

**PENNSYLVANIA PYS 2024-2027 - VOCATIONAL
REHABILITATION PROGRAM (COMBINED OR
GENERAL) VOCATIONAL REHABILITATION**

(Order of Selection addendum)

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Program-Specific Requirements for State Vocational Rehabilitation Services Program

Please note: Updates to the plan are marked by double asterisks and dark blue font.

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

(a) State Rehabilitation Council.

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

(A) is an independent State commission.

(B) has established a State Rehabilitation Council.

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

Table 1: Composition of the Council

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2 nd Term	07/12/2023
Parent Training & Information Center	1 st Term	10/11/2022
Client Assistance Program	2 nd Term	07/12/2022
Qualified VR Counselor (Ex-Officio if Employed by the VR Agency)	1 st Term	10/11/2022
Community Rehabilitation Program (CRP) Service Provider	1 st Term	09/21/2021

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Business, Industry & Labor	1 st Term	4/10/2023
Business, Industry & Labor	2 nd Term	07/12/2022
Business, Industry & Labor	1 st Term	08/28/2023
Business, Industry & Labor	Vacant	N/A
Disability Advocacy Groups (Physical Disabilities)	2 nd Term	07/12/2022
Disability Advocacy Groups (Sensory Disabilities)	1 st Term	9/21/2021
Disability Advocacy Groups (Mental Health)	2 nd Term	07/12/21
Disability Advocacy Groups (Sensory Disabilities)	2 nd Term	07/12/2021
Disability Advocacy Groups (Intellectual Disabilities)	1 st Term	07/21/2022
Current or Former Applicants for, or Recipients of, VR Services	2 nd Term	07/12/2023
Section 121 (AIVRS) Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2 nd Term	07/12/2023
State Workforce Development Board (WDB)	Vacant	N/A
VR Agency Director (Ex Officio)	1 st Term	N/A

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

The PA Rehabilitation Council (PaRC) does not currently have a representative from the State Workforce Development Board (WDB);

however, the Executive Director of the WDB is aware of the vacancy and supportive of filling it. He regularly reaches out to WDB members to encourage volunteers, as he is not able to serve due to the nature of his position with the Commonwealth. In the absence of an official member, the WDB Executive Director regularly assigns staff members from workforce-related Commonwealth agencies to attend PaRC committee meetings and share relevant information. OVR, PaRC and the WDB are in regular communication regarding the need to fill this position and will continue to pursue a representative. The PaRC is also actively seeking a fourth representative for Business, Industry & Labor.

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

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

1. PaRC Annual Report (State Fiscal Year [FY] 2021-2022)
2. OVR Customer Satisfaction Surveys
3. Review of items in the 2022 State Plan Attachment (Description A)
4. Comments received at 2022/2023 State Plan Meetings
5. Comprehensive Statewide Needs Assessment (CSNA) Program Years (PY) 2019-2022 OVR/Institute on Disabilities at Temple University
6. Local Citizen Advisory Committees (CAC) meetings and/or minutes
7. Quarterly reports received from OVR at PaRC Full Council meetings

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

Commendation: The Council commends OVR for reopening the Order of Selection (OOS) and their work on the Financial Needs Test (FNT) and College Policy, thus providing many more opportunities for people across the Commonwealth to participate in VR and secure Competitive Integrated Employment (CIE).

Recommendations:

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

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

Recommendations/Measurable goals:

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

OVR Response: Year One is in progress to establish foundation according to the proposal submitted to the Rehabilitation Services Administration (RSA) in preparation for Year Two when the InVEST Project will begin implementation.

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

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

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

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

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

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

Recommendations/Measurable Goals:

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

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

3. Recovery Efforts from the many impacts of COVID-19

Issue: Since March 2020, when physical distancing protocols began in PA, issues with VR services have been exacerbated on all sides, including those who have experienced the lasting effects from COVID-19 or long-COVID, delayed VR services, disruptions to Pre-Employment Transition Services (Pre-ETS), and the lack of communication, interaction, and response for those seeking services.

Recommendations/Measurable Goals:

1. Expedite all VR services/cases that have been delayed since March 2020 due to the impacts of COVID-19.

OVR Response: Currently all cases on the waitlist have been served and those who were not able to participate in OVR services during the pandemic for health, personal, or other reasons, will be encouraged to apply. The OVR OOS is open to all three categories based on internal priority selection policies.

2. Provide a timeline for expedited services for those who have experienced delays with Pre-ETS due to the impacts of COVID-19.

OVR Response: Rapid Engagement initiatives have been put into place since October 2022 to expedite the referral, application, and eligibility processes. OVR's referrals and Pre-ETS participation rates continue to increase steadily. OVR will continue to outreach to schools and other stakeholders to generate other referrals.

3. Within 30 days of the adoption of the State Plan, interact personally at least one time with individuals whose cases have been delayed or inactive since March 2020 either by phone, in-person meeting, or virtual meeting.

OVR Response: Through the months of April-June 2023, OVR conducted a Lean 5S Project requiring all staff to reach out to existing customers and ensure they are actively engaged. If they were not actively engaged, staff updated those cases to reflect current goals or closed cases when they were unable to connect with a customer. Customer engagement remains a central piece of OVR's Rapid Engagement strategy and staff will continue to make sure customers are continuously engaged with our system. Staff are also responsible for maintaining continued Rapid Engagement strategies to ensure cases progress timely, and office managers and supervisors have been tasked with developing monitoring and supervisory procedures to ensure compliance with federal service provision timeframes.

4. Strengthen Collaboration between Bureau of Vocational Rehabilitation Services (BVRS) and Bureau of Blindness and Visual Services (BBVS)

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

Recommendations/Measurable goals:

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

OVR Response: OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus.

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

OVR Response: OVR continues to submit employment postings supported by existing complement positions and works with the

Governors' Office of Talent Acquisition to assist with talent recruitment.

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

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

4. OVR will provide Innovation & Expansion grant opportunities to entities interested in providing specific blindness skills training to Pre-ETS and BBVS customers enrolled in VR services.

OVR Response: OVR will explore the need for Innovation & Expansion opportunities and will also continue to do community outreach to encourage additional providers to work with OVR and provide services to customers.

5. Promoting Competitive Integrated Employment Workplace Settings

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

Recommendations/Measurable goals:

1. WIOA defines CIE as work that is performed on a full-time or part-time basis for which an individual is: 1) compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and experience; 2) receiving the same level of benefits provided to other employees without disabilities in similar positions; 3) at a location where the employee interacts with other individuals without disabilities; and 4) presented opportunities for advancement similar to other employees without disabilities in similar positions. OVR will provide education and outreach to organizations that it partners with to help ensure PA's workplace settings align with the WIOA definition of CIE.

OVR Response: OVR's policy and review process is aligned with WIOA's definition of CIE and OVR's Business Services & Outreach Division (BSOD) will be providing information and education materials to new employers with whom they engage. When necessary, OVR goes

conducts site visits with employers to ensure they are compliant with the CIE policy.

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

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

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

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

6. Customer Satisfaction Surveys

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

Recommendations/Measurable goals:

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

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

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

OVR Response: OVR currently has a devoted staff member who handles the above but will certainly consider additional resources to complete these tasks.

7. Identification of populations served by BVRS and BBVS.

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

Recommendations/Measurable Goals:

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

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

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

OVR Response: OVR will provide a fiscal report regarding expenditures of services.

****8. Federal flat funding of the national VR program.**

Issue: In May of 2024, OVR was given late notification of federal flat funding of PY 2024, with PY 2025 also likely to be flat funded, resulting in a budgetary loss of approximately 13 million dollars for PY 2024. Although we previously commended OVR for opening the OOS, the Council does recognize the need to reinstate the OSS based on federal funding issues.

Recommendations/Measurable Goals:

1. OVR will reinstate the Order of Selection (OOS) as per 34 CFR § 361.36 of the Rehabilitation Act, for FFY 2025 to prioritize and ensure existing OVR customers in the Most Significant Disability category will receive services.

OVR Response: OVR accepts this recommendation as flat funding will create a variety of fiscal and staffing challenges for the agency. We will need time to implement additional cost containment measures and having the OOS available for utilization will help ensure that the agency can continue to serve existing customers as effectively as possible.**

(f) Annual Estimates.

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In

accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Table 2: VR Program Estimates for Next Federal Fiscal Year

Priority Category (if applicable)	No. of Individuals Eligible For Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	**32,000**	**32,000**	**\$132,000,000**	N/A
Significant Disability	**3,000**	**1,500**	**7,000,000**	**1,500**
Non-Significant Disability **(to be renamed All Other Disabilities)**	**150**	**75**	**\$360,000**	**75**

(B) Supported Employment Program.

Table 3: Supported Employment Program Estimates for next Federal Fiscal Year

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	No. Receiving Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	8,300	8,300	\$20,100,000	N/A
Significant Disability	450	450	\$1,100,100	N/A
Non-Significant Disability **(to be renamed All Other Disabilities)**	35	35	\$85,000	N/A

(g) Order of Selection.

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

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

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

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

**(1) For VR agencies that have defined priority categories describe—
(A) The justification for the order;**

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

On July 1, 2019, with approval from the Rehabilitation Services Administration (RSA), OVR closed priority categories Most Significant Disability (MSD), Significant Disability (SD), and Non-Significant Disability (NSD). The OOS was subsequently opened on August 8, 2022, and as of February 22, 2023, all eligible customers on the wait list were able to be removed from the list. OVR evaluates the fiscal outlook quarterly and re-develops the OOS only if found fiscally necessary.

In spring of 2024, OVR was notified that the national VR program was being flat funded at the federal level for Federal Fiscal Year (FFY) 2024 and is likely to be flat funded again for FFY 2025. The flat funding resulted in a budgetary shortfall of approximately \$13 million for PY 2024 and estimated loss of \$15M for FFY25, as a result, OVR began instituting cost saving measures. It was determined that OVR's available and projected resources may not be adequate to ensure the provision of the full range of VR services to all eligible individuals moving forward.

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

Upon final approval from RSA:

1. OVR will close the SD and NSD categories and establish a waitlist for those categories to prioritize services to the MSD category, with a target date of no later than February 1, 2025. OVR will continue to monitor the fiscal outlook on an ongoing basis and will reserve the option to also close the MSD category if determined fiscally necessary.
2. For the definition changes as described below to MSD and SD, once RSA approves, PA OVR will work to make appropriate system updates and train staff with a target date of implementing the definition changes at the start of the PY25 (July 1, 2025). As part of the

definition changes, the NSD category will be renamed as: All Other Disabilities (D).**

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

First Priority: Most Significant Disability; **Second Priority:** Significant Disability; **Third Priority:** Non-Significant Disability (to be renamed All Other Disabilities).

Description of priority categories

First Priority: Most Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit **four or more** of the individual's functional capacities; and
- the individual must be expected to require two or more VR services that are expected to last six months or more from the date of the Individualized Plan for Employment (IPE) or be needed on an ongoing basis to reduce an impediment to employment.

Second Priority: Significant Disability

- The physical, mental, or sensory impairment(s) must seriously limit **two to three** 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 or more from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

Third Priority: Non-Significant Disability **(to be renamed All Other Disabilities (D))**

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

(C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and

the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

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

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

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

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

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

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

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

Job Retention:

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

1. The job must be in a competitive integrated setting. If services are needed for other purposes, they may not be delivered, and the applicant must wait until their name is removed from a wait list category and placed into active service. This means that if the individual needs services that are not directly tied to maintaining current employment, the individual's ability to receive those services from the VR program depends on the individual's placement on the wait list.
2. **Immediate risk** means that the individual would almost certainly lose their current job if not provided specific services or equipment in the very near future that would enable them to retain that employment.
3. Immediate risk of losing the job due to the disability does not include economic conditions and non-disability related factors.

Procedure for processing applications:

1. Upon receipt of referral, counselor meets with applicant to complete application and inform them about OOS and resources that can assist them while they are on the wait list.
2. Counselor will input data and application date, scan and upload documents in OVR's CWDS database systems, and determine eligibility within 60 days of the date of application.
3. After eligibility determinations are made, customers will be assigned to an OOS priority category based on their functional limitations and need for multiple VR services over an extended period of time (currently defined as six months or more).

4. CWDS will add the case to a wait list in the system, not allowing services to proceed. Notice of such (as outlined above) will be sent to the customer.

Procedure for putting customers on the wait list:

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

Procedure for taking customers off the wait list:

1. OVR will determine when to open each category based upon financial availability and evaluate the ability to open categories quarterly. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category.
2. 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 wait 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 in each district office will ensure customers are assigned to counselors.
6. Counselors will complete an IPE within 90 days of the date the client was taken off the wait list.**

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

- Yes
- No