

PENNSYLVANIA PYS 2020-2023 - VOCATIONAL REHABILITATION
PROGRAM (COMBINED OR GENERAL)

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

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of Workforce Innovation and Opportunity Act (WIOA): Sec. 102(b)(2)(D))(iii) of WIOA.

A. INPUT OF STATE REHABILITATION COUNCIL

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

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS

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

1. the PaRC annual report (Program Year (PY) 2018 – 2019, 2019-2020)
2. OVR Customer Satisfaction Surveys (redacted and provided by OVR)
3. review of items in the 2018 State Plan Input of State Rehabilitation Council
4. comments received at the 2018 and 2019 State Plan Public Meetings; various meetings with OVR liaisons to discuss and prepare input into the 2020-2023 plan.
5. participation in the Rehabilitation Services Administration (RSA) Monitoring (August 2019)
6. Comprehensive Statewide Needs Assessment (CSNA) PY 2016 - 2018 OVR/Institute on Disabilities at Temple University
7. local Citizen Advisory Committees (CAC) meetings and/or minutes (provided by OVR); and
8. quarterly reports received from OVR at PaRC Council meetings.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

Commendation: The Council supports OVR in their efforts to open the order of selection as soon as possible for the benefit of Pennsylvanians with disabilities seeking employment services through OVR.

1. The Closure of the Order of Selection (OOS) for All Categories

Issue: The closure of the Order of Selection (OOS) for all categories represents a significant challenge to people with disabilities having access to employment services when they are needed. OVR must develop appropriate internal controls and other adjustments in order to re-open the OOS as soon as possible and update the PaRC regarding progress on at least a quarterly basis.

Recommendations/Measurable goals:

1. OVR provides quarterly reports (at a minimum) to the PaRC on how many people were added to and removed from the waiting list in each category each quarter.

OVR Response: OVR will provide quarterly reports to the PaRC during the quarterly council meetings to address how many people were added to and removed from the OOS waiting list in each category per quarter.

2. OVR provides quarterly reports (at a minimum) to the PaRC and the State VR Board on new application response times.

OVR Response: Per RSA Monitoring Report (Nov. 2020) and agency planned corrective action steps, OVR will update existing policies and procedures to ensure that the eligibility determination timeline commences at the time of application. OVR will offer alternative methods of referral to enhance the referral experience for stakeholders. OVR shall provide updated policy and procedures to RSA for review. OVR staff will receive future training related to these changes and the PaRC will be updated on progress on a quarterly basis.

3. OVR establishes a clear deadline for reopening the OOS with intermediate steps and goals to re-open the OOS on time. OVR provides quarterly reports (at a minimum) to the PaRC on progress and factors affecting progress toward achieving the goal of re-opening the OOS on a permanent basis by the deadline.

OVR Response: The goal of OVR is to open the OOS as soon as possible. RSA has approved OVR to review and evaluate the ability to open the OOS on a quarterly basis. OVR will report to the PaRC quarterly on plans to reopen the OOS and factors affecting progress toward achievement of this goal.

4. Identify resources and opportunities outside of OVR for organizations to provide employment services to OVR customers on the waitlist.

OVR Response: OVR will seek opportunities to leverage other public and private resources that may provide employment services to OVR customers on the waitlist. During a closed OOS, 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.

2. Hiram G. Andrews Center (HGAC)

Issue: OVR's current fiscal problems require a review of HGAC's return on investment.

Recommendations/Measurable Goals:

OVR should conduct a study at a minimum of every 3 years and report on the return on investment (compared to community-based VR services) for students attending HGAC. HGAC's yearly budget averages approximately \$23 million, which includes staff, operations, brick and mortar and other costs. Overall, the cost per customer is reported as significantly higher at HGAC than that of non-HGAC customers. The report must include:

1. an analysis on return on investment
2. an impact statement on customer choice

3. a review of the extent to which its programs are provided in an integrated setting
4. an assessment of the availability of HGAC programs in the community; and
5. a determination of what other partners like the Pennsylvania Department of Education (PDE) should be paying/contributing.

OVR Response: HGAC is not exclusively funded with VR funds; state funds are used for building maintenance. OVR will conduct a regular review of HGAC and provide data and information that illustrates the viability, value, and uniqueness of HGAC from multiple perspectives (customer satisfaction, Comprehensive Statewide Needs Assessment, Fiscal, programmatic outcomes, diversification initiatives of student populations and revenue streams). When conducting this review, OVR will make an effort to show the differentiation between the use of state funds vs. federal VR funds. This information will be shared with the PaRC during quarterly meetings.

3. Conduct a review of OVR's statutory and regulatory obligations to obtain public comment and/or consult with stakeholders, providers, VR staff, and individuals with disabilities in the development, implementation and amendment of OVR's policies and procedures.

Issue: Pursuant to 34 CFR 361.20, OVR is required to solicit public participation when it proposes to develop, amend or otherwise modify substantive policies/procedures affecting OVR services.

Recommendations/Measurable goals:

1. OVR should provide quarterly information on the number and names of new/amended policies, such as a college policy or vehicle modification policy, being developed or in consideration for future development/modification, including how they differ from any existing policy and the potential number of customers impacted by the policy.

OVR Response: During each PaRC quarterly meeting, OVR will continue to report on the number and names of new/amended policies being developed or in consideration for future development/ modification.

2. Inclusion of the Council in the development/amendment of the policy/procedure, the proposed timeline of implementation, including schedule of public comments and plans to educate stakeholders on the new/amended policy/procedure.

OVR Response: When a substantive policy/procedure change is being considered, OVR will continue to consult with RSA to confirm that a public comment period is necessary. OVR will continue to invite Council members to participate in any planned workgroup. OVR will continue to provide subsequent drafts of new and revised policies to the appropriate PaRC committees and full council. OVR will keep the PaRC informed of any training plan developed to educate stakeholders on policy changes.

4. Strengthen Collaboration and Partnerships with Stakeholders

Issue: OVR has made significant changes to services without including key stakeholders throughout the change development process. OVR needs to make sure that those changes will not unnecessarily reduce the achievement of outcomes in terms of quantity and quality.

Recommendations/Measurable goals:

1. Before OVR makes any substantive changes, the PaRC will be informed of what needs to change and why, and what affected stakeholder representatives are being included in the change development process.

OVR Response: OVR will continue to inform the PaRC before making any substantive changes to policy and identify which stakeholders may be affected by any change.

2. OVR provides (at a minimum) quarterly reports to the PaRC on all substantive changes either anticipated or currently in development with information on progress, including key stakeholder representative involvement and contributions to the process.

OVR Response: When a substantive policy/procedure change is being considered, OVR will continue to invite Council members and stakeholder representatives to participate in any planned workgroup. Workgroup progress will be provided during quarterly PaRC meetings.

3. OVR provides annual reports (at a minimum) on feedback survey information from key partners.

OVR Response: Anytime OVR initiates a survey of key partners, the results will be shared during quarterly PaRC meetings.

4. OVR provides quarterly progress reports with measures of quality and quantity of outcomes for partnerships, programs, and services, including pre-employment transition services, local workforce development boards, supported and customized employment, business services, and PA CareerLinks.

OVR Response: OVR provides quarterly reports on Act 26, Work Experience for High School Students with Disabilities, which is shared with the PaRC and available publicly on OVR's website. This report includes information related to pre-employment transition services as well as information on supported employment outcomes. OVR developed an Excel document that identifies connections between OVR District Offices with workforce development boards and PA CareerLinks. This document can be shared with the PaRC on an annual basis. OVR Business Services information is regularly included in the Executive Director quarterly report to the PaRC.

5. Review of OVR Policies and Procedures

Issue: Clarification is required regarding public participation in the adoption or amendment of OVR policy, and OVR's obligation to consult with the PaRC, among others, on matters of general policy arising in the administration of the VR services portion of the State Plan.

Recommendations/Measurable goals:

OVR reports to the PaRC on a quarterly basis substantive policies and procedures under review which are subject to public meetings, non-substantive administrative changes, and policies on matters of general administration of the VR program which require consultation. Additionally, include quarterly reports on workgroups.

OVR Response: Pursuant to 34 CFR 361.20, OVR will report to the PaRC on any substantive changes to policies or procedures governing the provision of vocational rehabilitation services that would require OVR to conduct public meetings and/or directly impacts services provided to individuals with disabilities. As requested, OVR will also report during quarterly PaRC meetings on any active workgroups.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

OVR did not reject any of the PaRC's input or recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

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.

The IGA provides SDoL with funds to administer 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); and
3. Job Trainer (Paraprofessional).

The two programs are considered to be two separate paths for transition services. Pathway One is identified as "Employability and Career Readiness" and Pathway Two is identified as "College and Career Readiness."

Services in the Employability and Career Readiness program include:

1. workplace readiness instruction;
2. work-based learning experiences which include job shadowing, internships, and paid work experiences;
3. job development and placement services including employer contacts, job site analyses, job task analyses, facilitation of job accommodations, coordination of job interviews, and on-the-job supports;
4. career training supports to address employment related concerns on and off the job; and
5. independent living skills related to employment.

The Goals of the Employability and Career Readiness program are:

1. to provide employment skills, career readiness training and transition services to 50 OVR eligible students with disabilities;
2. to provide at least one form of work-based learning experience to 60 OVR eligible students with disabilities during PY 2020 – 2021;

3. to establish a minimum of 5 students-employee (job positions) with employers during 2020-2021 that afford small group training opportunities for OVR eligible students with disabilities;
4. to establish a minimum of 5 student-employee (job positions) with employers during 2020-2021 that afford on-site employment training opportunities for OVR eligible students with disabilities identified by the school district as having a need for a high level of support;
5. to have 25 OVR eligible students with disabilities receive job coaching services for PY 2020-2021; and
6. to have 20 OVR eligible students with disabilities shall be placed in competitive, community integrated employment consistent with their Individual Education Plan (IEP) for PY 2020-2021.

The College and Career Readiness program incorporates college and career readiness supports on a college campus. This Pathway is designed to assist students with disabilities acquire skills necessary in transitioning from high school to a post-secondary education program. Students enrolled in the College and Career Readiness program have identified employment goals which require post-secondary training to secure employment.

The goals of the College and Career Readiness program include:

1. during program years 2019-2020, and 2020-2021, providing college and career readiness instruction to 12 OVR eligible students with disabilities each year; and
2. a minimum of 8 OVR eligible students with disabilities shall be placed in post-secondary educational programs consistent with their Individualized Education Plan for PY 2020-2021.

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.

During school year (2019-20) of the Employability and Career Readiness Program the following occurred: 110 students with disabilities received employability skills, career readiness training and transition services; 21 students participated in at least one form of work-based learning experience; 7 students with disabilities participated in paid work experiences at the School District of Lancaster; and 14 students gained work experiences in the community in partnership with OVR. All students in this program are encouraged to fully participate in OVR services and supports prior to and following graduation.

The College and Career Readiness Program, during the past two school years, provided 7 OVR eligible students with college/career readiness training and transition services, and they were placed in post-secondary education consistent with their IEP.

The effects of the COVID-19 pandemic greatly impacted enrollment of students and delivery of services.

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 the Departments of Education and Human Services more effectively.

OVR previously requested a waiver of statewideness for an IGA entered into with the Berks Career and Technology Center (BCTC) effective October 1, 2014, to provide school-to-work transition services to OVR eligible students with disabilities who are enrolled in approved training programs at BCTC and attend one of 16 public school districts within Berks County. The most recent IGA with BCTC was approved by the BCTC Board of Directors on December 10, 2018, signed by the school's authorized representative, and then fully executed by the Commonwealth on March 7, 2019. BCTC provided 21.3 % of project funding which served as the required local/state match. OVR provided the remaining 78.7 % from federal VR funds. This agreement expired and was converted to a Provider Agreement as of October 1, 2020.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

OVR, as the designated State unit, approved each proposed service before it was put into effect as demonstrated by a fully executed inter-governmental agreement (IGA) between the parties and following guidance in the OVR Fiscal Policy. Based upon 34 CFR §361.50 and the 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.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

All other State Plan requirements of the VR services portion of the State Plan will apply to the services approved under the waiver.

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

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

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS

Current agreements include the following:

1. The Pennsylvania Department of Health (DOH), Department of Labor & Industry (DLI), Pennsylvania Department of Education (PDE), and Department of Human Services (DHS) entered into a Memorandum of Understanding (MOU) in 1999, with a 2006

Addendum, and a Transition MOU addendum in 2010, to devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition.

2. Per WIOA amendments to the Rehabilitation Act, an updated MOU was signed in October 2020 between OVR and PDE to share responsibility to prepare students with disabilities for successful community employment.
3. An MOU is in progress between OVR and the BSE, to share funds for technical assistance positions that will support the MOU between OVR and BSE.
4. A Data Sharing Agreement between OVR and the Office of Developmental Programs (ODP) has been finalized to exchange information on the services delivered to individuals enrolled in DHS ODP programs who also receive or received services through OVR. OVR and ODP are sharing data between the CWDS and the Home & Community Services Information System.
5. OVR and ODP issued a joint bulletin that dictates when an individual receiving Supported Employment (SE) services can move to ODP-funded extended services and documentation requirements.
6. An MOU was initiated between OVR and the DHS Office of Mental Health and Substance Abuse Services (OMHSAS) in 2017, which ends on June 30, 2022. The MOU allows for a funding transfer from DHS to OVR, which supports opportunities for customers with serious mental illnesses and serious emotional disturbances to participate in the Certified Peer Specialist (CPS) training opportunities to achieve competitive integrated employment.
7. An MOU has been developed between OVR and DHS, Bureau of Juvenile Justice Services (BJJS). The MOU was established in May of 2017 to provide pre-employment transition services to adjudicated students and youth placed in Pennsylvania Academic Career Technical Training (PACTT) affiliate locations. The MOU was amended in July 2019 to also include dependent students and youth. OVR has collaborated with the PACTT affiliates to provide the 5 required pre-employment transition services to this vulnerable population to expose them to as many employment and post-secondary options as possible. OVR has provided group and individual services to these affiliates through pre-employment transition services provider agreements with the PACTT affiliate, OVR staff, or an outside provider. OVR has also collaborated with local community colleges to provide post-secondary educational opportunities to residential, community-based, and secure facilities throughout the state.
8. OVR has entered into Institute of Higher Education Agreements with the 14 State owned Universities under the Pennsylvania State System of Higher Education and 14 Community Colleges.
9. VR partners with Pennsylvania Centers for Independent Living (CILs) by executing grants and contracts for CIL's to provide services and outreach projects to individuals with disabilities within community settings.
10. OVR has entered into IGAs with the SDoL, ODP, and OMHSAS for the provision of VR services and referrals.
11. OVR supports a variety of Project SEARCH programs across Pennsylvania that offer educational opportunities for individuals with significant disabilities, primarily

intellectual and developmental. OVR's support is through cooperative agreements with county mental health offices, local school districts, and employers that include hospital systems and local government units.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998

PA-OVR utilizes the following agreements to address the assistive technology needs of customers seeking employment services:

1. Pennsylvania'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 Pennsylvania 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 Pennsylvania'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 assistive technology (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 Letters of Understanding (LOUs) or Administrative Memoranda (AM) agreements for expanded services to customers.

3. 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 a new AM. 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.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

OVR has numerous Provider Agreements and AMs with a variety of service providers serving all populations, including out-of-school youth:

- OVR has developed an On-the-Job Training (OJT) initiative specifically targeting youth. This was entitled "Jobs for All" and allowed a Youth in plan status who starts a non-permanent summer job to have their employer reimbursed for their wages. One occupational sector, large scale amusement and theme parks such as Hershey Park in Derry Township Dauphin Co., DelGrosso's amusement Park and Laguna Splash Water Park in Tyrone, PA., and Dorney Park in Allentown, have offered summer youth served by OVR hundreds of hours of work. These initial employment experiences have helped to build soft skills, a work ethic and work record. Other employers have included

municipalities, seasonal retailers and food service/fast food employment. This initiative included over 230 employers.

- OVR continues to develop more programs to partner with community service providers to target transition aged youth. This includes access to summer jobs through shared employer contacts such as Lowe's, Fed Ex., Fenner Drives, Giant Eagle, McDonalds and Walmart. Recent statewide MY Work experiences for out of school youth include paid work experiences in partnership with local municipalities.
- OVR supports a variety of Project SEARCH initiatives across Pennsylvania. Project SEARCH is a one-year internship program that provides education opportunities for individuals with significant disabilities, primarily intellectual and developmental disabilities. The focus can be on students in their last year of high school, young adults with disabilities, or adults with disabilities. The program takes place at a host business in a healthcare, government, or other business setting where a total immersion in the workplace facilitates the teaching and learning process as well as the acquisition of employability and marketable work skills.

5. STATE USE CONTRACTING PROGRAMS.

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

OVR and 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 Provider (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)'s 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 the commonwealth 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 (IT) 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.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

The School to Work Transition Policy was updated on March 11, 2021. The policy details OVR staff responsibilities regarding Pre-ETS, transition services, outreach, collaboration, and financial responsibility. In regard to coordination with education, OVR will collaborate with 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, 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. Pre-ETS are part of the continuum of services that VR can provide to students with disabilities.

OVR will also designate a liaison to 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. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

OVR and the Pennsylvania Department of Education, Bureau of Special Education (PDE-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, LEA's, 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 Pennsylvania Department of Education, Bureau of Special Education, OVR agrees to:

- provide consultation for transition planning for students with disabilities to facilitate the development of their IEPs. OVR can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- inform and collaborate with Local Education Agencies (LEA) 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; and
- Along with BSE, collaborate on the provision of ongoing joint staff training, such as development and implementation of IEPs, pre-employment transition services, 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-employment transition services 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 THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

OVR can assist the students and youth with a disability transition from school to competitive, integrated employment, or from school to post-secondary training/education that leads to competitive, integrated employment. 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 Pennsylvania 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-employment transition services included in Individualized Education Plans (IEP) when appropriate and that OVR reports on IEP meeting attendance.

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

The MOU outlines the Roles and Responsibilities of each agency:

OVR Responsibilities:

- Provide students with pre-employment transition services 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-employment transition services, 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 single point of contact 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-employment transition services 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 (refer to BSE/OVR Tools and Guidance Document).
- 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 supported employment services to a student in their final 6 months of high school to secure permanent competitive, integrated employment 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-employment transition services.
- Ensure that LEAs collaborate with OVR in determining the student's needed pre-employment transition 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-employment transition services.
- 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 VR State Rehabilitation Council 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-employment transition services 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-employment transition services 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:

- a) all LEA superintendents or chief school administrators;
 - b) all directors of special education;
 - c) all OVR District Administrators;
 - d) the DLI Office of Developmental Programs;
 - e) Pennsylvania Rehabilitation Council (PaRC);
 - f) State Board of Vocational Rehabilitation;
 - g) Right to Education State Task Force and Local Task Forces;
 - h) Client Assistance Program (CAP); and
 - i) 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-employment transition services 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-employment transition services 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 competitive, integrated employment, 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.
- 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 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.

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; and
- 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; and

- 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 competitive, integrated employment programs;
- Workforce Development Boards;
- Parent-Teacher Associations, etc.;
- juvenile justice system;
- foster youth organizations;
- homeless shelters/programs; and
- medical facilities.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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

OVR maintains negotiated LOUs, as well as 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 a 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 the commonwealth.

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.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

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

OVR has coordinated with other State Offices such as ODP, OMHSAS, Office of Long-Term Living (OLTL), 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 supportive employment services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

DLI and DHS are in the process of developing an MOU for SE Services. The MOU for SE services will guide a partnership to establish the collaborative framework for OVR and DHS to develop, expand, and improve opportunities for competitive employment for individuals with disabilities, including individuals with the most significant disabilities. OVR and DHS will fund SE services, including Customized Employment, by committing to the implementation of complementary programs to assist with the provision of these services to individuals with the most significant disabilities, including youth with the most significant disabilities, to enable them to achieve an employment outcome of SE in competitive integrated employment. This MOU will ensure a smooth transition from SE services to extended services.

G. COORDINATION WITH EMPLOYERS

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

1. VR SERVICES; AND

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 agencies, DHS Offices of ODP, OMHSAS, and OLTL, and other 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 competitive integrated employment in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer.
3. OVR will keep the process simple by using a Single Point of Contact (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 seek VR talent across several states and Pennsylvania workforce regions.

The following are OVR employer outreach and networking strategies to work with employers to increase competitive integrated employment 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 CWDS, CSAVR, National Employment Team (VR-NET), and the VR-NET Talent Acquisition Portal;
2. employer outreach by Business Services and Outreach Division (BSOD) Specialists through in-person and/or virtual/telephonic meetings, regional and statewide 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 the Hiram G. Andrews Center (HGAC). HGAC business services staff will identify and coordinate with the referring district Vocational Rehabilitation Counselors (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 (OJT) and other on-boarding supports for OVR customers. Local 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 Business Services and Outreach Division (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, ADA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibility Kit, and the Americans with Disability Act 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 Community Rehabilitation Providers (CRPs) of 14C 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 business services 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 workforce development boards.

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 Pennsylvania Department of Labor and Industry's (DLI's) Center for Workforce Information and Analysis (CWIA) with their district office VR Counselor's (VRC's) to promote career-based IPEs likely to lead to successful employment and skill training to prepare for expansion or 'super' sector jobs in each region of Pennsylvania.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

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 competitive, integrated employment. 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-employment transition services to prepare students for competitive employment. Project SEARCH is one example of this type of collaboration.

H. INTERAGENCY COOPERATION

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

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

In Pennsylvania, the Department of Human Services (DHS) is the agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act. OVR collaborates with this department on a number of initiatives. First, OVR is a key member of the Pennsylvania Employment First State Leadership Mentoring Project (EFSLMP), a project initiated in 2014 and sponsored by a grant administered by the Office of Disability Employment Policy within DHS. The goal of the project is to ensure that the employment needs of individuals with disabilities are met, that cost services are comprehensive, effective, innovative and not duplicative, and that every individual with a disability who wants to work to achieve self-support will be given the opportunity to do so. An OVR representative also participates in the provider Community of Practice conference calls and monthly webinar series developed by the EFSLMP project for partner agencies.

Secondly, OVR participates in cross agency collaboration and coordination with DHS as part of the Pennsylvania Employment First Act (Act 2018-36). This is a Governor inspired initiative to ensure individuals with disabilities have the opportunity to achieve economic independence through competitive integrated employment. Cross-agency collaboration between OVR and DHS' Office of Long Term Living (OLTL) demonstrate continued partnership and commitment to Act 2018-36, where competitive integrated employment, including self-employment, shall be the first consideration and preferred outcome when serving persons with disabilities who are of working age. This cross-agency collaboration between OVR and OLTL is important because agencies may have shared customers who are seeking/receiving employment services to obtain or maintain competitive integrated employment, and overall will increase efficiency and effectiveness across programs. OLTL may fund extended services for customers receiving waiver services through OLTL to assist with long term SE services to maintain competitive integrated employment.

The Office of the Governor, in collaboration with the Governor's Cabinet for People with Disabilities, have developed an initial three-year plan of which OVR and DHS are key participants, along with the Pennsylvania Department of Education (PDE). A few of the priorities of Act 2018-36 include promoting a vision of Employment First for all Pennsylvanians, promoting paid work experiences, ensuring effective use of transition funding, promoting self-advocacy, offering professional training, increasing pre-employment skill development, promoting Discovery and Customized Employment opportunities, and encouraging case information sharing among agencies. OLTL, within DHS, is one of the key agencies, along with OVR, helping to implement the Pennsylvania Employment First Act.

Thirdly, since the Center for Medicaid and Medicare Services Technical guide (Version 3.5, January 2015) was published, OLTL has added Employment Services to their menu of available services. The OLTL program is charged with implementing the Community HealthChoices (CHC) delivery, a capitated Medicare managed care program for adults eligible for Medicaid and Medicare (dual eligible), older adults and individuals with physical disabilities. The Commonwealth rolled out CHC in three (3) regional phases completed in January 2020. Cross-agency collaboration is a vital component to the successful transition.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

In Pennsylvania, the State agency responsible for providing services for individuals with developmental disabilities is DHS/ODP. One of the ways that 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.

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 competitive integrated employment; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

DHS's OMHSAS is responsible for providing mental health services in Pennsylvania. OVR uses many avenues to ensure collaboration and partnership in the delivery of SE and extended services with OMHSAS. An MOU was initiated in November 2017 between OVR and OMHSAS. This MOU provides a goal to increase Certified Peer Specialist (CPS) training opportunities for individuals with mental health conditions. Through the MOU, OVR and OMHSAS will expand training opportunities to those individuals who are deaf and hard of hearing with a mental health condition. These trainings will allow those individuals to obtain competitive integrated employment as a CPS. OVR and OMHSAS agree that assisting individuals with serious emotional disturbances and serious mental illnesses to secure and maintain competitive integrated employment includes: paid work experiences; training; postsecondary education; seamless transition from secondary education to adult life; outreach and awareness activities targeted to individuals, families, and businesses; pre-employment activities; and other programs and initiatives that lead to or result in competitive integrated employment. Individuals with mental health impairments continue to comprise a large percentage of the impairment cause in our open cases on an annual basis. OVR will continue to offer, through IPEs, services for restoration, guidance and counseling, training, placement assistance, and employment supports to help individuals with mental health impairments achieve a competitive integrated employment outcome.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

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

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

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

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

The OVR Recruitment and Retention Specialist collects and analyzes, on an annual basis, data on qualified personnel needs and personnel development. OVR works through the Pennsylvania Office of Administration Human Resources Division for managing personnel issues and filling vacant positions.

As of November 5, 2021, OVR had 815 filled salaried positions and 217 vacancies. This figure includes 149 filled salaried positions at the Hiram G. Andrews Center. Statewide, OVR had a total of 313 filled Vocational Rehabilitation Counseling Professional positions (includes Vocational Rehabilitation Counselors, Vocational Rehabilitation Counselors for the Deaf and Hard of Hearing, Vocational Rehabilitation Counselor Trainees, and Vocational Rehabilitation Counselor Interns), 19 Vision Rehabilitation Therapist positions, and 9 Orientation and Mobility Specialists positions. OVR continues to evaluate each salaried position prior to posting for hire to ensure that it is essential to operations before approving the position.

In relation to the number of employees within OVR, the number of OVR customers who had an open VR case as of June 30, 2021, was 45,535 individuals.

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

OVR is in need of the following personnel, by category:

- VRCs (includes VR Counselors for the Deaf and Hard of Hearing): 394 positions
- Vision Rehabilitation Therapists: 19 positions
- Orientation and Mobility Specialists: 14 positions

OVR continues to closely monitor hiring. The VR Specialist for Recruitment and Retention assists OVR Managers to evaluate each position prior to posting for hire and works in close coordination with the Human Resources Division within the PA Office of Labor and Industry. OVR regularly reviews staffing patterns and caseload size in relation to the number of individuals seeking services to determine coverage needs. Projection data indicates that there is an existing population of students with disabilities transitioning from school to post-secondary activities, including work that may require additional staff to adequately serve. These requirements will also be monitored and adapted to meet any changing needs.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Projections by personnel category are as follows:

- VRC (includes VR Counselors for Deaf and Hard of Hearing): 40 projected vacancies in next 5 years;
- Vision Rehabilitation Therapist: 3 projected vacancies in next 5 years; and
- Orientation and Mobility Specialists: 3 projected vacancies in next 5 years.

OVR projects that in the next five years, approximately 40 VRCs will become eligible to retire. This will be an average of 10 VRCs retiring per year, in addition to an unknown number of counselors who leave as part of general turnover. Additional numbers of new VRC's 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.

B. PERSONNEL DEVELOPMENT

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

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The OVR Recruitment Specialist maintains regular contact with the institutions of higher education within Pennsylvania who offer programs to develop VR professionals and annually collects information on student enrollment. There are four Pennsylvania Universities that are accredited by the Council on Rehabilitation Education (CORE) and the Council Accreditation of Counseling and Related Educational Programs (CACREP): Pennsylvania State University, University of Pittsburgh, University of Scranton, and Edinboro University of Pennsylvania. When these universities are combined, these programs graduate approximately 52 students per year with a master's degree in Rehabilitation Counseling. See chart below.

Table 1: CORE & CACREP Universities - Enrollment and Graduate Numbers

Institutions	Students Enrolled	Graduates sponsored by RSA	Graduates from the previous year
Penn State University	11	6	19
University of Pittsburgh	29	0	18
Edinboro University of PA	10	0	6
University of Scranton	19	0	10

A student successfully achieving graduation from one of these universities would be eligible to apply for the Commission on Rehabilitation Counselor or CRCC certification exam, a nationally recognized professional certification in the field of vocational rehabilitation.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

Information provided in section i.1.B.i.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR

WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Information provided in section i.1.B.i.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

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

OVR Counselor Recruitment

As a direct result of the Covid-19 pandemic, all Pennsylvania Commonwealth agencies (including OVR) were placed under a hiring freeze as of March 2020. Since this directive was initiated by the PA Governor (Tom Wolf), OVR has been unable to hire VRC Interns and new VRC's from March 2020 to present. The VR Specialist responsible for recruitment and retention of employees has been working diligently with the HR liaison and the Office of Administration in developing and implementing a strategic plan for recruitment.

In addition to the available students graduating from in-state programs, OVR's VR Specialist responsible for recruitment can recruit students from CORE/CACREP-approved universities that offer a master's degree in Rehabilitation Counseling nationwide. Pennsylvania 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 have a master's degree in 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 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 Pennsylvania. 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, University of the District of Columbia, Fort Valley State University, Southern University and A&M College, Coppin State University, University of Maryland Eastern Shore, North Carolina A&T State University, Winston-Salem State University, and South Carolina 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 appointed membership on Coppin State University and the University of Maryland Eastern Shore Rehabilitation Counseling Program Advisory Committees. Both are HBCUs in the Mid-Atlantic region that prepare increased numbers of minority individuals for careers in the public VR program. OVR will also maintain a membership commitment to local advisory committees with Edinboro University;
- maintaining active membership with the National Association of Multicultural Rehabilitation Concerns (NAMRC) and the National Council on Rehabilitation Education (NCRE); and
- visiting colleges, universities, and appropriate job fairs in conjunction with the DLI Office of Equal Opportunity to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

Orientation and Mobility Specialists and Vision Rehabilitation Therapists

OVR recruits from accredited university programs in Pennsylvania that train Orientation and Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including: Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. These programs graduate a combined total of approximately 35 students per year. Graduates of these approved university programs are eligible for certification in Vision Rehabilitation Therapy or in O&M from the Academy for the Certification of Vision Rehabilitation and Education Professionals. 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 Pennsylvania.

OVR's Bureau of Blindness and Visual Services (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.

VRC Trainee

As of May 1, 2021, OVR decided to discontinue the Vocational Rehabilitation Counselor Trainee (VRCT) position. The decision to discontinue this position was determined on the low number of applicants and the inability to retain these positions successfully.

3. PERSONNEL STANDARDS

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

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -
RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE
REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH
PERSONNEL ARE PROVIDING VR SERVICES; AND

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 (CRC's). Specifically, all newly hired VRCs are 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 Pennsylvania Civil Service Announcement for VRC positions became effective on October 4, 2002. As of May 2019, a total of 846 VRCs and VRC Interns were hired under the new entry-level requirements. All 856 new VRCs and Interns met CSPD standards for qualified rehabilitation professionals upon being hired.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger is 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 vocational rehabilitation. 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.

Currently, OVR is maintaining its primary standards in hiring candidates with a Master's Degree in the mentioned fields; however, OVR is strongly considering a review of the current Minimum Education and Training (METs) for the entry level VRC as it relates to the CACREP standards.

As a result of the CORE/CACREP merger, OVR has been working with the PA Office of Administration (OA) in redesigning its recruitment plan for hiring master level qualified candidates. Within this redesign, and following RSA standard (34 CFR §361.18(c)(2)(A)(1), OVR is in the final stages of working to revamp our METs requirements in the hope of expanding our candidate pool and allow us to decrease our vacancies in addition to increasing our visibility amongst all CORE/CACREP programs nationwide. OVR and OA are cross-referencing all CORE/CACREP master level correlated programs regarding the expansion of our entry level VRC positions that will include more degree options: Social Work, Human Services, School Counseling, Clinical Counseling and others considered closely related. 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 Recruitment Specialist actively recruits qualified VRC's, including those with disabilities, individuals from diverse cultural backgrounds, and underrepresented groups, and from all CORE/CACREP programs nationwide. The Recruitment Specialist 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 and Hard of Hearing and Counselors for the Blind and 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.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

OVR ensures that personnel have a 21st-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, 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 competitive integrated employment 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.

4. STAFF DEVELOPMENT

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

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services. OVR will continue to provide for the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

With the implementation of WIOA amendment to the Rehabilitation Act, overall training areas include: (1) Functional Limitations, Employment Implications, and Accommodations; (2) Vocational Assessment: Tools, Interpretation, and Application; (3) Counseling and Guidance; (4) Caseload Management, Case Practices, and Service Planning; (5) Employer Engagement, Job Development and Job Placement; (6) Diversity, Inclusion, and Multicultural Competency; and (7) Leadership Development.

OVR routinely schedules trainings based on updates to policies and procedures to ensure staff have accurate and up to date information regarding job duties. Recent collaboration occurred with the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) at the Interwork Institute at San Diego State University to offer all OVR employees the opportunity to participate in a staff training needs assessment. The purpose of this assessment is to identify where the greatest needs are for staff training so that OVR can identify and develop resources to meet those training needs. In addition, OVR will continue to develop and complete an internal survey to determine additional training needs identified by professional and paraprofessional staff. OVR is committed to focusing on certain priorities identified as "Customer Service," "Ethics," "Confidentiality," and "Transition" as they relate to the primary training topics outlined by WIOA.

OVR also refers employees, as needed, to Temple University's Assistive Technology Lending Library (ATLL). This is a program facilitated through the Institute on Disabilities at Temple University, "TechOWL". ATLL is Pennsylvania'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 assistive technology (AT) topics. Any of these activities are available to Pennsylvanians with disabilities which includes OVR staff and clients, often at no charge.

OVR continues to collaborate with Penn State University on the 2018-2020 Diversity & Inclusion Project. The research for this initiative has been completed as of March 3, 2019. All focus groups, key informant interviews and statewide assessments have been concluded as of December 2018. All data has been reviewed and compiled, and a written report with recommendations was submitted to the OVR Executive Team and prospective unions in early April 2019. The recommendations will serve as a framework for professional trainings for advancing OVR's diversity and inclusion goals. These trainings will define: the concept of diversity and inclusion; understanding barriers for underrepresented/underserved

populations; an outline of the value and importance of diversity and inclusion; and provide substantial resources for our staff in providing services to the communities we serve.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

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 Vocational Rehabilitation (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 including the National Technical Assistance Center on Transition: The Collaborative (NTACT:C) and the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM).

OVR supports various training opportunities and coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and 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.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

Most OVR district offices have at least one Rehabilitation Counselor for the Deaf and Hard of Hearing population. Entry-level requirements for Rehabilitation Counselors for the Deaf and Hard of Hearing require that candidates pass the Sign Language Proficiency Interview before offered a formal interview for employment. OVR district offices, in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRC 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. This includes recommendations and assistance provided by the OVR Advisory Committee for Persons who are Deaf and Hard of Hearing and the Advisory Committee for the Blind of Pennsylvania. In addition, OVR has a Rehabilitation Specialist assigned to coordinate the Deaf, Hard of Hearing

and Deaf-Blind Program in OVR. This specialist assists with recruitment and 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.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

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

Transition Counselors and ERCs within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's 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.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

OVR contracted with the Institute on Disabilities at Temple University, Pennsylvania's University Center for Excellence in Developmental Disabilities, to conduct and interpret the Comprehensive Statewide Needs Assessment (CSNA) required for PY 2015-2018. This is the most recent completed assessment. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in the commonwealth. 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 2019-2022, again with the Institute on Disabilities, Temple University. This new project was initially affected and temporarily slowed by the Covid-19 pandemic, but innovative thinking and creative planning have helped to move the project

back on track to meet projected deadlines for a final report expected before September 2022. 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 2023-2024.

Comparison of Pennsylvania to National Population Statistics

See 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 Pennsylvania and across the nation in 2014 and 2016 (2014 and 2016 1-Year Estimates of the American Community survey).

Table 2: Comparison of Pennsylvania to National Population Statistics

Disability Identification across demographic variables	U.S. % Est (2014)	U.S. % Est (2015)	U.S. % Est (2016)	U.S. % Est (2017)	PA % Est (2014)	PA % Est (2015)	PA % Est (2016)	PA % Est (2017)
Total civilian noninstitutionalized population	12.6	12.6	12.8	12.7	13.8	13.9	14.2	14.1
Population under 5 years	0.8	0.8	0.7	0.7	0.6	0.7	0.5	0.9
Population 5 to 17 years	5.4	5.4	5.6	5.5	7.1	6.8	7.1	7.0
Population 18 to 34 years	10.5	6.0	6.3	6.4	11.2	6.9	7.3	7.0
Population 35 to 64 years	10.5	13.0	13.1	12.7	11.2	13.8	14.2	13.9
Population 65 years to 74 years	36.0	25.4	25.3	25.0	34.6	24.0	24.6	24.0
Population 75 years and older	36.0	49.8	49.5	48.7	34.6	47.9	48	47.9
Male	12.5	12.5	12.7	12.6	13.6	13.4	14.1	13.8
Female	12.8	12.7	12.9	12.8	14.0	14.3	14.4	14.4
White alone	13.1	13.1	13.4	13.3	13.8	13.8	14.3	14.1
Black or African American alone	13.8	14.0	14.1	14.0	15.5	16.6	16.0	16.6
American Indian and Alaska Native alone	16.3	16.8	17.0	17.3	24.6	24.8	23.8	20.8
Asian alone	6.9	6.9	7.1	7.1	6.3	7.1	7.0	7.0
Native Hawaiian and other Pacific Islander alone	-	10.6	11.1	10.3	-	27.7	N	N

Disability Identification across demographic variables	U.S. % Est (2014)	U.S. % Est (2015)	U.S. % Est (2016)	U.S. % Est (2017)	PA % Est (2014)	PA % Est (2015)	PA % Est (2016)	PA % Est (2017)
Some other race alone	8.2	8.0	8.3	8.0	16.0	13.6	14.0	12.7
Two or more races	11.1	10.9	11.3	11.1	13.5	11.4	13.5	13.0
White alone, not Hispanic or Latino	13.9	13.9	14.1	14.0	13.8	13.8	14.4	14.2
Hispanic or Latino (of any race)	8.8	8.8	9.1	9.0	14.3	14.1	14.0	12.7

Source: 2015-2017 American Community Survey 1-Year Estimates

Compared to the estimated national rate of disability identification in 2014 (12.6%), 2015 (12.6%), 2016 (12.8%), and 2017 (12.7%), Pennsylvania has a slightly higher rate of disability identification in its total civilian population (13.8% in 2014, 13.9% in 2015, 14.2% in 2016, and 14.1% in 2017). Up until 2014, the Census reported upon disability identification for those 18-64 years old (10.5% in U.S. and 11.2% in Pennsylvania) and 65 and older (36.0% in US and 34.6% in Pennsylvania). Beginning in 2015, the Census began reporting disability identification rates for 18-34 years old, 35-64 years old, 65-74 years old, and 75 years and older. In 2015, Pennsylvania civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (Pennsylvania: 6.9% and 13.8% vs. U.S.: 6.0% and 13.0%). This trend continued in 2016, with Pennsylvania civilians ages 18-34 years old (Pennsylvania: 7.3% vs. US: 6.3%) and 35-64 years old (Pennsylvania: 14.2% vs. U.S.: 13.1%) and in 2017 with, Pennsylvania Civilians ages 18-34 years old (Pennsylvania: 7.0% vs. US: 6.4%) and 35-64 years old (Pennsylvania: 13.9% and US:12.7%).

The estimated percentage of individuals who identified as having a disability in the labor force was 40.7% nationally, compared to 40.9% in Pennsylvania. The national average of individuals identifying as having a disability who were employed in 2014 was 34.5%, and 34.7% in Pennsylvania. The rate of unemployment for individuals with disabilities across the United States was 14.9%, compared to 15.1% in Pennsylvania in 2014 (American Community Survey, 2014).

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 IPE Initiated, Transition Services for youth and students with disabilities, and for those currently undergoing job coaching. 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. WHO ARE MINORITIES;

According to the 2010-2014 American Community Survey 5-Year Estimates, and evaluated as part of the CSNA, 81.8% of Pennsylvanians with disabilities identify as Caucasian or white;

12.4% of Pennsylvanians with a disability identify as African American; 6.2% of Pennsylvanians with disabilities identify as Hispanic or Latino; 0.3% of Pennsylvanians with a disability identify as American Indian and Alaska Native; and 1.4% Pennsylvanians with a disability identify as Asian/Pacific Islanders.

Additional qualitative data was collected as part of the CSNA through site visits to district offices and face-to-face interviews with VR administrators. During these interviews, OVR staff suggested that a lack of English fluency had not presented significant barriers to ethnic and cultural minorities in receiving services and supports in Pennsylvania. Administrators and VRCs at multiple district offices cited familiarity with and access to Language Line interpretation services, but infrequent need to use the service. According to the October 2015 Census Report "Detailed Language Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Pennsylvania: 2009-2013," only about four percent of those individuals reportedly speak English less than "very well." Consequently, lack of utilization of interpretation services may align with statewide language demographics, but may also signal a population underserved by OVR. Attention to this potential disparity is imperative as multiple VRCs identified that they served refugee communities, many of which come from countries with official languages other than English. Findings were that OVR staff could benefit from trainings oriented to cultural competency regarding the Pennsylvania Dutch, Amish, and Quaker populations, as well as refugees. Related training is being considered and will be developed in the near future.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The most recently completed CSNA found that individuals with disabilities that are considered unserved and/or underserved in Pennsylvania include those with multiple disabilities (such as deaf/blind), those in rural areas, transition age youth, individuals with disabilities that are concurrently customers of other state systems (such as corrections, educational, and/or other human services systems), minorities, and veterans. Survey results from CRPs indicated that the most underserved communities, in order of significance, are customers with dual diagnoses, followed by aging customers, those in the criminal justice system (victims, defenders or parolees), those with low socioeconomic status, immigrants, and non-English speaking or English as a second language customers. Youth were ranked as the least underserved, followed by veterans, rural communities, racial or ethnic minorities, and finally state center residents.

Many individuals reported difficulty accessing reliable transportation services that affects their ability to attend job training programs, job interviews, and to consistently get to and from a work site.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

OVR staff work closely with our PA CareerLink partners in the State Workforce Development System. CareerLink offices are one-stop facilities in Pennsylvania that assists individuals seeking Commonwealth and employment services, and where workforce development professionals focus on employment with an emphasis on high demand occupations. Information gathered from the CSNA indicates that although OVR and the Statewide Workforce Development System work collaboratively, have similar goals, and are cross-purposed, the CareerLink targets occupations of high demand where OVR targets customers' employment goals. It's suggested that in order to best serve the dual customer, VRCs may benefit from receiving cross-training on high demand occupations. It's also suggested that since the CareerLinks and OVR gather the same information on a customer, these programs can benefit from policies that facilitate better data sharing.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES,
INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION
SERVICES OR OTHER TRANSITION SERVICES.

In the CSNA, transportation was cited by OVR customers, family members of individuals with disabilities, employers, and OVR staff members as the most important need/barrier for youth and students to access employment and job training services.

During the CSNA cycle, OVR, in collaboration with PaRC, developed and began using a customer satisfaction survey for transition age youth. These surveys are sent out to randomly selected transition age youth on a monthly basis. OVR reviews the results of these surveys and shares this information with the PaRC and OVR leadership. An informal review of the responses is currently being done on a quarterly basis by OVR staff and PaRC during PaRC Policy and Customer Satisfaction Committee meetings. Information received through this review highlights the important role communication plays in the relationship between counselor, the student, their family, and the education system. Transportation services and communication with transition age youth and their families will be an important focus for OVR staff working with this population.

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

According to results in the CSNA, through DLI, there are currently 106 certified CRPs operating in Pennsylvania, placing the commonwealth in the 94th percentile of number of established CRPs throughout the United States. As of August 2017, Pennsylvania ranks only below Ohio, Illinois, and California. CRPs are private, community-based, non-profit organizations that provide rehabilitation services to individuals with disabilities. While Pennsylvania is fortunate to have a sufficient number of CRPs, there were gaps in services noted from the CSNA. One of the greatest needs identified by the CSNA is the lack of transportation services for individuals with disabilities, especially for those living in rural communities. Some of the specific barriers identified include: lack of flexibility with scheduling and planning for para-transit services; lack of reliability and consistency with para-transit services; lack of cultural competency and awareness for disability on the part of transportation workers; a general assumption that people with disabilities have no interest in employment or being active; and lack of institutional or societal interest or investment in transportation for people with disabilities.

Interagency referrals are another area identified as a problem for individuals with disabilities seeking services from multiple agencies. The referral process for each organization or CRP in Pennsylvania is different and can be overwhelming for individuals with disabilities. There is a workgroup currently facilitated through the PA Workforce Development System, which OVR participates in, that is looking at ways to improve co-enrollment across funding streams.

The Hiram G. Andrews Center is the State-owned and operated comprehensive rehabilitation center in Pennsylvania, similar to a community rehabilitation program, they provide necessary vocational rehabilitation services to individuals with disabilities. HGAC provides a comprehensive program of services including the integration of pre-employment transition services, education on campus at the Commonwealth Technical Institute, vocational counseling, vocational evaluation, and physical restoration in a barrier free environment for individuals with disabilities leading to competitive integrated employment. 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 RSA for related costs that exceed the capital expenditure threshold used by the State.

**3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR
TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE
EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES
PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT**

As part of the 2015-2018 CSNA, The Institute on Disabilities at Temple University 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. Ten people responded to this survey and six individuals from six distinct organizations working within Pennsylvania were interviewed. All respondents reported they provide work-based learning experiences, with 7/10 offering workplace readiness training and job shadowing, followed by 30% offering self-advocacy training, 20% offering job exploration counseling and post-secondary counseling and enrollment, and finally 1 respondent offering independent living skills training. The researchers offered positive feedback that Pre-ETS services introduces eligible and potentially eligible students to VR services and supports earlier, and subsequently engage students in the VR intake process sooner and often with more direct school support. Some of the needs and barriers identified relate to the engagement of students and schools, including scheduling time with students, challenges related to the VR intake process, students' transition timeline, and inadequate family support. The CSNA recommendation is that OVR work to develop more holistic and equitable relationships and communication with school districts across the commonwealth to grow quality, selection, and knowledgeability of pre-employment transition services options and to improve access and connection to the workforce development system under WIOA.

More specifically, it was suggested that educational and VR professionals collaborate better and more frequently to provide post-secondary education counseling and enrollment assistance to students with disabilities. Additionally, there were some inconsistencies across VR offices related to intake protocol, wait times, and messaging can impede Pre-ETS service provision. OVR is working on improving the standardization of practice among district offices to improve service delivery to eligible and potentially eligible students with disabilities.

CSNA interviewees also cited it's essential that schools make the connection between students and OVR. OVR's presence in schools, as part of a network of service providers including the special education coordinator, teachers, paraprofessionals, and aids, and active registration of students, improves student outcomes. Fortunately, OVR has a regular and strong presence of ERC's, Transition Counselors, BSRs, and VRCs who visit and interact with local school districts on a consistent basis. Since the implementation of WIOA, these relationships have continued to strengthen and OVR is considered an important ally in transition planning. OVR staff attend IEP meetings, meet with students and parents individually, and provide a wide array of pre-employment transition services per the WIOA amendments to the Rehabilitation Act. Pre-employment services to students have significantly increased from the time of the prior CSNA to present and are expected to continue to be elevated in the next CSNA cycle.

Over the next two years using information from the CSNA assessments, OVR will be evaluating the need, and considering establishing agreements with the following governmental entities: PA Department of Education, DLI Apprenticeship Office, agreements with 10 local Work Force Development Boards, an agreement with the Commonwealth's Office of Administration, and an agreement with Human Resources within the Office of Administration.

An MOU is being developed between OVR and the PA Department of Education's Bureau of Special Education to increase engagement of students with the most significant disabilities. The MOU will enable the creation of a Transition Employment & Agency Mentor – Navigators (Team Navigator) within each Intermediate Unit (IU). OVR, subject to availability of funds, will jointly provide funding over four (4) years to be used exclusively for the operation and administration of technical assistance.

An agreement is being considered with the DLI Apprenticeship Office for the use of matching funds to promote pre-apprenticeship and apprenticeship pathways for OVR customers that will allow them to achieve quality employment outcomes at high wages.

In addition, OVR will explore the development of agreements with 10 local Workforce Development Boards under the Commonwealth's Workforce Development Program to pilot a jointly-funded Disability Employment Initiative that will allow the creation of disability navigators to work closely with OVR Vocational Rehabilitation Counselors to serve students, youth, and adults with disabilities.

OVR will also explore an agreement with the Commonwealth's Office of Administration to develop accessibility testing through the use of Information Technology Accommodation Personnel throughout all OVR combined District Offices. Accessibility testing verifies that digital content and services are usable by people with disabilities. Information Technology Accommodation Personnel will also coach, mentor, and train others who are learning to do accessibility testing.

Finally, OVR will explore an agreement with Human Resources within the Office of Administration for the development of a Career Transition Professional (CTP). The CTP may serve as the Commonwealth of PA Employer Single Point of Contact (SPOC) in the recruitment, retention, and onboarding of all individuals with disabilities that meet the employer identified requirements for employment.

K. ANNUAL ESTIMATES

Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

According to the 2017 Disability Status Report for Pennsylvania published by Cornell University's Institute on Employment and Disability, more than 855,000 individuals ages 21 to 64 (working age) in Pennsylvania reported one or more disabilities, representing 11.8% of the working-age population in the state (Source: 2017 Disability Status Report – Pennsylvania, Yang-Tan Institute on Employment and Disability, Cornell University, using data from the U.S. Census Bureau's American Community Survey). In the 2020 Vocational Rehabilitation Highlights, OVR reported that 22,327 students, age 12-21 received Pre-Employment Transition Services from OVR in PY 2019.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

PY 2020: 46,596. *The actual number of OVR customers in all categories who received services in PY 2020 was 43,538. The original projection was made pre-Covid.

PY 2021: 43,000. Effective July 1, 2021 OVR again opened the closed Order of Selection based on a positive financial outlook. As a result, referrals from the PA Office of Developmental Program and the PA Office of Long-Term Living are expected to increase.

PY 2022: 46,000. OVR is hopeful to return to pre-Covid-19 service provision levels as the commonwealth continues to advance out from under Covid restrictions.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The following estimates project the number of individuals expected to be served annually during PYs 2021-2024 for each of the priority categories within the SE Program (Title I and Title VI Funds):

Total anticipated to be served annually during PYs 2021-2024: 5,463

Annual estimates of the number of SE customers to be served and projected Title VI expenditures during PYs 2021-2024:

- Anticipated Total Number to be Served via Title VI Funds: 245
- Anticipated Annual Expenditure – Title VI Funds: \$600,000
- Total Number Served under Age 25 via Title VI Funds: 245
- Anticipated Annual Expenditure – Title VI Funds (under age 25): \$600,000

Annual estimates of the number of SE customers to be served and projected Title I expenditures during PYs 2021-2024:

- Anticipated Total Number to be Served via Title I Funds: 5,343
- Anticipated Annual Expenditure – Title I Funds: \$8,318,140

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

PY 2021-2024, annually:

- Most Significant Disability: 43,000 in PY 2021 increasing to 46,000 in future years as customers are released from the OOS waitlist.
- Significant Disability: 12
- Non-Significant Disability: 12 in PY 2021 decreasing to 0 over future years as existing cases are closed.

(Total = 46,000)

Using both current and historical data, OVR projects that 46,000 individuals categorized as having a Most Significant Disability, 12 individuals categorized as having a Significant Disability, and 12 individuals categorized as having a Non-Significant Disability will receive services annually during PYs 2021-2024. OVR also projects that the number of individuals categorized as having a Significant and Non-Significant Disability, who are currently receiving services, will decline over the next four years as their cases are closed. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of all categories.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

OVR closed the OOS for all priority categories effective July 1, 2019. As of the end of PY 2019, there were a total of 3,010 customers eligible for VR services who were on a waitlist and not receiving such services due to the closing of the OOS: 2,097 designated as Most Significant Disability, 100 designated as Significant Disability, and 3 designated as Non-Significant Disability. At the end of PY 2020, there were a total of 9,244 customers eligible for VR services who were on a waitlist and not receiving such services due to the closing of the OOS: 8,459 designated as Most Significant Disability, 739 designated as Significant Disability, and 46 as Non-Significant Disability. As of July 26, 2021 6,578 customers eligible for VR services who were on a waitlist and not receiving such services due to the closing of the OOS: 6,071 designated as Most Significant Disability, 484 designated as Significant Disability, and 23 designated as Non-Significant Disability.

On July 1, 2021 OVR opened the closed Order of Selection for all priority categories for an indefinite period of time based on a positive financial availability. OVR had sent a letter to all eligible individuals who were still on the waitlist asking them to contact their vocational counselor to initiate services. Vocational Rehabilitation Counselors are also asked to make strong attempts to reach out to any customer who is still on the waitlist but has not yet initiated contact for services. It is anticipated that all individuals will be removed from this waitlist by the end of PY 2021.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

1. For the Most Significant Disability category, the number projected to be made eligible is 11,000 for PY 2021, and 17,000 for PY 2022 and 2023. The number served will be 46,000 for each program year. The number rehabilitated will be 7,000, of which 100% will be rehabilitated into the competitive labor market. The total cost of services is expected to be approximately \$46,000,000.
2. For the Significant Disability category, the number projected to be eligible for services annually is 1,000. The total cost for services is expected to be approximately \$1,000,000.
3. For the Non-Significant Disability category, the number projected to be made eligible annually is 0, while the number served will be 12. OVR does not anticipate opening the Non-Significant Disability category to receive services during the next four years. The number of individuals in this category will decrease to 0 as cases are closed. Expenditures under this category will be negligible and isolated to services provided for the currently open cases, outreach, processing of new applications, and eligibility determinations.

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

The state goals and priorities for the VR Services Portion of the Pennsylvania Combined State Plan were initially developed jointly with OVR Executive staff and the PaRC Policy and State Plan committee during a teleconference meeting exchange on May 10, 2019. Another virtual meeting was held on April 28, 2021 between members of the PaRC Policy/Executive

Committees and OVR Leadership to review updates for the 2-year modification of the VR Services Portion of the State Plan. A minor addition was made to goal #2, subgoal 3. Any projections, program continuations, etc. in this description are subject to the availability of funding in the plan year.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

Goal 1: Increase Competitive Integrated Employment Opportunities for Individuals with Disabilities

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.
2. Partner with the BWPO and individual local CareerLink administration bodies to ensure programmatic and physical accessibility of the PA CareerLink centers for equal access for individuals with disabilities.
3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

Goal 2: Increase Transition Services for Students with Disabilities

1. Develop summer and after school Pre-ETS programming to prepare Students with Disabilities for a seamless transition from secondary school to CIE.
2. Increase opportunities for students to gain workplace skills and community-integrated work experiences.
3. Enhance collaborative relationships with Department of Human Services, Pennsylvania Department of Education, higher education institutions, the PA Employment First Oversight Commission, and Community Rehabilitation Providers.

Goal 3: Increase Community Education and Outreach.

1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.
2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.
3. Promote accessibility and technology based upon universal design principles.

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 the Hiram G. Andrews Center, 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.
2. Increase opportunities for students through capital projects, including new classrooms, upgrades to existing classrooms and updated campus features.
3. Promote accessibility and technology through capital improvements based on universal design principles.

4. Expand the availability of services and education offered through the Hiram G. Andrews Center.
5. Phased renovation of the dormitories at the Hiram G. Andrews Center

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

These goals were developed using the 2016-2018 CSNA which included targeted goal areas on: customer satisfaction; increasing services and support opportunities for students and youth with disabilities; identifying barriers and strategies to improve services to the broad spectrum of ethnic and cultural minorities with disabilities; development of more holistic and equitable relationships and communication with school districts across Pennsylvania; and supporting the use of new technology to benefit customer service.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

Section 116 of WIOA establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served by the workforce development system's six core programs, one of which is vocational rehabilitation programs.

These Performance Indicators are:

1. Employment Rate, 2nd Quarter After Exit - The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program.
2. Employment Rate, 4th Quarter After Exit - The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.
3. Median Earnings, 2nd Quarter After Exit – The median earnings of participants who are in unsubsidized employment during the second quarter after employment from the program.
4. Credential Attainment – The percentage of participants enrolled in an approved education or training program who attain a recognized postsecondary credential, or a secondary school diploma, or its recognized equivalent during participation or within one year of exit. Participants must have exited the program to be counted as having attained a credential. Additionally, those earning secondary school diplomas must either be employed or enrolled in a postsecondary program to be counted. Baseline data upon which PA OVR will be evaluated was collected in PY2020.
5. Measurable Skill Gains – The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized

postsecondary credential or employment and who are achieving measurable skill gains defined as documented academic, technical, occupational, or other forms of progress towards such a credential or employment. The definition of allowable types of measurable skills games is specified by RSA and depends on the type of program in which the customers is enrolled.

6. Effectiveness in Serving Employers – This Performance indicator is currently under joint development by the U.S. Department of Labor and the U.S. Department of Education. It will eventually consider a combination of reportable information such as retention with the same employer, the number of businesses that repeatedly hire program participants, and the degree to which program participants are represented across the full range of employers in the state economy. Federal baselines have not yet been established for this indicator and is currently not reported in the annual RSA ETA-9169 report for the state.

Using guidance received in TAC-22-02 related to performance goals and instructions for the core programs, OVR will be establishing these measures and negotiating with RSA to confirm expected performance levels.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

OVR was the subject of an RSA monitoring visit in August 2019 and received its subsequent Monitoring Report from RSA on 11/13/2020. The report contained six findings and sixteen related corrective actions to be addressed by OVR. OVR submitted its initial Corrective Action Plan (CAP) to RSA on 1/12/2021. On 7/28/2021 OVR's CAP update for the quarter ended 6/30/2021 was forwarded to RSA for review/comment. RSA replied on 8/20/2021, noting that OVR had successfully resolved four corrective actions, as well as partially resolving an additional four corrective actions. OVR's next quarterly update is due to RSA by 10/31/2021.

OVR received a letter dated May 20, 2019, from PaRC expressing their concern about the closing of the Most Significant Disability category of the OOS. OVR appreciates and understands this position and is commitment to reviewing the fiscal situation on a quarterly basis and making necessary programmatic and fiscal changes to keep the OOS open, for as long and often as possible, for the Most Significant Disability category.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AN ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

The Pennsylvania Office of Vocational Rehabilitation will continue to implement an Order of Selection. OVR has been on a OOS since March 1, 1994. On July 1, 2019 OVR added the MSD category to be included in the closed Order of Selection. The categories below describe the Order to be followed in selecting eligible individuals to be provided VR services.

First Priority: Most Significant Disability; **Second Priority:** Significant Disability; **Third Priority:** Non-Significant Disability.

Description of priority categories

First Priority: Most Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit three or more of the individual's functional capacities; 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.

Second Priority: Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit one or more of the individual's functional capacities; and
- the individual must be expected to require multiple 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: Non-Significant Disability

- The individual has a physical, mental, or sensory impairment that does not meet the definition for Most Significant Disability or Significant Disability.
- any duration of residency requirement, provided the individual is present in the State;
- type of disability;
- age, gender, race, color or national origin;
- source of referral;
- type of expected employment outcome;
- the need for specific services or anticipated cost of services required by an individual; or
- the income level of an individual or an individual's family.

Pre-Employment Transition Services and the OOS:

Students, families, advocates, and educators are advised to carefully consider the need to begin pre-employment transition services as early as possible in the transition process, and prior to an eligibility determination. Potentially eligible students with disabilities (i.e. students who may or may not have applied for VR services (non-applicants and applicants) that only receive pre-employment transition services) will not be affected by the OOS and will continue to receive pre-employment transition services.

B. THE JUSTIFICATION FOR THE ORDER

The Rehabilitation Act, as amended, requires that an OOS for services be instituted any time that limited resources impede the agency from providing services to all eligible individuals. The OOS in Pennsylvania gives priority first to individuals with Most Significant Disability; second to individuals with Significant Disability; and third to individuals with Non-Significant Disability.

Since March 1, 1994, OVR has operated under some level of an OOS. From 1994 to 2010, OVR was on an OOS and provided VR services only to customers who had a Most Significant Disability. In October 2010, with the availability and use of ARRA funds, OVR expanded the OOS to include individuals who have a Significant Disability. In 2012, Consistent with OVR's policy on the OOS, OVR evaluated its ability to meet the second priority category and, from a fiscal and programmatic standpoint, OVR determined that it was unable to continue to provide services to individuals with a Significant Disability. On Monday, April 23, 2012, the Significant Disability and Non-Significant Disability categories were closed to all new customers. OVR continued serving only Most Significant Disability customers from 2012 until 2019 when new WIOA amendments to the Rehabilitation Act required that the Designated State Unit must expend at least 15% of a state's federal allocation for VR (which averaged approximately \$20 million annually for OVR) to be set aside for pre-employment transition services for students with disabilities between 14-21 years of age. This reserve resulted in decreased funding being available for other existing programs.

The WIOA amendments to the Rehabilitation Act prohibit restricting the provision of pre-employment transition services, which resulted in Pennsylvania's program enrollment nearly doubling from 13,946 in fiscal year 2016 to 25,601 in fiscal year 2017 – with the cost to provide these services far exceeding the 15% set-aside. OVR has had to invest approximately \$93 million in the program.

Due to a budgetary shortfall in PY 2019, OVR reevaluated its OOS and determined that OVR's available and projected resources would not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted with the PaRC at their March 6, 2019 Full Council meeting and with the director of the Client Assistance Program on budgetary concerns, analysis, and the need to seek approval from RSA to close the OOS. This action would result in the establishment of a waiting list for the VR program for all priority categories. At the March 7, 2019 OVR State Board meeting, the Board voted unanimously to allow OVR to proceed with taking necessary steps to close the OOS for all categories.

On July 1, 2019, with approval from RSA, OVR closed priority categories Most Significant Disability, Significant Disability, and Non-Significant Disability. Since this change to the OOS, new customers determined eligible and assigned to a closed priority group are placed on a wait list. The OVR leadership team reviews the fiscal outlook on a quarterly basis to determine when customers could be removed from the list and how many could be removed pending the availability of funds. The OOS was subsequently opened on the following dates: February 1, 2020, May 1, 2020, August 1, 2020, December 3, 2020, January 4, 2021, April 5, 2021, May 10, 2021, May 24, 2021 and July 1, 2021. As of July 1, 2021 all eligible customers on the wait list were able to be removed from the list. OVR chooses to remain under an OOS option with the opportunity to continue to evaluate the fiscal outlook quarterly and resume the OOS and re-develop the wait list as fiscally found necessary. The decision to retain the OOS option is based on projections in description k. Annual Estimates, and the expectation that as our country experiences an economic recovery post-Covid, indicate that more individuals will once again be seeking employment opportunities and will likely seek vocational rehabilitation services through OVR.

The practice described below is expected to be used if the Order of Selection is closed and a wait list is put in place.

New customers determined eligible and assigned to a closed priority category will be placed on a waiting 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.

1. 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 waiting 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 with a Non-Significant Disability. Rationale for placement will appear in the customers case file.
2. Each customer placed on a waiting list will be notified in writing of the priority categories, his or her assignment to a particular priority category classification, and be informed to alert OVR regarding possible reclassifications due to a change in the individual's 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.
3. For eligible customers who do not have approved IPEs with an effective date prior to being placed on the list and are not in an open priority group:
 - 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.
 - No IPE will be written to provide such services to these individuals until such time their OOS category opens and they receive notification we can serve them.

Procedure for processing applications:

1. Upon receipt of referral, counselor meets with applicant to complete application and informs them about OOS and resources that can assist them while they are on the waiting 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 from 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 6 months).
4. CWDS will add the case to a waiting list in the system, not allowing services to proceed. Notice of such (as outlined above) will be sent to the customer.

Procedure for putting customers on the waiting list:

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

Procedure for taking customers off the waiting list:

1. OVR will determine when to open each category based upon financial availability and will 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. 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.
3. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the waiting list for the recently opened priority category.
4. 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.
5. The District Administrator will ensure customers are assigned to counselors.
6. Counselors will complete an IPE within 90 days from the date the client was taken off the waiting list.

C. THE SERVICE AND OUTCOME GOALS

OVR's outcome and service goals are projected as follows for PY 2021-2024:

1. For the Most Significant Disability category, the number eligible is expected to be 17,000, while the number served will be 46,000. The number rehabilitated will be 7,000 (from DLI Performance Plan), of which 100% will be rehabilitated into the competitive labor market.
2. For the Significant Disability category, the number accepted is expected to be 300 Significant Disability continue on the waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category II of the OOS.
3. For the Non-Significant Disability category, the number accepted is expected to be 9 Non-Significant Disability continue on a waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category III of the OOS.

Using both current and historical data, OVR projects that 300 individuals categorized as Significant Disability and 9 individuals categorized as Non-Significant Disability will be on the OOS wait list throughout PY 2024. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of the Significant Disability and Non-Significant Disability categories.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

The time frame in which goals are to be achieved is approximately 30 months for the Most Significant Disability priority of service category.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

In keeping with federal mandates, it is the policy of OVR to operate on an OOS when the agency is unable to provide services to all eligible individuals in the same state who apply for services. The OOS in Pennsylvania gives priority first to individuals categorized as Most Significant

Disability; secondly, to individuals categorized as Significant Disability; and third to individuals categorized as Non- Significant Disability. All new applicants for services must be notified about the OOS. With all categories closed, it would be expected that Most Significant Disability would be included in these Priority Category breakout on projections listed here for the remaining period of PY 2021.

The determination of the level of significance is made by the VRC based upon a review of data developed to make the eligibility determination, and to the extent necessary, an assessment of additional data.

Significance of disability is defined based upon the presence of functional capacities and the requirement of multiple VR services, defined as two or more services that are expected to last 6 months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

With all categories closed, a letter is sent to the individuals who will be placed on a waiting list for services indicating that they have been determined Most Significant Disability, Significant Disability or Non-Significant Disability. VRCs provide information and referral services regarding the most suitable services to assist the individual on the waiting list and this is documented within a case progress note or the waiting list letter sent to the individual.

OVR Executive Leadership team will evaluate the agency's available resources on a quarterly basis to serve all eligible individuals with disabilities. OVR will determine when to open each category based upon financial availability. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category. 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. If resources are available, the OVR District Offices will be informed that they can move individuals from waiting into an active status with OVR. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the deferred list for the recently opened priority category.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

Any applicant who has been determined eligible due to their disability, is in immediate risk of losing the job due to the 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 waiting 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 waiting list.
2. Immediate need 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.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

OVR provides SE services to eligible customers with the most significant disabilities who have been determined to require on-going support services to maintain employment. OVR has an on-going, over-arching goal of providing quality SE services which are delivered in an effective, efficient and timely manner. To that end, OVR initiated many changes/enhancements to the SE policy and procedures in 2018. The goals and priorities identified in this policy reflect an expansion of types of SE services to better meet the diverse needs of customers; a move to an entirely online system for more streamlined referral, reporting, billing and tracking of SE cases; and incentives to providers for working with unserved/underserved populations including rural, transition-aged, veterans, Social Security Administration (SSA) recipients and others. Since 2018, OVR has been providing technical assistance to OVR staff and CRPs to ensure smooth delivery of SE services rendered using the new policy and system. This assistance continues to support the provision of SE services to customers on a statewide level.

In addition, since the implementation of the new policy, over 160 CRPs have signed an SE Provider Agreement with OVR to render SE services to customers. New credentialing requirements issued in 2018 allowed CRP staff to better ensure OVR's goal of a consistent and quality customer experience for those receiving SE services. An emphasis on job stability as the driver of case success, as opposed to only meeting days of employment milestones, was another notable shift in OVR policy designed to meet the goal of improved, long-lasting placements.

It is OVR's intention to provide at least 50% of its Title VI fund award towards SE services for youth with disabilities each fiscal year. In the recent program year OVR devoted 100% of this fund towards youth with disabilities.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

A determination of the need for extended services for youth, up to age 25 with a disability, begins during the initial assessment phase of a case. At that time, the rehabilitation team comprised of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), LEA staff and others, determine possible long-term support needs and resources. As the case progresses, and the youth obtains employment, 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 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 after intensive job supports have been provided, 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 to youth using Federal VR dollars until the end of the 48th month the customer has been receiving supported employment services on the job. For cases with alternative funding, OVR must continue to follow-along for a minimum of 90 days after the case transitions to extended services prior to determining a successful closure outcome. For those individual's with ODP funding, OVR entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

OVR will seek opportunities to leverage other public and private funds to increase resources for extended services and expand SE opportunities for youth with the most significant disabilities. This will be done by exploring innovative partnerships and enhancing service coordination with agencies such as ODP, OMHSAS, OLTL and BJJS, as well as LEAs.

OVR has entered into a MOU with BJJS, in collaboration with PACTT affiliates, that leverages state and federal funding. These funds are targeted to provide a wide range of services such as the creation of summer programming, increased pre-employment transition services, and paid work experiences to promote career pathways in the underserved population of students/youth with the most significant disabilities who are involved with the juvenile justice system.

Funding for extended services is often available for customers eligible for Medical Assistance waiver programs administered through ODP and OLTL. Procedures are now in place for a youth's rehabilitation team consisting of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), LEA staff and others, to identify these resources at an early point in an OVR case. A joint bulletin between OVR and ODP now details when and how a case moves from OVR to ODP funding, including cases for youth with disabilities.

OVR has initiated an Employer Service Premium (ESP) for providers as an incentive to work with unserved/underserved populations including transition-age youth. Two of the 13 qualifiers for the ESP are the Age Premium Qualifier, which applies to OVR customers under the age of 25, and the Transition Premium Qualifier for customers who become employed within two years of graduation from secondary education.

O. STATE'S STRATEGIES

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

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

Goal #1: Increase Competitive Employment Opportunities for Individuals with Disabilities.

In June 2018, Pennsylvania adopted the Employment First Act, Act 2018-36, 62 P.S. § 3401 *et seq.*, to ensure that individuals with a disability be given the opportunity to achieve economic independence through jobs that pay competitive wages in community integrated settings. The statute also created the Governor's Cabinet for People with Disabilities and the Employment First Oversight Commission. The Governor's Cabinet for People with Disabilities will review existing regulations and policies to recommend changes to laws, regulations, policies, and procedures that ensure implementation of Employment First. OVR has a key role in this initiative and, through the sub-goals below, will participate fully to increase employment opportunities for Pennsylvanians with disabilities.

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.

In order to expand the availability of these services OVR must continue to strengthen and increase business partnerships. OVR will work to serve businesses through a Single Point of Contact (SPOC) approach, modeled after the CSAVR use of a National Points of Contact network. OVR staff within BSOD and local District Offices will continue to outreach to employers to increase opportunities for apprenticeships, internships, and OJTs for individuals with disabilities. Identified OVR staff will also participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania's workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

OVR's BSOD will be reviewing and establishing standard operating procedures (SOP) to ensure statewide consistency of OJTs, internships, large-scale hiring/referral efforts, and other related initiatives. SOP will also ensure that businesses engaging with OVR receive consistent and appropriate response to hiring needs. Along with the development of SOP BSOD will conduct regional and statewide trainings to support the field. One example of how a successful SOP for a large-scale hiring/referral effort increased OJT availability is through the recent InspiriTec hiring initiative in 2021 for its Customer Service Representative for Unemployment Compensation position. BSOD consulted with the business, crafted an SOP, and trained and mobilized SPOCs for all local offices—ultimately supporting the referral of over 600 customers with over 300 customers being hired *with* OJTs.

Identified OVR staff have been and will continue to partner with the Pennsylvania Apprenticeship & Training Office (ATO), Keystone Development Partnership (KDP), and others to learn how to cultivate, develop, and support apprenticeship opportunities. One example of this method is through the Registered Apprenticeship Navigator course provided through KDP where three BSOD specialists are physically participating in an apprenticeship geared towards the development of registered apprenticeships. Upon the potential success of this program OVR will assess potential continued enrollment of field staff in future cohorts.

Over the next two years, OVR intends to work collaboratively with DLI's ATO Office. An agreement between OVR and ATO to use matching funds to promote pre-apprenticeship and apprenticeship pathways for OVR customers will allow customers to achieve quality employment outcomes at high wages. This collaboration will include activities and services related to promoting opportunities, training OVR staff on how to facilitate customer access to pre-apprenticeships and apprenticeships, and forming connections with registered apprenticeship sponsors.

In addition, HGAC is consulting with the ATO and OVR BSOD to develop a pre-apprenticeship training program. A short-term, pre-apprenticeship training program will be designed to provide the necessary preparatory safety skills and certifications for individuals who are interested in entering registered apprenticeships. HGAC will provide the pre-apprenticeship training on site and registered employers will provide the technical training. Specific preparatory skills and certifications will be determined by participating employers, based on their industry's respective needs for skilled workers. OVR intends to explore an agreement between the Hiram G. Andrews Center and the Mon Valley Initiative to use matching VR grant funds to create pre-apprenticeship pathways to traditional apprenticeship in trades as well as non-traditional apprenticeships (e.g., IT; Healthcare/Medical; Manufacturing; Customer Service and Hospitality; Conservation, Renewable Energy & Natural Resources; Service Industries; Culinary and Food Service).

HGAC also offers internship/externship opportunities for credit within nine of the existing CTI programs, and additional externship opportunities with local businesses are in development.

2. Partner with the BWPO, local Workforce Development Boards (WDB), and individual CareerLink administration bodies to ensure programmatic and physical accessibility of the PA CareerLink centers for equal access for individuals with disabilities.

OVR District Administrators and some Assistant District Administrators in OVR's 21 District Offices participate in their local Workforce Development Board meetings regularly to further collaboration of efforts with the goal to lead to increased employment opportunities for Pennsylvanians with disabilities.

To promote programmatic accessibility, the BSOD has developed a comprehensive disability awareness and etiquette training that is delivered across the commonwealth to interested PA CareerLink partners and businesses. OVR has also made available to all Commonwealth employees an "Introduction to OVR" training to inform staff about the services OVR can offer to individuals with disabilities. OVR staff has received Leadership Training on the Americans with Disabilities Amendments Act to include strategies and modules for training businesses and customers on the Act.

To promote physical accessibility within the CareerLink sites across the commonwealth, trained OVR business services staff offer and conduct ADA accessibility assessments and offer recommendations based on the findings to the local WDB's and the CareerLink administration. OVR will also remain available to assist with providing guidance to CareerLinks undergoing a move or renovation.

3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

A monitoring procedure is being reviewed that will examine both internal and external factors of the SE program with the goal of improving the program and ultimately increasing outcomes. Internal monitoring will look at each OVR district office regarding utilization patterns of SE services: adherence to established procedures for referral; authorizations; report acceptance; invoice processing; and customer satisfaction and customer employment outcomes. Externally, OVR will monitor provider performance regarding timeliness of service provision and billing, adherence to established procedures throughout the process, customer and OVR satisfaction, and customer employment outcomes. Ongoing technical assistance and training will be offered by OVR staff to providers based on monitoring outcomes.

Changes to OVR's SE policy implemented in 2018 intended to increase/improve SE outcomes include: requiring provider staff to be credentialed; increasing the communication between OVR and provider staff working with a customer; offering a wider range of services to meet customer needs; and inclusion of extended supports. Although the intentions of the current policy remain a goal of OVR, implementation has been challenging for providers and staff due to the complex system rules, inflexibility of service progression/timelines, and period of performance difficulties surrounding the processing of SE service authorizations. OVR is in the process of revising the current SE policy to account for these challenges through the use of an SE Workgroup and continued collaboration with CRPs.

Goal #2: Improve Transition Services for Students with Disabilities.

OVR staff will remain at the forefront working with PDE personnel to increase pre-employment transition service opportunities for students with disabilities, as well as increasing opportunities for the development of workplace skills and community integrated work experiences.

1. Update the Pre-Employment Transition Services program, including the case management system, so that it provides services to students with disabilities in an efficient, documented, and cost-effective manner that aligns with federal regulations.
2. Develop internal controls that ensure services are provided to students based on an assessment of need.
3. Develop and utilize a continuum of services based on evidence-based practices to demonstrate student progress.
4. Develop monitoring and program evaluation procedures to identify best practices that can be replicated throughout the state.
5. Add services to increase opportunities for students to gain workplace skills and community integrated work experiences.
6. Enhance collaborative relationships with DHS, PDE and higher education institutions by:
 - a. ensuring that each secondary school in Pennsylvania has a point of contact;
 - b. participating in the Statewide Leadership Team;
 - c. collaborating in the development of the Pennsylvania Community on Transition Conference each year; and
 - d. participating in cross-training and attending partner conferences.

Goal #3: Increase Community Education and Outreach.

1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.

The customer satisfaction survey information is an important way for OVR to understand the needs of the community and to outreach to customers. OVR will continue to work closely with PaRC on developing ideas and plans to increase customer satisfaction. OVR provides PaRC with a monthly summary of the results from the customer satisfaction surveys. In addition, OVR staff participate in PaRC Customer Satisfaction Committee conference calls on a quarterly basis to discuss the results of these summaries. There have been some technical changes made in CWDS in an attempt to increase customer participation in this process, with minimal improvement. OVR is dedicated to working with PaRC to find additional creative ways to improve customer participation in the survey process.

2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.

During 2018-2019, OVR conducted research on diversity and inclusion needs of unserved and underserved populations through a contract with the Pennsylvania State University Research Team. The research included three different phases: focus groups with representation from all 21 OVR District Offices; staff surveys; and key informant interviews of individuals who have a special knowledge or perspective on OVR and performance as it relates to diversity and inclusion. The outcome of this research, and associated benchmarks, will be used to guide OVR in the development of in-service training for staff, as well as future programmatic adaptations to stretch OVR's reach to those identified as unserved or underserved in Pennsylvania. OVR is in the process to create a diversity and inclusion task force to develop a plan for continual

implementation and monitoring of diversity and inclusion integration across the commonwealth. OVR has also developed a variety of focus groups to explore issues related to diversity, equality, and inclusion for marginalized groups of individuals within its employment. OVR's goals during this next two-year plan will be to complete staff training in diversity and inclusion, and to develop a task force for continued implementation of a diversity and inclusion focus.

3. Promote accessibility and technology based upon universal design principles.

An important part of the rehabilitation process is evaluating the accessibility and technology needs of OVR customers. This takes place during the initial intake interview, continues throughout the life of the case, and is most important at the time when the individualized plan for employment is developed. Each customer has individualized needs and although not everyone will require assistive technology, this is an important practice. OVR has an AT Specialist onboard to assist staff with maximizing the use of AT and provide information about how AT can assist OVR customers to achieve their educational and employment goals. This specialist also supports OVR staff who have accessibility needs on-the-job when the organization is transitioning to new software or hardware devices.

OVR staff also supports community outreach by issuing grants for ATLL, the assistive technology lending library facilitated through the Institute on Disabilities at Temple University, as well as to the Pennsylvania Assistive Technology Foundation (PATF) which offers individuals with disabilities alternative financing to purchase assistive technology, and home and vehicle modifications. These programs offer important services to the disability community that might otherwise go unmet in terms of accessibility and assistive technology.

Another way that OVR engages in community outreach and supporting universal design principles is by offering to conduct ADA accessibility assessments at CareerLink locations. This service is offered through the BSOD team upon request.

In addition, OVR collaborates with the DLI's BWPO via PA CareerLink offices to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment. OVR staff attends Pennsylvania Cares meetings to learn about AT and training programs offered by various community and state agencies and higher education institutions. OVR staff then disseminate this information statewide to OVR Veteran Coordinators and Veteran Counselors who provide AT equipment and training to OVR customers who are veterans with disabilities.

Finally, the OVR Training Division is also committed to accessibility by ensuring that all training materials for OVR staff or external participants are available in accessible format before being released. In addition, the OVR Training Director schedules a Communication Access Realtime Translation (CART) service for each staff webinar or video conference training. CART service is also provided for any OVR scheduled public meeting, in addition to sign language interpreter services being available at every OVR district office.

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

In order to offer state-of-the-art educational training and rehabilitative services, the Hiram G. Andrews Center must continue to repair, replace, enhance and expand services, technologies and physical plant offerings to attract and retain students and offer the highest quality education and rehabilitation services.

There are specific projects the Hiram G. Andrews Center anticipates initiating and completing within the scope of this plan. The specific projects planned are an upgrade to the existing building automation system, upgrade and replacement of security cameras throughout campus, upgrade to existing, end-of-life phone system, remodel and upgrade to all existing public restrooms within the Hiram G. Andrews Center, repairs to the facility roof, replacement of end-of-life air handlers and cooling towers, repair to a failing ADA ramp/egress which is pulling away from the facility, window replacement within the facility kitchen and Dining Hall, repair to existing sidewalks to include repair and addition of curb-cuts and an upgrade to the end-of-life wi-fi access points, with an upgrade to the staff network.

Plans related to growth of the Hiram G. Andrews Center, and the expansion to serve more customers in existing programs, and the establishment of short-term, high impact programming makes the capital improvements necessary to ensure viability and continued growth and impact into the future.

The Hiram G. Andrews Center Executive Team annually establishes projects that are required to be completed within the physical plant. All recommended projects are vetted through the OVR Executive Team before any initiation. Prior approval will be sought when appropriate and necessary.

HGAC will be phasing the renovation of our seven dormitories over multiple years, renovating half-dormitories at a time to modernize and revamp our student living areas. This renovation is long overdue, with original fixtures, desks and cabinets still being used by current students."

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

In accordance with OVR's policies, OVR purchases AT devices and services to support its customers in their vocational goals. OVR also provides information and referral services regarding other resources when the agency is unable to provide funding for AT devices and services. OVR's Statewide AT Coordinator regularly distributes information electronically to OVR's District Offices regarding non-VR funded AT services, programs, and resources.

The VR customer will be provided AT services and devices throughout the rehabilitation process. An assessment will always precede the issuance and use of any AT device or service to ensure provision of such items is appropriate and necessary to meet the vocational needs of the individual.

OVR works with vendors who are Rehabilitation Engineers and AT Specialists on a "fee-for-service" basis throughout the commonwealth. Most providers, including staff from HGAC's Center for Assistive and Rehabilitative Technology, can travel to the OVR customer's home and/or worksite to provide AT evaluation and training services.

OVR also has specific AT policies including a Home Modification Policy, Vehicle Modification Policy and the Farming and Agriculture Rehabilitation Management policy. These policies provide a wide range of AT evaluation and services detailed to meet the needs of OVR customers in removing environmental barriers to employment.

The Center for Assistive and Rehabilitative Technology at the HGAC in Johnstown, Pennsylvania is an available AT resource to OVR customers throughout the commonwealth. Referrals to this program are made as a service provided through the Individualized Plan for Employment (IEP) process. In particular, CART services may be of assistance for customers that are current high school seniors preparing for college, but is available to any individual with a disability. Highly

trained professionals evaluate and support people in the following areas of assistive technology: positioning and mobility; computer access; augmentative communication; environmental controls; driver evaluation; vehicle modification; devices for activities of daily living; devices for visual and/or auditory impairment; and home and work modifications. The Learning Technology Program assesses student's needs in the classroom and trains them in the use of assistive technology, if necessary.

OVR collaborates with Pennsylvania's Initiative on Assistive Technology (PIAT) at the Institute on Disabilities at Temple University to participate in training, to support the Pennsylvania Assistive Technology Lending Library, and to develop AT resources for Pennsylvanians with disabilities. PIAT's Lending Library provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post—secondary education, or similar purposes). The centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location as part of the ATLL program. The regional subcontractors of PIAT facilitate the selection, borrowing, and use of these devices across the state.

OVR customers are also informed about low interest loans that are available through the Pennsylvania Assistive Technology Foundation for customers who have a disability or any older or state resident who has need for AT.

OVR also collaborates with BWPO via the PA CareerLink sites to better assist veterans who have disabilities obtain AT to remove barriers in locating and maintaining employment. The Statewide Veterans Coordinator attends Pennsylvania Cares meetings monthly to learn about assistive technology/training programs offered by various community and state agencies and higher education institutions. This information is transmitted statewide to OVR Veteran Coordinators and Veteran Counselors in each field office who provide AT equipment and training to OVR customers who are veterans with disabilities.

OVR has additionally collaborated with Penn State's AgrAbility Program and the Department of Agriculture in developing a policy to address the rehabilitation needs of farmers/ranchers with disabilities. This policy is known as Farming and Agriculture Rehabilitation Management which is designed to assist farmers with disabilities. VRCs, with technical assistance and guidance from Pennsylvania's AgrAbility Program, are able to assess the rehabilitation needs of farmers/ranchers with disabilities to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.

Finally, OVR will explore an agreement with the Office of Administration's Human Resources Office for the development of a Career Transition Professional (CTP). The CTP may serve as the Commonwealth of PA Employer Single Point of Contact (SPOC) in the recruitment, retention, and onboarding of all individuals with disabilities that meet the employer identified requirements for employment.

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

OVR has referenced information found in the 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 within their community. OVR strives to provide employees and customers with materials, resources, and

services in languages other than English. Depending on the cultural and ethnic composition of a community, some OVR offices employ bi-lingual vocational counselors to increase outreach to unserved or underserved populations. This may include arrangements by an OVR counselor to use a liaison site to work in the community as a means to offer greater access to services. District Office staff also regularly look for opportunities in their community to promote OVR services through participation in “Back to School” nights, job fairs, and community events.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

OVR will collaborate with LEAs to assist youth in the attainment of competitive, integrated employment by increasing paid work experience opportunities and other career exposure experiences, such as job shadowing, mentoring, and employer mock interviews, in addition to SE services.

OVR has experienced significant growth and interest in customer participation in its Summer Academy programs. What started as an extended “freshman orientation” to college campus life for students with disabilities has evolved into numerous highly specialized, short-term programs for students and youth. The popularity of these programs has led OVR to the point where these programs need to be restructured, to allow specialized service vendors to share with OVR and its customers their specialized programs and curricula to meet OVR customer individual needs in the most community integrated and least restrictive settings as possible.

Beginning with the 2019-2020 school year, OVR implemented a workflow to ensure the delivery of pre-employment transition services to schools without supplanting services already occurring in the classroom. OVR staff meet with school districts to assess their resources and the needs of their students. Once it is determined what services are needed by the school, OVR will first work with their district office staff to provide those pre-employment transition services. If we do not have the staff available, OVR will seek a provider to complete the service.

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

OVR has also been working to improve CRPs through the monitoring of contracts and grants. The monitoring of VR programs awarded through I&E contracts and/or AMs or provider agreements are routinely monitored by OVR using a standardized process and standardized tool. This process is outlined in the VR Services Manual. Both the vendor, as well as the local District Office, are afforded the opportunity to provide input regarding issues that have an impact on projected customer outcomes. This monitoring information is used by OVR to establish, develop, improve, and realign community vocational rehabilitation services, and has been used to help with problem situations. This input is also of fundamental importance when OVR reviews and considers programmatic existing service contract renewals, amendments, and new service bids especially at the time of service and/or customer case review.

In addition, an SE Provider Agreement will continue to streamline the approval and onboarding of new SE (including Customized Employment) providers. Regular technical assistance and training calls, an SE provider email list, and SE resource accounts for technical and policy questions have been established and will be utilized for communication with and to support community rehabilitation programs. In recognition of the challenges identified by CRPs related to the current SE policy (implemented in 2018), OVR will continue the process of revising the SE

policy to mitigate complex system rules, inflexibility of service progression/timelines, and period of performance difficulties surrounding the processing of SE service authorizations. Upon the adoption and implementation of a revised policy, efforts will then be made to develop a standard monitoring tool and procedure with a timeline so that all of OVR's SE providers can benefit from direct feedback and technical support.

Starting in 2017, OVR, in collaboration with ODP, investigated and put into place the Certified Employment Support Professional (CESP™) ACRE, a credentialing process that recognizes individuals who have demonstrated a sufficient level of knowledge and skill to provide integrated employment services to a variety of populations. Specifically, ACRE certification endorses competency-based training in 2 areas:

1. Employment Services (basic and professional levels); and
2. Employment Services with an Emphasis on Customized Employment (basic and professional levels).

OVR has been engaging CRPs for benefit counseling by using a Benefits Counseling Provider Agreement to set rates and services, which allows OVR staff to authorize CRPs to provide this service directly to customers. Benefits counseling services are provided by CRPs across Pennsylvania and are considered an integral component in the development of employment goals. Individuals with disabilities seeking services through Pennsylvania OVR who receive Supplemental Security Income or Social Security Disability Insurance require skilled personnel to assist in the decision-making process. Certified benefits planners are sought to assist customers in identifying the potential impact of employment in the pursuit of independence. Having this type of support and individualized information can help individuals pursue their career goals with a better understanding and less worry about their benefits. These certified benefits planners are employed by CRPs. Information was disseminated to OVR field staff and CRPs through webinar trainings, in an effort to establish these services in more CRPs across Pennsylvania. Currently, three community rehabilitation programs have been approved and one community rehabilitation program is awaiting approval. Field staff are additionally encouraged to enroll new CRPs and to encourage customer engagement in the process.

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

OVR has implemented a variety of measures to assist with the employment rate, measurable skills gains, and credential attainment of people with disabilities as indicated in Section 116 of WIOA.

1. OVR has implemented a comprehensive revision of its SE and Customized Employment programs in 2018 which offers additional assistance, services, and short and long term follow up services to ensure that customers are placed appropriately and are able to maintain their employment. Due to the identified challenges listed earlier in this plan OVR will continue to revise the policy through the use of an SE Workgroup and regular CRP engagement.
2. OVR has required that SE and Customized Employment vendors have minimum standard credentials to provide these services to ensure better quality outcomes for our customers.
3. OVR has developed a comprehensive measurable skills gain training and documentation process within CWDS.

4. OVR routinely invests significant resources in training activities across the commonwealth to ensure that customers are able to become employed in their chosen career field.
5. OVR has partnered with the Office of Administration in offering a Commonwealth Internship program for our students in the Harrisburg area to work in a variety of Commonwealth agencies related to their degree.
6. OVR has partnered with CIL partners to offer internship opportunities at a variety of CIL locations across the state.
7. OVR has partnered with a variety of institutions of higher learning to offer supported education programs for customers on the autism spectrum to ensure that they are able to successfully complete their college degrees and obtain community integrated employment post-graduation.
8. OVR continues to offer several summer activities that allow our customers to utilize AT and be better prepared for college life and expectations which enables them to obtain credentials and lead to community integrated employment post-graduation.
9. OVR is partnering with ODP to share data to better track shared services and utilize long term supports to ensure mutual customers that become employed have the supports necessary to stay employed long term.
10. OVR has also introduced a variety of customer satisfaction surveys related to transition, SE, status 26 and status 28 closures to learn from our customers what services or supports were most impactful.

OVR has also implemented a comprehensive business services approach to serving the business community.

1. OVR's statewide business service team serves as a Single Point of Contact (SPOC) for staff and businesses. In this role as a SPOC, business service staff offer training and technical assistance on business engagement, ADA consultation, placement trends, and activities. A SPOC also interfaces with business and industry to provide support and develop programs and partnership locations.
2. OVR will continue to implement local business SPOCs for businesses for ADA and reasonable accommodation consultations, the placement of customers, etc.
3. OVR will continue to create and foster multiple partnerships with businesses that lead to placements and long-term opportunities for training and measurable skill development, or credential attainment for OVR customers.
4. OVR will develop standard operating procedures related to key business service offerings (i.e. OJTs, large-scale hiring efforts, internships, etc.) along with staff training and support to improve consistency and quality of services to customers and businesses.
5. OVR is working on an update to CWDS to track business engagement activities referred to as "indicator" #6 in WIOA Title I-IV. These business engagement activities measure common program effectiveness in serving employers and are currently being developed by DLI Workforce System partners that include: OVR, PA CareerLink sites, the Statewide Workforce Development Board, CWIA, and Title II Adult Education Programs.

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

WIOA has mandated that six federally funded programs work together to improve alignment, coordination, cooperation and collaboration in services to businesses. Programs included in this alignment include: 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 Pennsylvania as PA CareerLink), and Title IV, the public VR program as defined by the Rehabilitation Act of 1973, *as amended*. This has led to a greater emphasis on student/youth career pathways, competitive integrated employment for persons with disabilities, and increased business engagement.

OVR will partner with PA CareerLink staff, Pennsylvania economic development partners, community rehabilitation providers (CRPs), DHS ODP, OMHSAS, OLTL and other DLI BWPO multi-employer workforce partnerships in an effort to increase employment opportunities for OVR customers. When an employer works with the PA CareerLink or a CRP for example, it is because they have a need for qualified talent. By coordinating with these agencies the available talent for referral to businesses expand with the addition of potential OVR customers, meeting the needs of both the job seekers and the employers.

OVR BSOD staff and District Office business services teams will review regional workforce trends to focus on in-demand employment sectors expected to grow in the next five years to aid in the following:

1. Provide a high level of business engagement with targeted employers to increase awareness of OVR services and to develop OJTs, work-based learning experiences, etc.
2. Share Labor Market Information (LMI) published monthly from DLI's CWIA between business services staff and local district office VRC's to promote career-based IPEs likely to lead to successful employment and skill training to prepare for expansion or 'super' sector jobs in each region of Pennsylvania.

In response to an organization's demand side workforce talent needs, OVR can offer a recruitment process to bring qualified pre-screened individuals with a disability into their organization. OVR will work with each business to target career ladders and pathways for quality competitive integrated employment in career pathways matched to a VR customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer. OVR will simplify the process by using a SPOC approach modeled after CSAVR's use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions.

BSOD specialists or combined bureau staff will provide no-cost consultation to employers on disability etiquette, accessibility, accommodation needs and referral assistance to help retain an employer's workforce following an injury or the onset of a disability upon request. Some OVR business service staff are trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University, on the use of the Misericordia University Comprehensive Accessibility Kit, and the Americans with Disability Act Architectural Guidelines standards, and can provide non-legal, best practice disability etiquette training and on-site accessibility compliance reviews to employers and State agencies, upon request.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

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

The 2015-2018 CSNA Report, jointly conducted by the Institute on Disabilities at Temple University, along with OVR, and PaRC, was used to develop the goals and priorities for this plan, along with the strategies that will contribute to the achievement of the goals for the 2020-2024 Pennsylvania WIOA Combined State Plan. A steering committee, including seven OVR employees and nine members of PaRC, met to discuss the requirements of the CSNA, and to develop the Statement of Work to guide the focus of the CSNA. An essential factor of this CSNA plan was to encompass the overall rehabilitation needs of people with disabilities throughout Pennsylvania, including those individuals served by other parts of the statewide workforce investment system. The goals and strategies described above align with goals and strategies recommended from the CSNA.

The continued focus on improving transition services for students with disabilities in this plan is consistent with a goal recommended from the CSNA, that OVR work to develop more holistic and equitable relationships and communication with school districts across the commonwealth. OVR transition staff, including Early Reach Coordinators will continue to participate in activities in local school districts, work with students, and attend transition planning meetings.

OVR's goal to invest in a Diversity and Inclusion project is also supported in recommendations from the CSNA. OVR will use the research from the recently completed Diversity and Inclusion project with Penn State University to develop training for OVR staff beginning in 2020 directed toward: defining the concept of diversity and inclusion; understanding barriers for underrepresented/underserved populations; an outline of the value and importance of diversity and inclusion; providing substantial resources and strategies for our staff in providing services to the communities we serve. In addition, to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities, OVR will increase training in culturally competent strategies for serving these communities. OVR will continue to strive to provide more staff, materials, resources and services in languages other than English that may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities as well as refugee communities.

Customer Satisfaction continues to be an important topic from the CSNA and as described above in a renewed goal to continue work with PaRC to evaluate and improve on customer satisfaction surveys. OVR, in coordination with PaRC, will continue to evaluate ways the customer satisfaction surveys can be used to identify trends and patterns for service provision, will share this information with PaRC during customer satisfaction committee calls, and will work together to make improvements to the surveys and improve customer response rates.

Finally, the strategies planned through OVR's Business Services and HGAC to increase competitive integrated employment opportunities aligns with goals and priorities in the CSNA and the Employment First Act, Act 2018-36. OVR's BSOD will continue to develop innovative partnerships with eligible educational and workforce providers beyond what is already established.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

OVR has engaged in the provision of innovative and expansion activities through distinct I & E projects designed to address the pre-employment and transition needs of students with the most significant disabilities. Expiring I & E projects have demonstrated the ability to achieve established goals and improve employment opportunities for students engaged in each program. Current I&Es are scheduled to expire September 30, 2021 and September 30, 2022.

These programs are engaging with local district offices to continue services using provider agreements allowing for increased student engagement.

I & E project engagement has increased student engagement in the workforce through exploration of post-secondary opportunities, participation in work readiness services and supports, while engaging in employment opportunities in the community.

New I & E projects are being developed through the MOU with the Pennsylvania Department of Education to increase engagement of students with the most significant disabilities. The MOU is being amended to include the support of a Transition Employment & Agency Mentor – Navigators (Team Navigator) within each Intermediate Unit (IU). OVR, subject to availability of funds, will jointly provide funding over four (4) years to be used exclusively for the operation and administration of technical assistance.

In addition, OVR will explore agreements with 10 local Workforce Development Regions within the Commonwealth's Workforce Development Program to pilot a jointly funded Disability Employment Initiative that will allow the creation of disability navigators to work closely with OVR Vocational Rehabilitation Counselors to serve students, youth, and adults with disabilities.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

Transportation rose as the most significant barrier to service provision and employment in the CSNA for both OVR customers and OVR staff. Many OVR customers live in rural counties with limited transportation options and these rural counties present similar difficulty for OVR staff who may have to travel two to three hours to visit a customer. OVR collaborates with employers to adjust work schedules and local transportation authorities to adjust and/or expand service routes that better enable OVR customers to get to work. OVR staff are encouraged to schedule multiple customer visits when traveling to rural counties.

A second closely related barrier is the availability and use of technology in rural areas. Not all OVR customer base have computers or use of internet service. In addition, some customers are reluctant to use texting or e-mail to communicate with OVR. Some VR staff reported that many rural customers still rely on paper mail as their primary form of communication. This is problematic in rural areas where the postal system has stopped daily delivery of mail. Additional staff training on creative forms of communication and more clearly defined expectations in OVR policies related to communication is being considered.

OVR will explore an agreement with the Commonwealth's Office of Administration to develop accessibility testing through use of Information Technology Accommodation Personnel throughout all OVR combined District Offices. Accessibility testing verifies that digital content and services are usable by people with disabilities. Information Technology Accommodation Personnel will also coach, mentor, and train others who are learning to do accessibility testing.

A third barrier identified is related to counselor caseload size. While the average caseload size within OVR is 120 customers, some counselors have caseloads of 200 to 250 customers. With the closing of the OOS, we are recognizing the challenges staff are facing with increasingly complex case-management. Staff training is being planned to begin to address some of these challenges and offer improved case-management strategies.

A final barrier identified in the CSNA is related to inconsistent practice among OVR District Offices in the implementation of service provision to customers. Future staff training is again an avenue to improve the delivery of equitable and consistent services throughout Pennsylvania.

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

Describe:

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

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

VR Goal 1: Employment Opportunities for Individuals with Disabilities.

There are 3 parts to Goal 1:

1. Expand the availability of apprenticeships, internships, and OJTs for individuals with disabilities.
 - a. **Apprenticeship achievement:**
 - i. During PY 2020 three BSOD Specialists began a 1-year Registered Apprenticeship Navigator course provided through KDP where they are physically participating in an apprenticeship geared towards the development of registered apprenticeships. The knowledge gathered from this course will be used to assist OVR in employing new strategies to developing future apprenticeship opportunities.
 - ii. During PY 2020 OVR continued to partner with DLI's Apprenticeship & Training Office to increase apprenticeship opportunities however due to staffing challenges and the remaining effects of COVID-19 mitigation results of increased apprenticeships have yet to be assessed.
 - iii. OVR's Business Services and Outreach Division staff continued to support the Commonwealth Technical Institute/HGAC to explore eligibility of current certification programs and certificate skill trainings to become registered Apprenticeships or Pre-Apprenticeships.
 - b. **Internship achievement:** In PY 2020, 13 OVR customers participated in OJT-backed internship experiences. Of those, 5 were identified as youth and 6 identified as students.
 - c. **On-the-Job Training achievement:** In program year 2020, approximately 1,721 customers participated in OJT wage reimbursement employment opportunities that resulted in either:
 - i. 92 individuals completed an OJT as a work experience and job reference. This has included temporary, summer, and seasonal time-limited employment in retail establishments, amusement parks, health care, municipal maintenance, customer service, and clerical positions.
 - ii. 75 individuals completed an OJT in support of a permanent job.
 - iii. InspiriTec CSR for UC Initiative: OVR partnered with InspiriTec, an AbilityOne contractor, to refer at least 440 customers for a temporary job as Customer Service Representatives for PA Unemployment Compensation. As of 6/30/2021, OVR staff:
 - a. Referred 670 customers for the position where approximately 455 successfully applied
 - b. Supported the hiring of 308 customers (most of which had OJTs)

The numbers above do not reflect actual paid services as the OJT's spanned across PY 2020 and PY 2021

- d. **Strategies related to the achievement of part 1 of Goal 1:**
 - i. Marketing OJT value to businesses and for those not interested in wage reimbursement, OVR offered other services such as supported employment, customized employment, ADA consultation, etc.
 - ii. Not applying Financial Needs Test (FNT) to the provision of OJT affords all customers the benefit of OJT wage reimbursement services to an employer regardless of their financial status.
 - iii. Marketing the value of internships to both employers and customers through statewide, regional, and local means using the SPOC model and business service connections.
 - iv. Beginning the process of establishing SOP for statewide hiring initiatives to serve the needs of both our employers and our customers as referenced in the InspiriTec example above.
 - v. The COVID-19 pandemic likely impacted these internship numbers during PY 2020 so strategies for promoting employment included education on health and safety measures to customers, employers, and service providers.
- 2. Partner with the BWPO and individual CareerLink administration bodies to ensure programmatic and physical accessibility of the PA CareerLink centers for equal access for individuals with disabilities.
 - a. A strategy related to achieving this goal in PY 2020 consisted of the virtual participation of OVR staff in Workforce Development Board meetings both at a statewide and local level.
 - b. As a result of the COVID-19 pandemic OVR has been able to assist with providing consultation on the accessibility of the PA CareerLink/CWDS website.
 - c. BSOD staff continue to promote programmatic accessibility, through delivery of a comprehensive disability awareness and etiquette training to interested PA CareerLink partners and businesses.
 - d. OVR has also made available to all Commonwealth employees an "Introduction to OVR" training to inform staff about the services OVR can offer to individuals with disabilities. OVR staff has received Leadership Training on the Americans with Disabilities Amendments Act to include strategies and modules for training businesses and customers on the Act.
 - e. As a result of the COVID-19 pandemic and the PA Governor's order to telework, OVR staff have been unable to offer and conduct ADA accessibility assessments within the CareerLink sites across the commonwealth during PY 2020.
- 3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.
 - a. Successful achievement of this goal did not occur in PY 2020. A decrease in SE and CE outcomes is evident in the comparison of PY 2019 and PY 2020 data. As later referenced in B of Section P1, this reduction is likely the result of a closed Order of Selection, reduced customer interest in working during a pandemic, reduced employer demand while many businesses were shut down in PA during PY 2020, and reduced CRP availability due to staffing shortages. Despite the

decrease in outcomes, OVR utilized the following strategies to foster an increase in SE and CE outcomes during PY 2020:

- i. Continuing monthly technical assistance calls with CRPs
 - ii. Adding the provision of virtual SE services (when appropriate) during the COVID-19 pandemic
 - iii. Increasing SE and CE rates to mitigate the economic impacts related to COVID-19 and to help boost CRP availability
- b. OVR continued to evaluate and monitor implementation of the SE policy through the use of statewide reports and qualitative feedback received from OVR staff and CRPs during regular technical assistance calls. Specialists provided on-going assistance on an individual basis and continued to note the strengths and weaknesses of the current policy. The challenges of the current SE policy as referenced earlier in this Plan started to be addressed through policy revision activities including a statewide SE Workgroup and continued collaboration with CRPs.

Goal 2: Increase/Improve Transition Services for Students with Disabilities

A. Increase pre-employment transition services for students with disabilities.

1. OVR continues to approach pre-employment transition services implementation through three avenues: staff, fee-for-service agreements, and contracts. The WIOA amendments to the Rehabilitation Act require that a minimum of 15% of VR Funds must be used for pre-employment transition services. As a result, OVR transition staff are increasing the amount of time spent providing direct services to the pre-EST participants through school and group settings. Pre-employment transition funds for the PY 2019-2020 are estimated to be \$20 million. In the previous PY, OVR spent more than 15% of its VR funds on pre-employment transition services. OVR has increased pre-employment transition services for students by expanding the number of summer programs since the previous State plan. In addition to the Summer Academies for Visual Impairment, Deaf and Hard of Hearing, and the AACHIEVE Program that is a collaboration with BSE, most of the local district offices offer summer programs for post-secondary training or work experiences. OVR has developed Pre-Employment Transition Services Provider Agreements so that OVR can utilize over 150 providers to ensure as many students as possible are being served, in addition to the services being provided by OVR staff.

2. Increase opportunities for students to gain workplace skills and community-integrated work experiences. OVR works to increase customer outcomes (26 closures and work-based learning experiences) through: increased engagement with multiple employers; use of permanent and non-permanent OJT's; increased awareness of internships, both paid and nonpaid, and apprenticeships; and involvement with Work Partners at Career and Technology Centers

B. Enhance collaborative relationships with DHS, PDE, and higher education institutions.

Experience the Employment Connection – OVR partnered with DHS, ODP, OMHSAS, and PDE in 2019 to develop and offer employees an interagency training opportunity known as Experience the Employment Connection (EEC): Possibilities in Action. This collaborative effort was driven by the Governor's Executive Order on Employment First. EEC's goal is to increase competitive, integrated employment for Pennsylvanians with disabilities, including students with disabilities, by connecting professionals across these systems. Participants learned about staff roles, policies, procedures, funding requirements, and emerging practices related to improving services to adults and high school students. Close to 4,000 interagency professional

staff have participated in these training sessions aimed at identifying needs, improving services and competitive employment opportunities for adults and students with disabilities. This interagency program experienced a brief hiatus in 2020 and 2021 due to COVID-19 restrictions. Efforts are again under way between all of the partner agencies to develop a new and revised interagency training to continue to enhance collaborative relationships.

C. Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.

The Overbrook Summer Transition Institute served a total of 21 students in 2018 and 2019. This program provided opportunities for students who are blind or visually impaired to engage in paid work experiences not otherwise available to them. The Institute ran for three weeks using braided funding with BBVS and Overbrook funds covering the program costs in 2019. Students participated in various career exploration and work experience activities including a 4-day internship. The students worked at the following 5 locations: Lighthouse Café, Farm to Table Development Office, Couch Tomato Café, Cold Stone Creamery and Weston School. Each student earned \$164.00 for 16 hours of work experiences.

The Overbrook Summer Transition Institute was placed on a temporary hold in 2020 and 2021 due to the social challenges and potential risk associated with the Covid-19 virus. OVR hopes to re-initiate this program in future years if and when the risk is diminished.

D. Research best practices for the implementation of peer mentoring opportunities.

As of September 1, 2019, the Pennsylvania Certification Board is overseeing the certification process for Certified Peer Support Specialists. Peer Support Training was provided to 137 individuals who were 18 years old & over during the period of July 1, 2017 through June 30, 2019. OVR is working with OMHSAS to identify formal pathways within which to develop training and implementation of Peer Supports within Pennsylvania.

Goal 3: Increase Community Education and Outreach

A. Work with PaRC to share best practices and outreach methods to increase participation in the Citizens Advisory Committee meetings.

OVR District Office Administrators continue to be involved in supporting the organization and planning for local Citizen Advisory Committee meetings. OVR Central Office representatives participate regularly on the PaRC Citizen Advisory Committee conference calls and follow-up as needed with local planning.

B. Continue to grow OVR's social media presence. In collaboration with DLI's Press and Digital Teams, OVR's Communication Liaison Team works to share relevant updates, resources and successes via OVR's Facebook, Twitter, Instagram and LinkedIn accounts. As of August 2021, OVR has 9,314 followers across all social media channels referenced below. From July 1, 2020, to June 30, 2021, OVR posts reached 123,427 individuals. OVR's social media accounts are as follows – Facebook: @PAVocRehab; Twitter: @PA OVR; LinkedIn: PA OVR; and Instagram: @PA OVR.

C. Educate staff on accessibility and technology based upon universal design principles.

Within OVR, we continue to promote accessibility by reviewing forms and presentation materials, revising as needed. We've also advocated for, and achieved revisions to, Human Resource forms (e.g., the request for accommodations), continuing to do so as issues are identified. In October 2018, all OVR staff were invited to attend a virtual training session titled

“Designing Accessible Presentations: An Ethical Obligation.” To extend information beyond just OVR, OVR staff met with the Commonwealth’s Web-Based Training (WBT) team in March 2019 to educate and advocate for accessibility of mandatory Commonwealth trainings. Revisions and collaboration have been ongoing, enhancing the accessibility of WBT training products. In May 2019, OVR extended information beyond Commonwealth staff by offering a similar training to all scheduled presenters for the 2019 Community on Transition Conference to enhance conference accessibility. OVR is an active participant in accessibility-based reviews of current and upcoming Commonwealth WBTs. Since 2017, OVR has, and will continue to, offer web accessibility consultation to the Governor’s Office regarding the development of pa.gov and governor.pa.gov sites and content. In 2019, OVR provided accessibility specific reviews of the employment.pa.gov site that hosts employment opportunities for Pennsylvanians. OVR continues to support the ongoing development of CWDS by working with developers to remediate existing accessibility failures and provide feedback regarding future developments. OVR continues to support staff who use assistive technology by offering in-house or contracted training opportunities to increase staff proficiency. OVR has also developed a partnership with the Bureau of Administrative Services and the Office of Information Technology to remediate in a timely manner DLI forms identified as inaccessible. Raising awareness of document accessibility is an ongoing need that can be addressed one document, one website, one person at a time. The OVR teams actively seize opportunities to enhance accessibility as they arise.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Unique challenges appeared between 2019 and 2021 which included the closing of OVR’s Order of Selection and the COVID-19 pandemic. The closure of OVR’s Order of Selection reduced the number of customers being served by the agency, thus reducing the number of customers receiving the SE services. A short time after the closing of the order, COVID-19 impacted service delivery. OVR staff were restricted to telework status, service provider availability was limited, customers were reluctant to participate in on-site work activities/services, and many employers were shut down and/or reduced operation. The combined effects impeded the achievement of projected goals.

With the low unemployment rate over the past few years, there have been many entry level, lower wage jobs available. However, Supplemental Security Income/Social Security Disability Insurance recipients are reluctant to give up their benefits for a job that will not replace the income and benefits they are currently receiving.

Transportation remains a difficult issue for many job candidates. Since many customers do not have a driver’s license or do not own a vehicle, they are dependent upon family and friends, public transportation or other special transportation services to get to and from work. OVR is collaborating with employers to adjust work schedules and with transportation authorities to adjust and/or expand services that better enable OVR customers to become gainfully employed. OVR staff participate on the local transit advisory committees. For example, the Capital Area Transit Persons with Disabilities Advisory Committee has developed a subcommittee related to Travel Training for elderly individuals and people with disabilities. OVR is providing training consultation along with disability knowledge and expertise to this committee. The Secretary of Labor and Industry sits on the Governor’s Employment First Cabinet Transportation Committee. OVR staff also attend these meetings to support the need for accessible, affordable transportation across the commonwealth for persons with disabilities seeking gainful employment.

Staff turnover and a Commonwealth hiring freeze, continues to adversely impact the agency's job placement expertise. OVR has renewed its emphasis on quality employment outcomes by reinstituting targeted staff training regarding effective employment strategies. The six-part training webinar series focuses on Basic Business Services, Labor Market Intelligence, Customer Job Readiness, Enhancing the Job Search, Effective Business Outreach, and Business Services and Ethical Considerations. It is intended to quickly advance the skills of newly hired VRCs and reinforce the knowledge skills of more experienced staff.

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

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

Successful achievement of this goal did not occur in PY 2020. A decrease in SE and CE outcomes is evident in the comparison of PY 2019 and PY 2020 data. As later referenced in B of Section P1, this reduction is likely the result of a closed Order of Selection, reduced customer interest in working during a pandemic, reduced employer demand while many businesses were shut down in PA during PY 2020, and reduced CRP availability due to staffing shortages. Despite the decrease in outcomes, OVR utilized the following strategies to foster an increase in SE and CE outcomes during PY 2020:

1. Continuing monthly technical assistance calls with CRPs
2. Adding the provision of virtual SE services (when appropriate) during the COVID-19 pandemic
3. Increasing SE and CE rates to mitigate the economic impacts related to COVID-19 and to help boost CRP availability

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Unique challenges appeared between 2019 and 2021 which included the closing of OVR's Order of Selection and the COVID-19 pandemic. The closure of OVR's Order of Selection reduced the number of customers being served by the agency, thus reducing the number of customers receiving SE services. A short time after closing the order, COVID-19 impacted service delivery. OVR staff were restricted to telework status, service provider availability was limited, and customers were reluctant to participate in on-site work activities/services. The combined effects impeded the achievement of projected goals.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

During Program Year (PY) 2018-19, OVR served nearly 70,000 individuals with disabilities, worked with over 6,000 employers, and assisted more than 7,400 individuals with disabilities to obtain or maintain competitive integrated employment. Additionally, OVR and our partner providers continue to deliver an extensive array of pre-employment transition services to over 25,000 students with disabilities annually across Pennsylvania.

In accordance with WIOA Section 506(b), the performance accountability system requirements of WIOA Section 116 took effect July 1, 2016. However, the U.S. Department of Education exercised its transition authority under WIOA Section 503 to ensure the orderly transition from the requirements under the Workforce Investment Act to the requirements under WIOA. As such, the performance accountability system requirements for the WIOA Title IV VR program went into effect July 1, 2017, at which time OVR began collecting and reporting data related to

certain performance indicators under WIOA through the quarterly submission of the federal RSA-911 report.

When this State Plan was developed, only one of the six performance indicators was being reported and published by the RSA in the WIOA Statewide and Local Performance Reports (WIOA Annual Reports): Measurable Skill Gains. Data driving the remaining five performance indicators will be progressively available and reported as part of OVR's WIOA Annual Report over the next four years. As part of the PY 2018 WIOA Annual Reports, expected to be published by the RSA in Spring 2020, two additional performance indicators under WIOA Section 116 will be reported: Employment During the 2nd Quarter after Exit and Median Earnings During the 2nd Quarter after Exit. For PY 2020, OVR's published Employment During the 2nd Quarter after Exit was 25.3% and the Median Earnings During the 2nd Quarter after Exit were \$5,946.

The RSA published PY 2019-2020 WIOA Annual Reports for each state in June 2020, which contained the Title IV performance under the Measurable Skill Gains indicator. For PY 2020, OVR's published Measurable Skill Gains rate was 17.1% of participants who met the criteria to be included in the indicator.

The 6th indicator, "Effectiveness in Serving Employers," will be piloted using 2 of the 3 approaches identified by Section 116 of WIOA. The following 6 Measures will be used to develop the data needed to report on the "Effectiveness in Serving Employers" indicator.

Measure #1. Employer Information and Support Services (future use of CWDS Business Design Tool)

Total estimated number of employers that received annual OVR assistance with:

1. contacts regarding OVR talent pipeline for qualified pre-screened candidates – 4000;
2. job fairs and hiring events for OVR talent in collaboration with One-Stop staff and partners at CareerLinks® and OVR District Offices - 100;
3. coordination of talent acquisition with OVR partners - 100;
4. OVR outreach to CSAVR VR-NET- 50;
5. job and task analysis - 100; and
6. ADA accessibility of worksite and accommodation reviews - 20.

Measure # 2. Engaged in Strategic Planning/Economic Development

Estimated number of employer planning meetings, outreach events, and trainings:

1. promoting collaboration on persons with disabilities employment - 100;
2. Business RoundTable discussions on finding talent, meeting business needs for growth and human capital - 8; and
3. overcoming transportation barriers for persons with disabilities - 10.

Measure # 3. Accessing Untapped Labor Pools

Estimated number of inter-agency contacts, meetings, outreach events and trainings:

1. promoting collaboration on student paid work-based learning experiences - 2888;
2. hiring of veterans with disabilities - 5;

3. hiring of older workers with disabilities - 10; and
4. hiring of ex-offenders served by OVR - 25.

Measure # 4. Training Services

Estimated consultations or trainings on:

1. ADA as Amended accommodation, accessibility - 50;
2. disability awareness - 50;
3. Section 503 Federal Workforce diversity goals - 10;
4. OJT wage reimbursement - 1241;
5. pre-employment transition services work-based learning experiences - 25,000;
6. supported or customized employment and business-based models to on-board qualified persons with disabilities - 4000; and
7. use of Federal Schedule A in federal hiring and on-boarding - 10.

Measure # 5. Incumbent Worker Training Services, Rapid & Layoff Response

Incumbent workers must be Most Significant Disability and OVR eligible.

Estimated consultation to employer on referrals to OVR - 0.

Measure # 6 Employer Information and Support Services

Estimated number of workshops, presentations to businesses on:

1. state or Federal persons with disabilities hiring Tax Credits (WOTC-VR credit) - 300;
2. general availability of OVR talent pipeline on current status 20 job ready customers – 300; and
3. OVR local plan to assist business in talent acquisition of high volume or high demand positions with One Stop CareerLink® and CRP collaboration - 1000.

All BSOD specialists and combined bureau staff will be trained in the use of the CWDS business design tool to create a statewide OVR business services case management system to track the following: all employer contacts, consultations on disability issues, ADA accessibility compliance, people with disabilities recruitment, job fairs, job shadowing, development of work-based learning experiences, and development of apprenticeship and pre-apprenticeship trainings. All apprenticeships and pre-apprenticeships will be eligible for local workforce board approved Eligible Training Provider List designation and individual training accounts that are also accessible to CareerLink served TANF, dislocated workers, veterans, youth, and returning to work homemaker participants.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

Since January 1, 2016, OVR has awarded more than \$11M to providers to support the development and operation of 24 I&E projects. Of these projects, 23 provided pre-employment transition services to high school students with significant disabilities. The remaining I&E project, supported by joint OVR and ODP funds, provided for staff from 12 community

rehabilitation providers to receive training and certification in Discovery and Customized Employment.

To date, 4,801 students with significant disabilities received services through the 23 I&E projects: 302 students entered competitive employment; 74 students entered post-secondary education; and 3 students entered military service. Three I&E Projects provided “transition from school to work” related education, information, support and services through informational sessions and workshops to a total of 4,146 students, parents/family members of transition aged youth, and transition professionals, to facilitate the understanding of and participation in the “school to work transition” process. The informational sessions and workshops were attended by 1,835 high school students with their parents or a transition professional.

Ten I&E projects provided 2,680 high school students with a work-based learning experience and 2,081 students successfully completed a 90-hour work-based learning experience in a competitive employment site in the community. For most of these students, this work experience was their first opportunity to learn work skills, specific job tasks, workplace safety and to interact with employers and co-workers on the job. These 10 I&E contractors exceeded the expectation of providing students with a paid 90-hour work-based learning experience; as successful outcomes, well beyond the scope of these projects, resulted as 197 students obtained competitive employment, 55 students participated in post-secondary education and 3 students entered the military.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

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

Background Beginning in the early 1980s, OVR developed a system of SE services using a fee-for-service payment system. Initially, 17 CRPs of SE services were funded through a 5-year, OSERS, Title III SE State Change Grant. In the 1990s, SE services expanded to include transitional employment for individuals with significant mental health disabilities through the Clubhouse model and the addition of contracts with CRPs fluent in American Sign Language to serve OVR customers who are deaf. In 1999, OVR moved to a milestone payment method of SE services called “Performance Based Job Coaching” (PBJC), the format of which was developed based on research OVR conducted in the mid-1990s to determine best practices for provision of SE services. PBJC went through review and revision in 2013-14 to improve the format. In 2015, OVR piloted Discovery and Customized Employment to further expand the range of SE services to better serve individuals with the most significant disabilities. A complete overhaul of OVR’s SE policy and procedures occurred from 2016-18 brought about by recommendations of a SE Workgroup and new regulations stemming from WIOA. Changes included a revision of the PBJC milestones and pay structure to correspond with a customer’s job stability, a move from LOUs with CRPs to a SE Provider Agreement, the inclusion of Discovery/Customized Employment in 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 August 2021, there are 155 approved SE providers, with 25 providers approved to render Discovery/Customized Employment services.

Quality Standards 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, videoconferences and conference calls.

Previously, CRPs became SE providers for OVR through an LOU. Monitoring of these CRPs was conducted on a two- and four-year cycle by OVR's Contracts and Grants division using provider report cards, staff surveys, and both desk and on-site reviews. With the move to the new SE system, procedures are under development for monitoring both internal processes and CRPs. Internal monitoring will involve OVR statewide and District Office "report cards" based on data from electronic tracking of service authorizations and payments and individual case reviews with a focus on SE processes and outcomes. External monitoring will include: provider report cards, a District Office survey of provider performance, and on-site monitoring visits.

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 includes 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 Pennsylvania, sources of funding for extended services are available to ensure long term supports for those who require them. For example, ODP and OLTL have funding for extended services for those customers who receive waiver funding 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 sought for extended service funding are natural supports, SSA work incentives, and private foundations.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

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 entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

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

The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry.

2. 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)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry.

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20], 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 AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

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

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

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry. Shannon Austin, OVR Executive Director

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

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

The Executive Director of The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry.

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

[14] Public Law 113-128.

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

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

[17] 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.

[18] 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.

[19] 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.

[20] Applicable regulations, in part, include the citations in footnote 6.

Table 3: Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	Name of Signatory Entry Field
Title of Signatory	Executive Director
Date Signed	Date Signed Entry Field

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in

sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

Table 4: Assurances

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	Yes
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	Yes
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	Yes
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	Yes
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	Yes
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	Yes
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	Yes
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No

The State Plan must include	Include
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	Yes
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	Yes
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	Yes
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	Yes
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	Yes
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	Yes
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	Yes
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	Yes
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	Yes
4.e. 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	Yes

The State Plan must include	Include
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	Yes
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	Yes
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	Yes
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	Yes
4.j. With respect to students with disabilities, the State,	-
4.j.i. Has developed and will implement,	-
4.j.i.I. Strategies to address the needs identified in the assessments; and	Yes
4.j.i.II. 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	Yes
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	Yes
5. Program Administration for the Supported Employment Title VI Supplement:	Yes
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	Yes
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	Yes
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	Yes
6. Financial Administration of the Supported Employment Program:	Yes
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to	Yes

The State Plan must include	Include
youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when 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	Yes
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That It Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	Yes
7.b. The designated State agency assures that:	-
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	Yes
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	Yes

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

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.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers

indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Table 5: Performance Indicators

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	55.6%	Baseline	56%	Baseline
Employment (Fourth Quarter After Exit)	43.3%	Baseline	44%	Baseline
Median Earnings (Second Quarter After Exit)	\$4,413.59	Baseline	\$4,500	Baseline
Credential Attainment Rate	0.3%	Baseline	1%	Baseline
Measurable Skill Gains	38.2%	20.0%	39%	21.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.