAPE), including transition services.
- IDEA [34 CFR §300.43 (Authority: 20 U.S.C. 1401(34))]
- Transition services for children with disabilities may be special education, if provided as specially designed instruction, or a related service, if required to assist a child with a disability to benefit from special education.
- Ensure that LEAs' coordinated set of activities supports career and post-secondary education and training options.
- Ensure that LEAs collaborate with OVR in the provision of transition services and Pre-ETS.
- Ensure that LEAs collaborate with OVR in determining the student's needed Pre-ETS activities based upon the student's current assessment and secondary transition post-secondary goals.
- Ensure that LEAs provide opportunities for students to develop employment skills and participate in community experiences.
- Ensure that LEAs provide available student information to assist in VR eligibility determination and receipt of Pre-ETS.
- Ensure that LEAs assist OVR staff with access to students and their school environment and with identifying opportunities to work with students.
- Ensure that LEAs invite OVR staff to the student's IEP meeting.
- Ensure that LEAs collaborate with OVR to determine who will be responsible for providing services that are both special education services and VR services.
- Ensure LEAs are not contracting with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.
- For students with disabilities who are seeking subminimum wage employment after high school exit, ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA.
- Ensure that LEAs implement special education requirements for transition planning services specified in IDEA as evidenced by the development and implementation of IEPs for students with identified needs.
- Designate BSE personnel to be responsible for the provision of technical assistance and consultation, and the development of

statewide program strategies and procedures applicable to students with disabilities transitioning from school to post-school activities.

- Coordinate a network of professionals focused on assisting schools with implementing effective transition planning and services.
- Provide technical assistance and consultation to OVR through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- In accordance with applicable law, share data related to students with disabilities regarding transition services, post-secondary goals, post high school outcomes, and exiting environment data.
- Provide representation on the PaRC and relevant committee participation.

#### Mutual Responsibilities:

- Training and Technical Assistance: OVR will provide consultation and technical assistance to LEAs that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. OVR will develop and provide common training and professional development opportunities to improve transition and employment results for youth.
- Planning and Coordination: OVR and BSE will collaborate in the development of a work group (Pre-Employment Transition Activities Task Force) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. This taskforce will also explore and identify Pre-ETS and transition-related services (work-based learning, internships, apprenticeships, dual enrollment programs, industry recognized credential programs, and college programs). Further, OVR and BSE agree to work collaboratively to coordinate with and engage employers on Pre-ETS for students with disabilities and transition services for youth with disabilities.
- OVR and BSE will continue to collaborate and lead in the PA Secondary Transition Community of Practice and related State Leadership Team.
- Data Sharing: OVR and BSE will share of data, within the bounds of applicable law, of potentially eligible and/or eligible students with disabilities regarding transition services and outcomes.
- OVR and BSE will post this MOU and provide training and technical assistance to VR and Education staff at the state and local level that is recorded and archived on their respective websites.

- OVR and BSE will provide relevant training and technical assistance to minimize redundant services and maximize resources in both systems.
- OVR and BSE will provide a copy of this MOU to the following key stakeholders:
  - all LEA superintendents or chief school administrators
  - all directors of special education
  - all OVR District Administrators
  - Office of Developmental Programs (ODP)
  - Pennsylvania Rehabilitation Council (PaRC)
  - State Board of Vocational Rehabilitation
  - Right to Education State Task Force and Local Task Forces
  - Client Assistance Program (CAP)
  - other entities as identified.
- OVR and BSE will mutually develop and distribute notices, memorandums, and other information regarding transition to key stakeholders.
- Transition Services/Accommodations: OVR and BSE will identify and disseminate information about Pre-ETS and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- Assistive Technology (AT): BSE will work with OVR on identifying the AT needs of students eligible for OVR services.
- OVR and BSE will encourage students with disabilities to gain targeted skills necessary to compete in the workforce through specialized technical education programs, trade schools, pre-apprenticeships/apprenticeships, industry-based skills trainings, and internships.
- OVR and BSE will investigate additional funding sources for high school students with disabilities, such as statewide WIOA Title I programs for supplemental assistance through individual training accounts (ITAs).

For financial responsibilities, OVR and BSE will identify a method for defining the financial responsibility of OVR and LEAs for the provision of VR services and will identify procedures under which OVR may initiate proceedings to secure reimbursement for VR services from LEAs and vice versa. 34 C.F.R. §§ 300.154 & 361.53(d)(3)(i) and (iii).

Disagreements about which entity is financially responsible for payment for services may occur, and decisions about whether the service is related to an employment outcome or educational attainment, or whether the service is considered a special education or related service, as well as whether the service is one customarily provided under IDEA or the Rehabilitation Act, will be made at the State level by BSE and OVR.

LEAs should continue to provide some of the transition services typically provided under IDEA rather than cease providing the services with a referral to the VR program. If any of the five required Pre-ETS are needed by a student with a disability, and are not customary services provided by LEAs, OVR will collaborate and coordinate with the LEA regarding the provision of such services.

When similar or identical service needs are identified as education-related in the IEP established by the LEA and employment-related in the IPE established by OVR, it is understood that disputes will be resolved between OVR and LEAs at the local level. The process for dispute resolution is as follows:

- If the service is special education or a related service and included in the student's IEP, the LEA may provide the service either directly or through other sources, or request OVR provide the service. If OVR determines the service does not violate the comparable benefits policy (unless such a determination would interrupt or delay the progress of the individual) and is identified as a service on the individual's IPE, OVR may assume the costs for the service. If OVR determines that the purpose of the service is more for educational attainment than achievement of CIE, then the LEA would pay for the service, as they would for services under IDEA.
- OVR's funding for assessment for eligibility and vocational needs, counseling and referral services, job placement services, rehabilitation technology and auxiliary aids and services are exempt from comparable benefit and the Financial Needs Test (FNT).
- When AT goods or services are needed for educational purposes, it will be the financial responsibility of the LEA. However, prior to exit from high school, OVR will determine needs and comparable benefits for AT for post-secondary education and employment purposes for the individual as needed for employment and identified on the individual's IPE.

Nothing in the MOU shall be construed to reduce the obligation under IDEA for the LEAs to provide/pay for transition services that are required to ensure FAPE.

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

OVR and BSE will support outreach activities that will ensure referrals to OVR to provide eligible and potentially eligible students with disabilities a smooth school-to-work transition. OVR outreach activities focus on providing information about VR to school staff, students, families, community professionals, and others interested in Pre-ETS and transition services, including students and families of diverse backgrounds. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the following:

- VR program purpose
- Eligibility requirements
- Application procedures
- Scope of services that may be provided to eligible students
- Pre-ETS that may be provided to potentially eligible or eligible students.

OVR will provide information to BSE and LEAs regarding OVR services that will be disseminated to students and their families. BSE will ensure that LEAs highlight the information and outreach activities provided by OVR and make such information and activities available to all students with disabilities and families of students with disabilities.

OVR staff may conduct outreach in the following manner such as:

- Providing VR brochures and business cards to the school.
- Presenting at the first open house, family information nights, or orientation held at the school.
- Conducting regularly scheduled school visits.
- Participating in transition and job fairs at the school.
- Attending IEP meetings, when invited.
- Speaking about Pre-ETS and VR services at school staff meetings, teacher in-service trainings, student/family group meetings, or interagency meetings.

OVR will work with LEAs to ensure referrals of students with disabilities to the VR program at the beginning of the school year. Referral for Pre-ETS should begin at age 14 for all students with disabilities who may need them.

While outreach typically occurs in the LEA environment, OVR will work with PDE to identify students and youth with disabilities who may not be served in public schools under an IEP or 504 Plan. Outreach will be conducted to identify students and youth with disabilities who are underserved through other community partners, such as, but not limited to:

- Intermediate Units (IUs)
- Career and Technology Centers
- Approved Private Schools
- Charter and Cyber Schools
- Home School Organizations
- Student Assistance Programs
- Summer CIE programs
- Workforce Development Boards (WDBs)
- Parent-Teacher Associations, etc.
- Juvenile Justice System
- Foster Youth Organizations
- Homeless shelters/programs
- Medical facilities.

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

As part of the MOU between OVR and the PDE-BSE, for students with disabilities who are seeking subminimum wage employment after high school exit, BSE will ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA. The MOU includes the following section:

**1. Limitations on Subminimum Wage and Documentation Requirements under Section 511**

Documentation requirements under Section 511 of the Rehabilitation Act for students with disabilities seeking subminimum wage employment: Under Section 511 of Rehabilitation Act, 14(c) businesses referred to as “employers” are prohibited from employing any individual with disabilities who is 24 years of age or younger at subminimum wage, unless the

individual has received documentation from OVR upon completion of all the following activities:

- a.** Pre-ETS or transition services under the IDEA; and
- b.** Apply for VR services and the individual was determined:
  - i. Ineligible for VR services.
  - ii. Eligible for VR services, had an approved IPE, and the individual was unable to achieve an employment outcome in CIE after a reasonable period of time, and his/her case was closed.
  - iii. Regardless of the eligibility determination made, the youth with a disability has received career counseling, and information and referral services to federal and state programs to help the individual explore, discover, experience, and attain CIE and the counseling and information was not for employment at subminimum wage.

BSE will direct LEAs to disseminate these requirements to parents, guardians, teachers, and students. OVR will maintain the documentation and provide a copy to the youth within the timelines identified as specified under 34 C.F.R. Part 397. Any of the services identified above that LEAs provide must be documented by the LEA and provided to the student and OVR.

OVR, in consultation with the BSE, will develop a new process or use an existing process to document the completion of the actions described in sections 397.20 and 397.30 by a youth with a disability, as well as a process for the transmittal of that documentation from LEAs to OVR, consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (20 U.S.C. § 1232g(b) and 34 C.F.R. §§ 99.30 and 99.31) and IDEA (20 U.S.C. § 1417(c) and 34 C.F.R. § 300.610), pursuant to section 511(d) of the Rehabilitation Act and 34 C.F.R. § 397.10. This documentation must contain, at a minimum (34 C.F.R. § 397.10(a)(1)):

- Youth's name.
- Determination made, including a summary of the reason for the determination or a description of the activity or service completed.
- Name of the individual making the determination or the provider of the service or activity.
- Date determination was made or the required service or activity completed.

- Applicable signatures and dates by OVR or education personnel making determination or documenting completion of the required services or activity.
- Signature of the OVR personnel transmitting documentation to the youth with a disability.
- Date and method by which the document was transmitted to the youth.

If a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by Section 511 or the implementing regulations at 34 C.F.R. Part 397, documentation must, at a minimum:

- Contain the information in section 397.10(a)(2).
- Be provided by the OVR to the youth within 10 calendar days of the youth's refusal to participate.

OVR and LEAs will retain copies of the documentation in a manner consistent with the requirements of 2 C.F.R. § 200.333.

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

As part of the MOU between OVR and the PDE-BSE, BSE will assure LEAs are not contracting with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.

The MOU states:

- BSE will not and will instruct LEAs to not enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.
- OVR and BSE are committed to supporting the Employment First Act.

**(k) Coordination with Employers.**

In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify Competitive Integrated Employment (CIE) and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including Pre-Employment Transition Services (Pre-ETS) for students with disabilities.



OVR routinely engages with employers and businesses to better understand their workforce needs so OVR can prepare individuals with disabilities with industry skills to best meet industry skill demands required by businesses and employers to be successful in competing in the global marketplace. OVR has Central Office staff who are available to meet with an employer to listen and explore their organization's unique culture to learn about the services or products they produce, to learn about employee skill needs, and how the leadership of a company or organization envisions their future workforce succession planning and the inclusion of VR talent throughout all levels of their organization. Where possible, OVR will coordinate business outreach with local workforce boards, PA CareerLinks, economic development partners, Community Rehabilitation Programs (CRPs), Department of Human Services (DHS), Office of Developmental Programs (ODP), Office and Mental Health & Substance Abuse Services (OMHSAS), and Office of Long-Term Living (OLTL), and other Department of Labor & Industry (DLI) Bureau of Workforce Partnership & Operations (BWPO) multi-employer workforce partnerships.

- 1.** In response to an organization's workforce talent needs, OVR can suggest a recruitment process to bring qualified pre-screened individuals with a disability into their organization.
- 2.** OVR will work with each business to target career ladders and pathways for quality CIE in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities, and the talent succession plans of an employer.
- 3.** VR will keep the process simple by using a SPOC approach modeled after the Council of State Administrators of Vocational Rehabilitation (CSAVR) use of a national Points of Contact network when a business with multi-county or state operations seeks VR talent across several states and PA workforce regions.

The following are OVR employer outreach and networking strategies to work with employers to increase CIE and career exploration opportunities:

- 1.** National and in-state outreach to employers/businesses to recruit and hire people with disabilities will consistently be encouraged through engagement or registration with Commonwealth Workforce Development System (CWDS), CSAVR, National Employment Team (VR-NET), and the VR-NET Talent Acquisition Portal;
- 2.** Employer outreach by OVR BSOD Specialists through in-person and/or virtual/telephonic meetings, regional and statewide Rehabilitation Services Administration (RSA)-allowable Chamber of Commerce membership, networking, and Society of Human Resource Manager statewide and local organization involvement;

- 3.** Outreach to employers to recruit and hire people with disabilities through local District Offices and HGAC. HGAC business services staff will identify and coordinate with the referring district VRCs and business services staff to find a suitable job match for customers. This will include identifying any measurable skill gains that result from the customers acquisition of an industry recognized credential. Local District Office business service teams will actively coordinate employer recruitment, work-based learning experiences, internships, apprenticeships and pre-apprenticeships, On-the-Job Training (OJT) and other on-boarding supports for OVR customers. District Office business services staff, in consultation with VRCs, will monitor successful job performance and follow-up with the OVR customer and employer to ensure job retention;
- 4.** No-cost consultation to employers will be provided on disability etiquette, accessibility, and accommodation needs by BSOD specialists, HGAC staff or combined Bureau staff upon request. Referral assistance to help retain an employer's workforce following an injury or the onset of a disability will also be provided. OVR staff trained in the mid-Atlantic TransCen, ADAA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibility Kit, and the ADAA Architectural Guidelines standards, will provide non-legal, best practice disability etiquette training, and on-site accessibility compliance reviews;
- 5.** BSOD specialists will provide no-cost compliance consultations to CRPs of 14(c) Federal Ability One, or State operated set aside vendors, to ensure work settings are fully integrated before federal VR funds are used in placement supports or on-boarding;
- 6.** OVR's BSOD Specialists will conduct employer/business satisfaction surveys to measure effectiveness in business engagement; and
- 7.** BSOD Specialists and combined local Bureau staff will continue to promote and support National Disability Employment Awareness Month events. These events will include employer champions who actively recruit and retain persons with disabilities in their workforce.
- 8.** OVR will work to establish regular employment hiring events to serve employers both at local/regional and statewide levels. These events may be conducted both in-person and through virtual means. In-person events are anticipated to incur costs for venue, supplies, marketing, and other materials to ensure the success and participation of employers, service providers, human service resources, and participants with disabilities. Virtual hiring events may require the

purchase of a web access platform to accommodate an interactive and accessible virtual venue.

- 9.** BSOD staff will assess and market available resources and services offered by OVR to employers through a proposed Business Portfolio tool. This tool will be offered to employers both in printed and electronic formats and will be designed to showcase the value of business partnerships with OVR and its constituents.

#### Partnering with Workforce Agencies to Align with Regional Employment Sectors

OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local WDBs.

OVR and Workforce partners will review and target employers in the key expansion sectors for the highest level of business engagement, which will include discussions around establishment of work-based learning experiences. In addition, all OVR business services staff will utilize and share Labor Market Information (LMI) published monthly from the PA DLI's Center for Workforce Information and Analysis (CWIA) with their District Office VRCs to promote career-based Individualized Plans for Employment (IPEs) likely to lead to successful employment and skill training to prepare for expansion or 'super' sector jobs in each region of PA. Also, OVR and Workforce are excited to support these landmark pieces of legislation: the Infrastructure Invest and Jobs Act, known as the Bipartisan Infrastructure Law (BIL), Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA), and will explore the potential changes these Acts may bring to the job market and the job opportunities they may bring to our customers.

OVR continues to expand its collaboration with employers, industry partnerships, and other multi-employer workforce partnerships to provide students and youth with disabilities opportunities for career exploration to promote CIE. Students and youth with disabilities will be given opportunities to complete work-based learning experiences to develop soft skills and work-related skills. Students and youth with disabilities may be afforded opportunities to complete mock interviews with employers, job shadowing experiences, career days, disability mentoring days with employers, and other Pre-ETS to prepare students for CIE. Project SEARCH is one example of this type of collaboration.

The OVR Early Reach Program is to assist youth with disabilities in becoming better prepared for the transition from high school to the world of work and independence. Early Reach is intended to promote successful employment outcomes for youth with disabilities, beginning at age 14, by increasing awareness of OVR services and the benefits of early career planning.

An Early Reach Coordinator (ERC) is an OVR employee with an extensive background in the social work profession. ERCs have specific training and skills in delivering services to a variety of populations. ERCs also have a great deal of experience in the service systems that students with disabilities encounter throughout their lives.

ERCs primary role is to develop and provide dynamic and engaging presentations and events that focus on the five required Pre-ETS categories. Coordinators also provide informational presentations and consultation to school personnel, community agencies, youth with disabilities and families to outline the services offered by OVR. Additionally, ERCs can assist youth with disabilities in planning and applying for OVR services and can provide consultation and links to resources that will help youth with disabilities pursue both independence and participation in the workforce.

### **(I) Interagency Cooperation with Other Agencies.**

In accordance with the requirements in section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

#### **(1) State programs (designate lead agency[ies]) and implementing entity[ies]) carried out under section 4 of the Assistive Technology Act of 1998;**

OVR utilizes the following agreements to address the Assistive Technology (AT) needs of customers seeking employment services:

- 1.** PA's Initiative on Assistive Technology ("PIAT") – The Assistive Technology Lending Library (ATLL) is a program facilitated through the Institute on Disabilities at Temple University, "TechOWL." PIAT is a regional center for southeast PA and is also the main organization for TechOWL. PIAT facilitates the activities of all of the other regional centers and reports to the state and federal agencies that fund our work. ATLL is PA's statewide program under Section 4 of the Assistive Technology Act. Activities that are provided by ATLL are: device demonstrations; device lending; device reuse; public awareness activities; and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to Pennsylvanians with disabilities which includes OVR staff and clients, often at no charge.
- 2.** OVR utilizes additional AT providers through whom services and/or devices can be purchased to address the specific needs of customers. OVR has executed Letter of Understanding (LOUs) or Administrative Memoranda (AM) agreements for expanded services to customers.

## **(2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;**

Currently, OVR does not have any agreements with the Department of Agriculture. However, in 1997, OVR and the Pennsylvania State University, College of Agricultural Sciences, Penn State Extension approved an LOU for the AgrAbility program. In 2017, two new fees were added to the LOU to include reimbursement for travel and professional fees. Currently both agencies are working together to develop an Intergovernmental Agreement (IGA). The AgrAbility Project is a statewide project whose staff provides direct services for OVR customers who are farmers with a disability who want to remain in production agriculture. This agreement does not guarantee a specific amount of total funds or total number of participants to be funded by OVR. OVR has modeled this agreement and payment structure after existing rates and services where applicable.

## **(3) Non-educational agencies serving out-of-school youth;**

A Memorandum of Understanding (MOU) has been developed between OVR and the Bureau of Juvenile Justice Services (BJJS) to coordinate their work to support students and youth with disabilities receiving services through a PA Academic, Career and Technical Training (PACTT) Affiliate. BJJS provides state funds to OVR to serve students and youth. OVR will meet with PACTT Affiliates to determine need for services, will provide and/or set-up services to students and youth, and will assist interested PACTT Affiliates in becoming Pre-Employment Transition Services (Pre-ETS) providers.

## **(4) State use contracting programs;**

OVR uses a number of statewide contracts through the PA Department of General Services (DGS), the agency responsible for the majority of Commonwealth contracting programs.

OVR and Office of Developmental Programs (ODP) have developed a Training Services Invitation to Qualify (ITQ) through DGS for Specialized Professional Skills Development Training. This ITQ pre-qualifies contractors to provide Supportive Employment Certification Trainings for OVR and/or ODP Community Rehabilitation Program (CRP) agencies, who support individuals with the most significant disabilities, and who provide supportive employment services. When a training is needed, a Request for Quote (RFQ) is developed and sent to the qualified contractors. An ITQ qualified contractor will be awarded a contract to provide necessary services based on the best value, meaning the best service. Contractors will provide training for CRP agencies for the following two certifications: The Association of Community Rehabilitation Coordinators' (ACRE) Certificate Training Program; or the Association of People Supporting Employment First (APSE) Certified Employment Support Professional (CESP) Certification.

DGS has executed multiple contracts with various service providers across PA to provide Sign Language Interpretation and Transliteration Services for all agencies in the commonwealth requiring the services of an interpreter or translator for business functions. OVR uses these contracts to secure interpreter services for daily business proceedings, meetings, workshops, public presentations, and conventions.

DGS has developed an ITQ for Information Technology (IT) hardware providers for Commonwealth agencies to purchase IT hardware. OVR then issues a Request for Proposal to qualified providers to purchase computers, monitors and peripherals for staff.

DGS developed a statewide Services ITQ to qualify contractors to address IT service requirements of Commonwealth executive agencies. This contract is for fixed price, deliverables-based IT services projects. OVR uses this contract to purchase IT Training-Classroom/Non-Classroom for OVR staff.

**(5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);**

In PA, the State agency responsible for providing services for individuals with developmental disabilities is Department of Human Services (DHS)/ODP. One of the ways OVR collaborates with DHS/ODP is through Section 511 of the WIOA. Section 511 of WIOA amends the Rehabilitation Act, and has added new requirements that place limitations on the payment of subminimum wages by entities holding special wage certificates under Section 14(c) of the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* The provisions of Section 511 require more involvement from OVR with individuals working in Section 511 subminimum wage jobs and services for those under 24 years old prior to placement in a Section 511 employment position. DHS/ODP provides the license to the facilities that OVR must visit and monitor. Section 511 of WIOA requires that certain criteria must now be satisfied before an entity hires individuals with disabilities who are age 24 or younger (youths) at subminimum wage or continues to employ individuals with disabilities of any age at the subminimum wage level. OVR's role is to ensure that individuals with disabilities have access to information and services that will enable them to achieve Competitive Integrated Employment (CIE).

OVR provides services to individuals working in Section 511 subminimum wage jobs in the form of Career Information and Referral Sessions. OVR's Section 511 Career Information and Referral Sessions focus on: reassuring individuals that they do not need to make any changes; promoting informed choice and independent decision making about CIE; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

**(6) State agency responsible for providing services for individuals with developmental disabilities;**

An MOU has been developed between OVR and PA ODP to fund, implement, and manage key services within the InVEST Project Model, a five-year model demonstration grant funded by the Disability Innovation Fund. The MOU will fund the following: 1) ODP Grant Liaison, a contracted position that will manage services funded through the grant via ODP contracts as well as assist with data collection, project monitoring and evaluation; 2) Training & Technical Assistance from the University of Missouri - Kansas City on Charting the LifeCourse™ Framework to integrate supported decision making throughout the InVEST Project; and 3) Services from PA Family Network for six positions dedicated to engaging adults with ID/DD/Autism who are earning subminimum wage and their families to consider the benefits of CIE. Representatives from ODP assisted with the development of the Subminimum Wage to Competitive Integrated Employment (SWTCIE) Grant proposal and have been OVR's primary partners in the development of the project. Both OVR and ODP representatives attend biweekly project team meetings. A relationship with the UMKC- CtLC™ Framework team has been established via ODP and initial OVR staff training is being developed for delivery in May/June 2023. Weekly meetings are conducted with the PA Family Network, funded through ODP's contract with the Columbus Organization to discuss project development and to identify preliminary opportunities for education about the InVEST Project.

**(7) State agency responsible for providing mental health services;**

The existing MOU between OVR and Office and Mental Health & Substance Abuse Services (OMHSAS) ended on June 30, 2022. A new MOU is to be developed. The MOU will explore a transfer of funds from DHS to OVR, which would support opportunities for customers with serious mental health conditions to participate in various Certified Peer Specialist (CPS) training opportunities to achieve CIE. Certified Recovery Specialist (CRS) trainings and employment supports for customers with mental health diagnoses will also be explored.

**(8) Other Federal, State, and local agencies and programs outside the workforce development system; and**

OVR is participating in Brain Injury REACH, a research study conducted by the Icahn School of Medicine at Mount Sinai in collaboration with the Brain Injury Association of Pennsylvania (BIAPA) and funded by a federal grant from the National Institute of Justice. The study aims to evaluate NeuroResource Facilitation (NRF) intervention in adult male re-entrants with brain injury who are returning to Philadelphia, Bucks, Chester, Delaware, and Montgomery counties. The goal of NRF is to increase recidivism and improve community participation upon re-entry. VR has been identified as a

key component of NRF. This project is being conducted in four State Correctional Institutions (SCIs) across PA (Chester, Frackville, Mahanoy, & Phoenix) over an initial five-year period (2021-2024) with plans for extension in place. The Reading and Norristown BVRS District Offices have collaborated with the NRFs in processing referrals and determining eligibility prior to case transfer to the District Office of residence.

OVR will continue to work with the Office of Administration (OA) to explore hiring initiatives within the commonwealth to increase employment opportunities for OVR customers through On-the-Job Training (OJT) funding, internships, customized employment, and other potential direct hiring initiatives.

The Centers for Independent Living (CILs) are key stakeholders. All OVR offices have relationships with the CILs in their areas and exchange referrals as appropriate.

### **(9) Other private nonprofit organizations.**

OVR maintains negotiated LOUs, as well AMs and provider agreements with more than 200 community service providers covering more than 1,000 different rehabilitation, independent living and related services. OVR is currently converting LOUs to an AM or provider agreement. Many of these organizations are private and/or not-for-profit CRPs.

Through these various agreements, OVR defines service programs and the corresponding conditions of purchase, including fees and effective/expiration dates, which exist between a rehabilitation service provider and OVR. An agreement entered into between OVR and a community service provider creates a locally developed, locally negotiated, and locally sensitive response to the rehabilitation service needs of persons with significant disabilities in the diverse areas of PA.

These agreements are neither a contract nor a grant agreement, but an agreement between the parties that sets forth the services and rates that will be acceptable for OVR payment. They do not commit either provider or OVR to the sale or purchase of the defined services, or a guarantee of provision or business. The use of an LOU or AM for OVR customer service allows OVR to provide customer choice, to respond to a customer's satisfaction with the service, to control affordability of service fees, and the ability to provide alternative services when needed.

## **VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES CERTIFICATIONS**



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

1.	The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, <sup>1</sup> and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit) <sup>2</sup> agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan <sup>3</sup> , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations <sup>4</sup> , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment

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<sup>1</sup> Public Law 113-128.

<sup>2</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

<sup>3</sup> No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

<sup>4</sup> Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 CFR part 361.

	Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan <sup>5</sup> , the Rehabilitation Act, and all applicable regulations <sup>6</sup> , 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;
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The Executive Director of the Office of Vocational Rehabilitation 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;
8.	The Executive Director of the Office of Vocational Rehabilitation has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

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

<sup>6</sup>Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

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.
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## ASSURANCES

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

### The State Plan must provide assurances that:

1.	<b>Public Comment on Policies and Procedures:</b> 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.	<b>Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</b> The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	<b>Administration of the VR services portion of the Unified or Combined State Plan:</b> The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

	<p>(a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.</p> <p>(b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.</p> <p>(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.</p> <p>(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).</p> <p>(e) as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.</p> <p>(f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</p> <p>(g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</p> <p>(h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.</p> <p>(i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.</p> <p>(j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.</p> <p>(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.</p> <p>(l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).</p>
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	(m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4.	<p><b>Administration of the Provision of VR Services:</b> The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <ul style="list-style-type: none"> <li>(a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.</li> <li>(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.</li> <li>(c) provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.</li> <li>(d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</li> <li>(e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</li> <li>(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.</li> <li>(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.</li> <li>(h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.</li> </ul>

	<p>(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.</p> <p>(j) with respect to students with disabilities, the State:</p> <ul style="list-style-type: none"> <li>(i) has developed and will implement, <ul style="list-style-type: none"> <li>(A) strategies to address the needs identified in the assessments; and</li> <li>(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</li> </ul> </li> <li>(ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).</li> <li>(iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.</li> </ul>
5.	<p><b>Program Administration for the Supported Employment Title VI Supplement to the State plan:</b></p> <p>(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.</p> <p>(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.</p>
6.	<p><b>Financial Administration of the Supported Employment Program (Title VI):</b></p> <p>(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</p>

	<p>administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.</p> <p>(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.</p>
7.	<p><b>Provision of Supported Employment Services:</b></p> <p>(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that</p> <p>the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.</p>

## Certification Signature

Signatory information	
Name of Signatory	Ryan Hyde
Title of Signatory	Executive Director
Date Signed	

## Appendix 1: Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

### Vocational Rehabilitation Program

Category	Program Year 2026 Expected Level	Program Year 2026 Negotiated Level	Program Year 2027 Expected Level	Program Year 2027 Negotiated Level
Employment (Second Quarter after Exit)	59%	TBD	60%	TBD
Employment (Fourth Quarter after Exit)	50%	TBD	50%	TBD
Median Earnings	\$5500	TBD	\$5550	TBD



<b>Category</b>	<b>Program Year 2026 Expected Level</b>	<b>Program Year 2026 Negotiated Level</b>	<b>Program Year 2027 Expected Level</b>	<b>Program Year 2027 Negotiated Level</b>
(Second Quarter after Exit)				
Credential Attainment Rate	30%	TBD	30%	TBD
Measurable Skill Gains	45%	TBD	45%	TBD
Effectiveness in Serving Employers <sup>7</sup>	Footnote update TBD	Footnote update TBD	Footnote update TBD	Footnote update TBD

Additional Indicators of Performance
1. Pennsylvania has chosen not to identify any additional indicators of performance.
2.
3.
4.

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<sup>7</sup> The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.